



Safeguarding Adults Policy and Procedures

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1. Introduction and scope

Brentford Football Club (BFC) is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in our Club's activities and services in accordance with the Care Act 2014.

BFC will encourage and support partner organisations to adopt and demonstrate their commitment to the principles and practice of equality as set out in this policy and procedures.

Brentford Football Club has a role to play in safeguarding the welfare of all adults by protecting them from physical, sexual or emotional harm and from neglect or bullying. Our staff will be made aware of the policy through staff inductions and our members must make themselves aware of the 'Brentford Football Club Safeguarding Policy and Procedures'. Where appropriate the following guidelines will be supplemented by in-service training and additional guidance.

This Policy and Procedures document is compliant with legislation including but not limited to the Care Act 2014; statutory guidance such as Safeguarding Vulnerable Groups Act 2006; and governing body rules and regulations including the EFL Rules and FA Regulations. This Policy and Procedures document should be read in conjunction with related Club policies and procedures.

Principles

The guidance given in this Policy and Procedures document is based on the following principles set out in The Care Act:

Empowerment - People being supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Prevention – It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality – The least intrusive response appropriate to the risk presented.

"I am sure that the professionals will work in my interest, as I see them, and they will only get involved as much as needed."

Protection – Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse



Helpful and necessary - “I am confident that professionals will work together and with me to get the best result for me.”

Accountability – Accountability and transparency in delivering safeguarding. “I understand the role of everyone involved in my life and so do they.”

All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.

BFC will seek to ensure that our activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

The rights, dignity and worth of all adults will always be respected.

We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

We recognise that a disabled adult may or may not identify themselves or be identified as an adult ‘at risk’.

We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within our Club’s activities for example inappropriate behaviour of a coach, or in the wider community.

All allegations will be taken seriously and responded to quickly in line with the Club’s Safeguarding Adults Policy and Procedures.

BFC recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Boards.

The following locations/departments are under the remit of this policy including:

- Griffin Park
- Brentford FC Club Shop (Braemar Road)
- Brentford FC Training Ground – Jersey Road (1st Team and B team)
- Brentford Community Stadium Reservation Centre and Heritage Walk Office
- Stewarding and all other match days activities
- Travel, events and supporter liaison
- Any other Club activities where members will encounter adults and adults at risk



Brentford FC Community Trust

The Brentford FC Community Sports Trust are not included within this policy, as they are a separate charity and have their own policies and procedures in place. More information about their policies can be found on their website at: <https://www.brentfordfcst.com/> We do, however reference some of their key safeguarding contacts within this policy as some of their staff are involved in several Brentford FC activities, so for reference the contact details are listed.

2. Key definitions

To assist working through and understanding this policy a number of key definitions need to be explained:

Adult at Risk of harm is a person aged 18 or over who has needs for care and support (whether or not the local authority is meeting those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence. This list is not exhaustive. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Abuse is a violation of an individual's human and civil rights by another person or persons. See the section below on types of abuse for further explanation.

Adult is anyone aged 18 or over.

Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

3. Safeguarding adults - Club roles and responsibilities

Brentford Football Club has a comprehensive safeguarding structure in place across the Club and its different departments. Below is the list of the various roles and how they fit into the structure. Contact details for each individual are included in this policy in **Appendix 1**.

- Board Member – Safeguarding Champion
- Senior Safeguarding Manager (SSM) – Club
- Designated Safeguarding Officer – Club
- Designated Safeguarding Officer (DSO) – Matchdays x2
- Designated Safeguarding Officer – Training Ground



Each member of staff has been trained in safeguarding and the DSO's are the first point of contact for all Club staff regarding concerns about the welfare of any adult. The SSM and DSO's will liaise directly with the County FA (CFA) Welfare Officers along with the English Football League and will be familiar with the procedures for referring any concerns. They will also play a proactive role in increasing awareness of safeguarding best practices.

Role descriptions

Safeguarding Champion – is responsible for making sure safeguarding is a key priority at the Club and at board level.

Senior Safeguarding Manager - is responsible for providing Club-wide strategic leadership that assists the Club to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Director and Heads of Department level.

Designated Safeguarding Officer (Club) - is responsible for the strategic and operational direction and embedding safeguarding across the Club they are also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer.

Designated Safeguarding Officer (Matchdays and Training Ground) – are responsible for embedding safeguarding in their own departments and point of contact if concerns arise.

4. Safeguarding key processes/areas covered

Types of Abuse and Neglect - Definitions from the Care Act 2014

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

Self-neglect – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. In football this could be a player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.

Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. In football you may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.

Domestic Abuse – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence (see 5.2.2 below) and controlling and coercive behaviour which isolates, undermines and causes distress/harm. Sport may notice a power imbalance between a participant and a family member. For example, a participant with learning and communication differences may appear quiet and withdrawn when their brother comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.



Discriminatory – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act. This could be the harassing of an individual because they are or are perceived to be transgender

Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. In football, this could be training without a necessary break.

Physical Abuse – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. This could be a coach intentionally striking a player.

Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

This could be a fellow participant who sends unwanted sexually explicit text messages to a learning-disabled adult they are training alongside.

Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. This could be someone taking equipment from a fan or participant with dementia.

Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. This could be a coach not ensuring players have access to water.

Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

This could be a player threatening another player with physical harm and persistently blaming them for poor performance.



Not included in the Care Act 2014 but also relevant:

Cyber Bullying - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Honour based violence - 'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female of any age about going on a long holiday during the summer vacation period. A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. The reporting of any concerns about either suspected forced marriage or FGM is mandatory. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been several Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation and extremism - the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media. Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.

The government defines extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs' (HM Government Prevent Strategy). Many of those who have been subject to



radicalisation are acknowledged to have been vulnerable as a result of social isolation, mental health issues, learning and communication difficulties or unstable social circumstances.

Signs and indicators of abuse and neglect

Abuse can take place in any context and by all manner of perpetrator. Abuse may be inflicted by anyone in the Club who a player comes into contact with. Club members, workers, volunteers or coaches may suspect that a participant is being abused or neglected outside of the Club setting. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.

5. Good practice, poor practice and abuse

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental.

It is not the responsibility of any individual involved in Club activities to make judgements regarding whether or not abuse is taking place, however, all BFC personnel have the responsibility to recognise and identify poor practice and potential abuse, and act on this if they have any concerns.

Good practice

BFC expects that that coaches of adult participants:

- Adopt and endorse the Club's Codes of Conduct.
- Have completed a course in basic awareness in working with Adults at Risk.

Everyone should:

- Aim to make the experiences of participants positive and enjoyable.
- Promote fairness and playing by the rules.
- Not tolerate the use of prohibited or illegal substances.
- Treat all adults equally and preserve their dignity; this includes giving more and less talented members of a group similar attention, time and respect.

Coaches and those working directly with adults at risk should:

- Respect the developmental stage of each participant and not risk sacrificing their welfare in a desire for team or personal achievement.
- Ensure that the training/tasks intensity is appropriate to the physical, social and emotional stage of the development of the individual.
- Work with the adult at risk's medical adviser/sports scientists/physio staff and their carers (where appropriate) to develop realistic training and competition schedules which are suited



to the needs and lifestyle of the player, not the ambitions of others such as coaches, team members, parents or carers.

- Build relationships based on mutual trust and respect, encouraging adults at risk to take responsibility for their own development and decision making.
- Always be publicly open when working with adults at risk:
 - avoid coaching sessions or meetings where a coach and an individual player are completely unobserved.
- Avoid unnecessary physical contact with people. Physical contact (touching) can be appropriate so long as:
 - It is neither intrusive nor disturbing.
 - The individual's permission has been openly given.
 - It is delivered in an open environment.
 - It is needed to demonstrate during a coaching session.
- Maintain a safe and appropriate relationship with participants and avoid forming intimate relationships with any participants that you are working with as this may threaten the position of trust and respect present between player and coach.
- Be an excellent role model by maintaining appropriate standards of behaviour.
- Gain the adult at risk's consent and, where appropriate, the consent of relevant carers, in writing, to administer emergency first aid or other medical treatment if the need arises.
- Be aware of medical conditions, disabilities, existing injuries and medicines being taken and keep written records of any injury or accident that occurs, together with details of treatments provided.
- Arrange that someone with current knowledge of emergency first aid is always available.
- Gain written consent from the correct people and fill out relevant checklists and information forms for travel arrangements and trips. This must be the adult themselves if they have capacity to do so.

Poor practice

The following are regarded as poor practice and should be avoided:

- Unnecessarily spending excessive amounts of time alone with an individual adult participant.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allowing or engaging in inappropriate touching of any form.
- Using language that might be regarded as inappropriate by the adult and which may be hurtful or disrespectful.
- Making sexually suggestive comments, even in jest.
- Reducing an adult to tears as a form of control.
- Letting allegations made by an adult not fully investigated, unrecorded, or not acted upon.
- Taking an adult at risk alone in a car on journeys, however short.
- Inviting or taking an adult at risk to your home or office where they will be alone with you.



- Sharing a room with an adult at risk.
- Doing things of a personal nature that adults at risk can do for themselves.

Note: *At times it may be acceptable to do some of the above because it is felt to be in the best interests of the individual. In these cases, to protect both the adult at risk and yourself, seek written consent from the adult at risk and, where appropriate, their carers, and ensure that the DSO is aware of the situation and gives their approval. Any risk should be acknowledged, and measures agreed that reduce or mitigate against these risks.*

If, during your care, an adult at risk suffers any injury, seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands/misinterprets something you have done, report these incidents as soon as possible to a member of the safeguarding team and make a brief written note of it.

What to do if you have a concern or someone raises concerns with you

You may become aware that abuse or poor practice is taking place, suspect abuse or poor practice may be occurring or be told about something that may be abuse or poor practice and you must report this to the appropriate Designated Safeguarding Officer (DSO) or, in his absence, to one of the designated safeguarding staff (see Appendix 1).

If you are concerned someone is in immediate danger, contact the police straight away.

It is important when considering your concern that you also consider the needs and wishes of the person at risk, taking into account the nature of the alert. More information on this is given in Appendix 2 'The Legislative Framework'.

6. Procedures for dealing with a safeguarding concern

Consent

The priority in safeguarding should always be to ensure the safety and welfare of the adult at risk. If concerns arise, it is best practice to always gain the consent of the adult at risk before an external referral is made. There are several circumstances whereby an external referral can be made without consent and these include:

- The adult is at risk of harm
- Other people are, or may be, at risk, including other adults, children or young people
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent
- Sharing the information could prevent a serious crime
- The adult lacks the mental capacity to make that decision
- A serious crime has been committed
- There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting



- Employees, workers, consultants, agency staff or volunteers are implicated

What to do if you suspect abuse or poor practice has occurred?

If you are concerned about the safety or welfare of an adult or you are concerned about an adult's behaviour towards another adult, you must act. Do not assume that someone else will help them safeguarding of adults is everyone's responsibility.

It is important that you report your concerns to one of the following:

- Designated Safeguarding Officer;
- Safeguarding Team; or
- Senior Safeguarding Manager

Taking no action is not an option.

What to do if you receive a safeguarding disclosure from an adult

Adults who may be vulnerable are likely to disclose abuse or neglect to those they trust and how one responds to a disclosure is crucial.

Stage 1

Deal with the disclosure as it happens and ensure that the adults immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedures document, even if the validity of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the person who may be at risk.

You must:

- Put your own feelings aside and listen as if the information is not sensational
- Allow the person to lead the discussion and to talk freely
- Listen to what the person is saying without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated
- Allow the person to tell you at their own pace
- Don't worry if the person stops talking for a while, silences are ok. You don't have to rush in to fill the gaps
- Accept what the person says without challenge
- Allow the person to talk but protect them from sharing the information with too many other people
- Provide reassurance that you are taking them seriously and they have done the right thing by disclosing
- Let the person know it is recognised how hard it is for them to tell you
- It is ok to let them know if you are unable to answer all their questions
- Avoid asking leading questions, for example "Did the coach hit you?"



- Never ask questions that may make the person feel guilty or inadequate
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a person to remove or adjust their clothing to observe them and do not take photographs of the injuries, you should make a note of the injuries in the Safeguarding Incident report form
- Tell the person who you will be contacting e.g. Club's Safeguarding Team or DSO and that you will support them through that process

If you establish that they have been harmed or is at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure; and Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know.

You must not:

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings
- Document the conversation while the person is disclosing. This should be done as soon as possible after the person has disclosed to you
- After the person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the person to describe what happened
- Investigate
- Give the impression that you might blame the person e.g. don't ask: "Why did you let him?", "What were you doing there anyway?" or "Why didn't you tell me before?"
- Press for details by asking questions such as "What did they do next?"
- Ask leading questions
- Pass judgment on what is said
- Make false promises and/or promise confidentiality – it should be explained that the person has done the right thing, outline who will need to be told and why
- Approach the alleged abuser yourself
- Do remember, when a person discloses they may feel:
 - Guilt: they may blame themselves for the abuse and often feel guilt for telling.
 - Ashamed: they may feel ashamed about the abuse itself.
 - Confused: they may be confused about their feelings for the alleged abuser.
 - Scared: they may be fearful of the repercussions of telling. They may be scared of the alleged abuser.
- Be careful about touching (e.g. hugging or cuddling) the person if they have not initiated the contact. They may be upset by physical contact.



Stage 2

As soon as possible, once the immediate comfort and safety of the person is secured, you must inform your DSO, or the Safeguarding Team of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the person's immediate safety and/or are having difficulty contacting the designated safeguarding person/s or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

You should complete the Club's Safeguarding Incident Form (SIF) as soon as possible after the disclosure has been made and send the SIF (Appendix 3) to the Safeguarding Team within 24 hours of the disclosure.

Wherever possible, you must record information as it was relayed to you using the language of the person rather than your own interpretation of it.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Safeguarding Team what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Club's Senior Safeguarding Manager and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even a child or young person may say something about a possible abusive situation. On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason.

Raising a concern

You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the appropriate Designated Safeguarding Officer, who will raise it with the Club's Safeguarding Team.

Step 2

If you feel unable to raise the matter with the DSO for whatever reason, raise the matter with the Club's other members of the Safeguarding Team.



Step 3

If you feel the Safeguarding Team has not handled the concern appropriately you should contact the Club's Senior Safeguarding Manager. If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, you should contact the Head of Safeguarding at the English Football League. Contact Alexandra Richards on 07792 284740.

Managing allegations against employees, workers, consultants, agency staff and volunteers

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to an adult, this should be reported to the Club's Safeguarding Team who will take such steps as considered necessary to ensure the safety of the person in question and any other person who may be at risk. The person raising the concern should complete the Club's Safeguarding Incident Form (Appendix 3). When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police
- The parent/carer of the person will be contacted as soon as possible, following advice from statutory agencies
- Senior Management will be notified and if applicable the EFL and the FA
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the Senior Safeguarding Manager who will refer the allegation to the appropriate statutory agencies
- If required, a full investigation and possible sanction in accordance with the Club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS)

Making a referral

All employees, workers, consultants, agency staff and volunteers should complete the Club's Safeguarding Incident Form (Appendix 3) after referring any case to the DSO and/or Safeguarding Team. The Safeguarding Team will contact the relevant Local Authority Adult Social care team completing their Referral Form and update the Safeguarding Incident Form for the Club's records.

What to do if a person is in danger of immediate harm

The priority is to ensure the person is in a safe place away from the alleged perpetrator. Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants or volunteers. In addition, employees, workers, consultants, agency staff and volunteers should have, readily available, all the contact numbers of the Club's Safeguarding Team, DSOs, colleagues, or other services which can assist in an emergency or urgent situation (Appendix 1). Report the matter to the Safeguarding Team and/or Senior Safeguarding Manager at the earliest opportunity.



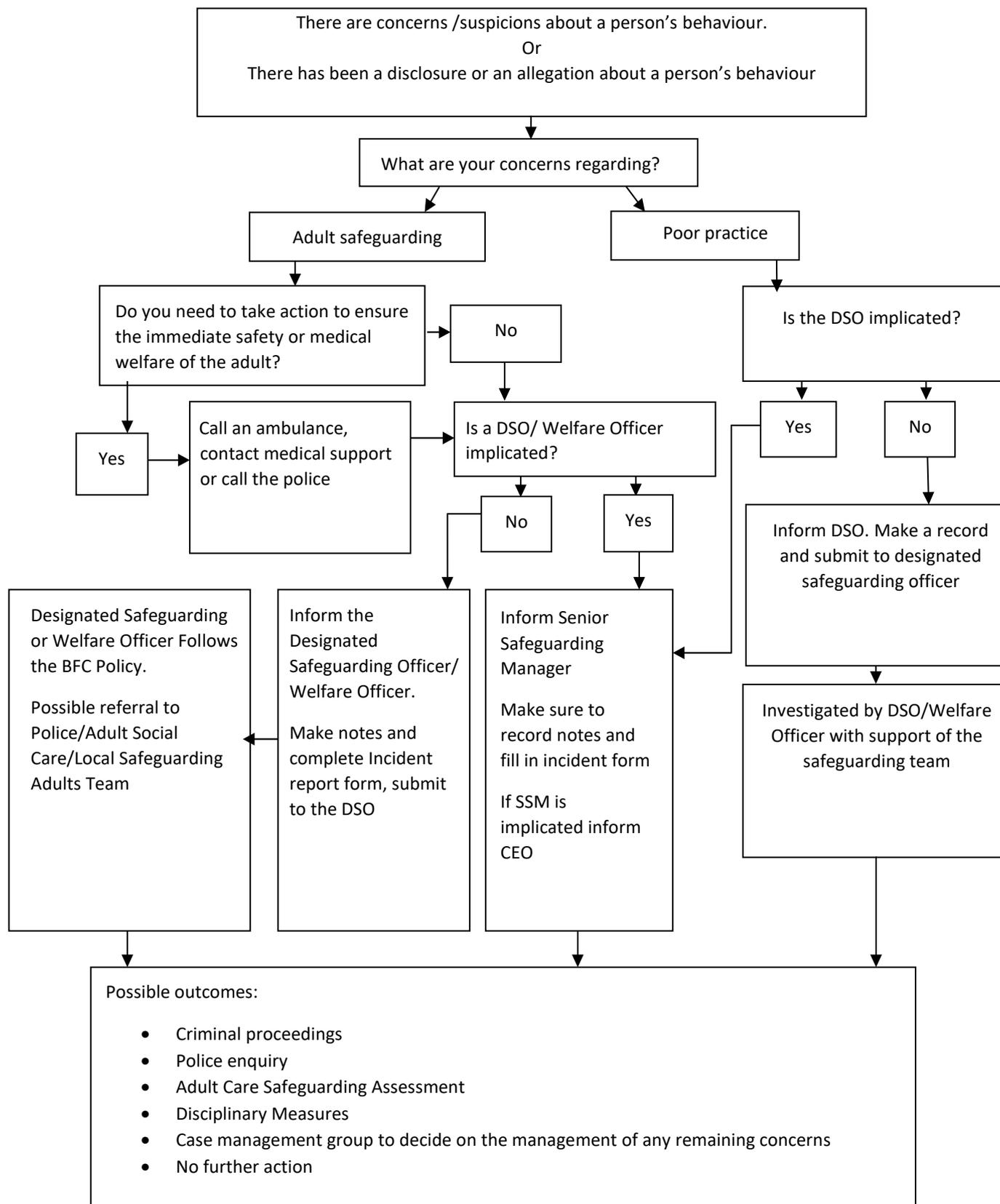
In the absence of the Safeguarding Team and/or Senior Safeguarding Manager, contact the London Borough of Hounslow Adult Social care team (telephone 020 8583 3100) and/or the police on 101 for help and to ensure the correct procedure is followed.

Whistleblowing

Brentford Football Club supports The FA's Whistle blowing Policy. Any adult or young person with concerns about a colleague can 'whistle blow' by contacting The FA Safeguarding Team on 0844 980 8200 4787, by writing to The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966, London SW10 9EQ or alternatively by going direct to the Police, Children's Social Care or the NSPCC.

Brentford Football Club encourages everyone to know about it and utilise it if necessary.

Safeguarding Adults Flowchart
Managing Concerns, Suspicions or Disclosures



Remember to involve the adult at risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity

7. Support and guidance on safeguarding matters

Dealing with a disclosure from a player, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for themselves and discuss this with their line Manager or HR Manager as appropriate.

Criminal Investigations and Social Care Services

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of Club staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve Club staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the Club.

Where both the police and social care services have decided to take no further action then the Club management may undertake an internal investigation in accordance with Club disciplinary procedures.

Local Authority Designated Officer (LADO)

The Safeguarding team will maintain a working relationship with the relevant LADOs (Local Authority personnel who preside over issues relating to adults who work with children) and where necessary, work in partnership in response to concerns, incidents or allegations.

If a member of staff is removed (or resigns) from their role as a result of an allegation or investigation conducted under this policy and the necessary criteria are met, a referral to the Independent Safeguarding Authority will be made in conjunction with the appropriate statutory agencies.

Additional Policies, Procedures and Guidelines

This Policy underpins all the work undertaken across the Club that involves direct (and in some cases indirect) engagement with children and vulnerable adults. Where there are significant areas or levels of engagement, this policy is supplemented by further policies, protocols, guidance and training.

8. Key safeguarding contacts and further advice

Hounslow Local Authority Designated Officer (LADO)

Telephone: 020 8583 5730

Email: LADO@hounslow.gov.uk

Hounslow Adult Social Care

Telephone: 020 8583 3100 - Monday to Friday from 9am to 5pm. Out of hours telephone: 020 8583 2222

Email: Adultsocialcare@hounslow.gov.uk or safeguardingadults@hounslow.gov.uk

Further advice on Safeguarding matters can be obtained from:

Alexandra Richards

English Football League (EFL) Safeguarding Manager

Tel: 07792 284740

Email: arichards@efl.com

Nikeeta Patel

London FA Designated Safeguarding Officer

Telephone: 020 7751 2420

Email: Safeguarding@LondonFA.com

Sharon Porter

Middlesex FA Designated Safeguarding Officer

Telephone: 0208 515 6903 or 07739 980164

Email: Sharon.porter@middlesexfa.com

<http://www.thefa.com/football-rules-governance/safeguarding>

Emailing – footballsafes@TheFA.com

Court of Protection - <https://www.gov.uk/courttribunals/court-of-protection>

Forced Marriage Unit - <https://www.gov.uk/guidance/forcedmarriage>

9. Revisions to the Safeguarding Adults Policy and Procedures

Implementation, Monitoring and Review of the Safeguarding Adults Policy and Procedures

The policy will be reviewed annually by the Safeguarding Team. It will be implemented through the Club's induction and training programme, and as part of day to day practice.

The Safeguarding Team carries out internal monitoring checks on a regular basis to ensure safeguarding and child protection procedures are in line with the policy.

Date	Name	Description
September 2019	Jon Burr	Created new Policy

Appendix 1 - Club safeguarding key contacts

The Club	Role	Email	Telephone
Sally Stephens	Fan and Community Relations Director/ Senior Safeguarding Manager	sstephens@brentfordfc.com	07850 644259
Allan Steele	B Team Technical Lead/Training Ground DSO	asteele@brentfordfc.com	07763 861395
Dave Gregg	Match Day Operations Assistant, Match Day DSO	dgregg@brentfordfc.com	07719 918695
Barney McGhee	Safety and Security Manager, Match Day DSO	bmcghee@brentfordfc.com	07471 036390
Jon Burr	Diversity and Inclusion Manager, Club DSO	jburr@brentfordfc.com	07975 856451
The Trust	Role	Email	Telephone
Amy Crook	Office Manager & Match Day Coordinator, Trust DSO	acrook@brentfordfcst.com	
Martin Bradshaw	Coach Deployment Officer, Deputy DSO	mbradshaw@brentfordfcst.com	07545 485770
Luke Skelhorn	General Manager, Senior Safeguarding Manager	lskelhorn@brentfordfcst.com	07977 508855

Other			
	The PFA	wellbeing@thepfa.co.uk	07500 000 777
	The FA	safeguarding@thefa.com	0808 800 5000 or text 88858
	NSPCC	help@nspcc.org.uk	

The FA has commissioned a dedicated NSPCC helpline for adults who were victims of sexual abuse in childhood within the football industry. NSPCC Victims helpline will be available 24 hours a day on 0800 023 2642

What: Safeguarding is everyone's responsibility. If you are worried about a child or Adult at risk, it is important that you report your concerns – no action is not an option

Where: All policies and procedures, including reporting forms are available on the Breathe HR system and available from any relevant DSO

When: Immediately

Appendix 2 – Other policies and relevant legislation

Guidance and Legislation

The practices and procedures within this policy are based on the principles contained within UK legislation, Government Guidance and take the following into consideration:

- The Care Act 2014
- Criminal Justice Act 1988
- Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- Human Rights Act 1998
- Data Protection Act 1994 and 1998
- Serious Crime Act 2015
- Care and Support Statutory Guidance (updated 12 February 2018)
- Counter terrorism and Security Act 2015

Sexual Offences Act 2003 <http://www.legislation.gov.uk/ukpga/2003/42/contents>

The Sexual Offences Act introduced a number of new offences concerning vulnerable adults and children. www.opsi.gov.uk

Mental Capacity Act 2005 <http://www.legislation.gov.uk/ukpga/2005/9/introduction>

Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and there should be least restrictive intervention. www.dca.gov.uk

Safeguarding Vulnerable Groups Act 2006 <http://www.legislation.gov.uk/ukpga/2006/47/contents>

Introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority. The Act places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for noncompliance. www.opsi.gov.uk

Deprivation of Liberty Safeguards

<https://www.gov.uk/government/collections/dh-mental-capacity-act-2005-deprivation-of-libertysafeguards>

Introduced into the Mental Capacity Act 2005 and came into force in April 2009. Designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm.

Disclosure & Barring Service 2013 <https://www.gov.uk/government/organisations/disclosure-and-barring-service/about> Criminal record checks: guidance for employers - How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS). www.gov.uk/dbs-update-service

The Care Act 2014 – statutory guidance <http://www.legislation.gov.uk/ukpga/2014/23/introduction/enacted>

The Care Act introduces new responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

Making Safeguarding Personal Guide 2014

<http://www.local.gov.uk/documents/10180/5852661/Making+Safeguarding+Personal++Guide+2014/4213d016-2732-40d4-bbc0-d0d8639ef0df>

This guide is intended to support councils and their partners to develop outcomes-focused, person-centred safeguarding practice.

Appendix 3 – Safeguarding Incident Form

Safeguarding incident reporting form

Your name:	Name of organisation: Brentford Football Club
Your role:	
Contact information (you):	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Child/Vulnerable Adult name:	Child/Vulnerable Adult date of birth:
Child/Vulnerable Adult ethnic origin: <i>Please state</i>	Does Child/Vulnerable Adult have a disability: <i>Please state</i>
Child/Vulnerable Adult gender:	
<input type="checkbox"/> Male <input type="checkbox"/> Female	
Parent's/carer's name(s):	
Contact information (parents/carers):	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Have parent's/carer's been notify of this incident?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If YES, please provide details of what was said/action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else:	
<input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else: <i>Please provide further information below</i>	
<i>Name:</i>	

Position in relationship to the Child/Vulnerable Adult:

Telephone numbers:

Email address:

Date and times of incident:

Details of the incident or concerns:

Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.

Child/Vulnerable Adult account of the incident:

Please provide any witness accounts of the incident:

Please provide details of any witnesses to the incident:

Name:

Position within the Club or relationship to the Child/Vulnerable Adult

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of any person involved in this incident or alleged to have caused the incident/injury:

Name:

Position within the Club or relationship to the Child/Vulnerable Adult

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of action taken to date:

Has the incident been reported to any external agencies?

Yes

No

If YES, please provide further details:
<p><i>Name of organisation/agency:</i></p> <p><i>Contact person:</i></p> <p><i>Telephone numbers:</i></p> <p><i>Email address:</i></p> <p><i>Agreed action or advice given:</i></p>

Your Signature:		Print name:	
Date:			

Contact your organisation's Designated Safeguarding Officer in line with Brentford Football Club reporting procedures.