



Stockport County
Football Club

Safeguarding Policy - Adults

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Safeguarding Policy Statement & General Principles

Stockport County Football Club endeavours to ensure that everyone in our care or attending our activities feel safe and free from risk of harm. The Club takes its safeguarding responsibilities seriously and we are committed to creating a safe and positive environment for everyone.

Stockport County Football Club recognises and accepts the responsibility to safeguard all adults who are using the club's facilities. It is fundamental for all adults working at the Club to safeguard and promote their welfare and are expected to provide a positive and safe environment for all.

Safeguarding practice is at the heart of all our work. Stockport County has a duty to safeguard and promote the rights and well-being of adults and to protect them from harm or risk of harm resulting from abuse, harassment, maltreatment or neglect.

The onus is on all Club representatives who are in contact with adults and they should therefore make themselves aware of the Safeguarding Adults Policy and adopt this where applicable. The policy and procedures will be widely promoted and are mandatory for everyone involved with Stockport County Football Club. Failure to comply with the Safeguarding Policy may ultimately result in dismissal from the Club and all cases will be dealt with in accordance with the clubs disciplinary procedures.

The workforce (see definitions in appendix 1), has a collective responsibility to ensure the safety and welfare of all adults engaging in activities provided by the Club. This includes taking the appropriate steps set out in this policy where there is suspicion or allegations of abuse or poor practice.

Information, advice, guidance and reporting on Safeguarding matters can be obtained through the Safeguarding Officer at Safeguarding@stockportcounty.com

Purpose and Aims

The purpose of this policy is to inform all stakeholders of Stockport County's (the "Club") safeguarding related requirements and processes. It also presents our standards and expectations to help make sure that every adult is safe and protected from harm, resulting from abuse, harassment, or neglect. (See Appendix 1 for definitions and types of abuse.)

This policy contains strategic safeguards that are proactive and protective, alongside responsive processes for managing any safeguarding-related concerns that arise. Everyone who encounters Stockport County has a responsibility to work together to safeguard adults, especially adults at risk. As such, this policy will highlight how we can all:

- ensure Stockport County is a positive environment where safety, welfare, and protection come first.
- enjoy sport, and the associated activities of Stockport County free from abuse and all forms of bullying, harassment, and discrimination; and
- use the clear pathway and requirement for any individual to report concerns. Every concern is taken seriously. The workforce of Stockport County should also be aware of how to keep themselves and their colleagues safe, maintaining professional boundaries, and avoiding behaviour that may be misinterpreted by others or be considered as 'poor practice'.
- To promote and demonstrate best practice for the safety and wellbeing of adults.
- To ensure all staff, whether full time, part time, or voluntary understand their roles and responsibilities with regards to safeguarding at the Club and what to do or who to speak to if they have a concern relating to the welfare of an adult within the organisation.

- Ensure everyone at 'The Club' is aware of the legislation, policy and procedure for safeguarding adults.
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.

Adults have the right to be protected from abuse or neglect, regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation. These can also be referred to as the nine protected characteristics, as sighted in the Equality Act 2010

Scope

This policy applies to all persons managing, delivering, or engaging with Stockport County activity in all its formats and settings, including our employees, parents / carers and third parties, including commercial partners, licence holders, contractors, consultants, and grantees.

This policy applies to all employees employed by Stockport County, which includes the Community Trust. In addition, all workers including third party suppliers and/or service providers are expected to follow this policy when they are carrying out any services on behalf of the club.

Where Stockport County enters a commercial or contractual relationship with third parties, including commercial partners, licence holders, contractors, those organisations and/or individuals are also required to uphold the requirements and principles presented in this policy.

The workforce is required to implement the requirements contained in this policy in conjunction with the Safeguarding Code of Conduct (presented as Appendix 4).

This is acknowledged by all workers at the commencement of their employment.

Whilst not an exclusive list, a list of potential settings where safeguarding measures are required is presented below.

- i. First team members / senior squads.
- ii. On trips, tours or overnight stays
- iii. Taking part in Community Trust activities.
- iv. Considered homeless people and people with mental health or health issues
- v. Contacting the club, visiting the stadiums on match days, or visiting for other pre-arranged activities e.g., events or concerts.
- vi. Attending promotional or marketing events either on-site or on off-site locations, including those operated by a third party on behalf of the club.
- vii. Those attending as volunteers or on organised work experience.

Rules & Regulations

Stockport County Football Club seeks guidance from relevant legislations, organisations and governing bodies for all safeguarding matters.

The legislation and guidance relevant to this safeguarding policy includes the following:

The practices and procedures within this policy are based on the principles contained within the UK legislation and Government Guidance and have been developed to complement the Safeguarding Adults Boards policy and procedures They take the following into consideration:

- i. The Care Act 2014
- ii. The Protection of Freedoms Act 2012
- iii. Domestic Violence, Crime and Victims (Amendment) Act 2012

- iv. The Equality Act 2010
- v. The Safeguarding Vulnerable Groups Act 2006
- vi. Mental Capacity Act 2005
- vii. Sexual Offences Act 2003
- viii. The Human Rights Act 1998
- ix. The Data Protection Act 1998

Implementation

Stockport County Football Club is committed to developing and maintaining its capability to implement this policy and procedures. In order to do so the following will be in place:

- i. A clear line of accountability within the organisation for the safety and welfare of all adults.
- ii. Access to relevant legal and professional advice.
- iii. Regular management reports to the Board detailing how risks to adult safeguarding are being addressed and how any reports have been addressed.
- iv. Safeguarding adult procedures that deal effectively with any concerns of abuse or neglect, including those caused through poor practice.
- v. A Safeguarding Team
- vi. A delegated Safeguarding Lead/Welfare Officer for events/trips/camps/ competitions.
- vii. A standing Case Management system (My Concern)
- viii. Arrangements to work effectively with other relevant organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- ix. Codes of conduct for Board members, Staff, Coaches, Officials, Volunteers and Members and other relevant individuals that specify zero tolerance of abuse in any form.
- x. Policies and procedures that address the following areas and which are consistent with this Safeguarding Adults policy.

This includes:

- i. Safeguarding Children Policy
- ii. Anti - Bullying and harassment Policy
- iii. Social Media Policy
- iv. Equality, diversity and inclusion Policy
- v. Safeguarding Code of Conduct
- vi. Managing allegations against staff policy
- vii. Whistleblowing Policy
- viii. Safe recruitment policy
- ix. ICT acceptable use policy

The Six Principles of Adult Safeguarding

The Care Act 2014 sets out the following principles that should underpin safeguarding of adults :

Empowerment

People being supported and encouraged to make their own decisions and have 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.

“I know that staff treat any personal and sensitive information in confidence, only sharing what is 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.”

Roles & Responsibilities

It is the responsibility of every member of the workforce to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all children and young people. This includes:

- i. the responsibility to provide a safe environment; and
- ii. taking the appropriate steps to ensure any suspicion or allegation of abuse, harassment, maltreatment and neglect is taken seriously and reported appropriately. The clubs workforce’s general safeguarding responsibilities are supported and guided by the club safeguarding officer.
- iii. The Safeguarding Officer is accountable for ensuring the effectiveness of this policy and our compliance with it.

The duties and responsibilities of the Safeguarding Officer are detailed below:

- i. the Club Safeguarding Policy is written and then reviewed by the club CEO, published and made available to the public; and is prepared in accordance with all statutory and regulatory requirements; once in place, it is reviewed annually by the safeguarding officer;
- ii. all members of the workforce receive a safeguarding induction and are provided with a copy of this policy and the Safeguarding Code of Conduct.
- iii. safeguarding officer has responsibility for the implementation of the safeguarding strategy;

- iv. all members of the workforce undertake appropriate safeguarding training relevant to their role;
- v. procedures are in place for dealing with allegations against members of the workforce, line with statutory guidance;
- vi. safer recruitment practices are developed and implemented to prevent individuals who may pose a risk to others from having access to any adults at risk;
- vii. policies and procedures concerning the referral of cases of suspected abuse and neglect are followed by the workforce;
- viii. all members of the workforce can raise concerns about poor or unsafe or uncomfortable practice by others and such concerns are addressed sensitively in accordance with agreed internal procedures;
- ix. appropriate referrals will be made in accordance with local protocols and timescales.
- x. relevant referrals are made within timescales to both the FA and Premier League in accordance with the regulations set out by each organisation; and where a concern relates to the Community Trust, referrals are made within timescale to the Charity Commission.

Safeguarding Contact Details

Stockport County has a Designated Safeguarding Officer who holds overall responsibility for the safeguarding of everyone at the Club. The Club also has two Safeguarding leads who represent specific areas of the Club and ultimately report back to the Designated Safeguarding Officer.

- Safeguarding Officer – Amy Heaton
- Academy Safeguarding lead– Adam Jones
- Stockport County FC Community Trust Safeguarding lead – Matthew Bailey
- Matchday Designated Safeguarding Officer – Amy Heaton
- Board member with safeguarding responsibility (Senior Safeguarding Manager) – Tom Mahon (Chief Operating Officer)

Should anybody have a concern about an adults welfare, the club safeguarding officer should be contacted for advice.

Training and Induction

Individuals joining the workforce at Stockport County are informed of the safeguarding arrangements in place, are given access to a copy of the clubs Safeguarding Policies, presented with the Safeguarding Code of Conduct and given details of the safeguarding officer and procedures for reporting concerns. All members of the workforce are expected to read and apply these key documents.

All new members of the workforce will receive safeguarding training during their induction period. This training will vary dependent on the role and interaction with children and young people.

Safeguarding personnel will receive training across wider areas of the safeguarding landscape, including good practice, e-safety, disability, neglect, domestic abuse, gang culture, substance misuse, exploitation, radicalisation, and human trafficking. In turn the safeguarding team will offer support, guidance, and training to members of the workforce who may be faced with issues and concerns through their day-to-day work.

Safeguarding Code of Conduct

In addition to the staff code of conduct, there is a safeguarding code of conduct, which is outlined in Appendix 4.

The following points are to be managed by all staff with regards to safeguarding.

- i. Stockport County Staff are to ensure that the health, safety and protection of all persons participating in a Club activity is a high priority;
- ii. All matters which raise concern must be reported in the correct procedure, which are detailed in the 'Recording Allegations' section.

Lone Working Guidance

Working one to one should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer.

Matchday Photography

By entering the Ground, all persons are acknowledging that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be taken of them and may also be used, by way of example and without limitation, in televised coverage of the game and/or for promotional, training, editorial or marketing purposes by the Club, the EFL or others (including commercial partners and accredited media organisations) and entry into the Ground constitutes consent to such use.

You further acknowledge that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be used (by the Club or by a third party, such as a law enforcement body) to identify you as an individual, where permitted by data protection laws, for the purposes of preventing or detecting crime, or any breach of these Ground Regulations. Information about the Club's use of your personal data will be brought to your attention by the Club (see for example any applicable privacy policy, signage and/or other forms of announcement in or around the ground). For further information please contact the Club.

Data Protection

In line with the Data Protection Act 1988, we will ensure:

- i. All personal and private documentation is kept in a secure location at all times.
- ii. All such documentation is only accessed by the safeguarding officers.
- iii. All information is accessible to the parent/guardian of the child or young person.
- iv. Any databases kept on PC's are security code locked with access denied to all apart from the safeguarding officers.
- v. The information is not discussed with any member of staff who is not involved.
- vi. Information is not exchanged.

Making Safeguarding Personal

'Making safeguarding personal' means that adult safeguarding should be person led and outcome focussed. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control. As well as improving quality of life, well-being and safety.

Wherever possible discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

Wellbeing Principle

The concept of wellbeing is threaded throughout the Care Act and it is one that is relevant to adult safeguarding in sport and activity. Wellbeing is different for each of us however the Act sets out broad categories that contribute to our sense of wellbeing. By keeping these themes in mind, we can all ensure that adult participants can take part in/or support football fully.

- i. Personal dignity (including treatment of the individual with respect)
- ii. Physical and mental health and emotional wellbeing
- iii. Protection from abuse and neglect
- iv. Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- v. Participation in work, education, training or recreation
- vi. Social and economic wellbeing
- vii. Domestic, family and personal domains
- viii. Suitability of the individual's living accommodation
- ix. The individual's contribution to society.

Identifying & Raising Concerns

Despite the Safeguarding Policy being in place and the Club encouraging best practice, there may be instances when concern is raised over the treatment of an adult.

Stockport County adheres to safeguarding procedures that have been agreed with Stockport Council's Safeguarding Partnership. Stockport County also applies the regulatory safeguarding requirements of the Football Association and the English Football League, in relation to the reporting of relevant allegations, complaints, and incidents.

Everyone at Stockport County is advised to maintain an attitude of 'it could happen here' where safeguarding risk is concerned. When concerned about the welfare of an adult, members of the workforce should always act in the best interests of the individual and have a responsibility to take action as outlined in this policy (see Appendix 5 - responding to concerns flowchart).

A person can describe Abuse as a violation of an individual's human and civil rights by another person or persons.

Abuse may take the form of physical injury, sexual or emotional abuse, financial abuse or neglect. Anybody in contact with an adult at risk may cause harm, for example but not limited to; carers, relatives, friends, general public. (Please see Appendix 1 for definitions and types of abuse).

An adult at risk may share with others that they have been abused. This can happen in a variety of ways including.

- Directly: Telling someone what has happened to them
- Indirectly: Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries, or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of revealing abuse and we will ensure that appropriate action is taken to support and protect. At Stockport County,

We are committed to this practice in a way that protects them by responding to the 5 R's of safeguarding.

Recognise - Signs and symptoms of abuse.

Respond - An allegation from an adult at risk against a member of staff/volunteer, a disclosure from an adult at risk, suspicions regarding the conduct of other staff members or concerns from a staff member.

Report - To the Clubs safeguarding team, it is their responsibility to make further decisions.

Record - Exactly what has happened using the words said. This should be completed on 'My Concern'.

Refer - This will be the role of the Designated Safeguarding Officer who will make all further decisions. This may be to the police or the local authority.

Signs and Indicators of Abuse and Neglect

An adult may confide to a member of staff, coach, volunteer or another participant that they are experiencing abuse inside or outside of the organisation's setting. Similarly, others may suspect that this is the case.

There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms 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. 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.
- Someone losing or gaining weight / an unkempt appearance. This could be a player whose appearance becomes unkempt, does not wear suitable sports kit and there is a deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions in contrast to their personal assistant whom they greet with a smile.
- Self-harm.
- A fear of a particular group of people or individual.
- A parent/carer always speaks for the person and doesn't allow them to make their own choices
- They may tell you / another person they are being abused – i.e. a disclosure

Responding to Concerns

Safeguarding concerns usually fall into one of the following categories:

- i. the behaviour of an adult (member of the workforce or otherwise) towards another individual or;
- ii. the behaviour of an individual towards others (including abuse and bullying by peers);
- iii. risks identified through recruitment processes (e.g. criminal records information);

- iv. risks identified through other regulated processes – such as Health & Safety or medical requirements;
- v. information about an individual provided by statutory agencies or other relevant organisation (such as an allegation or conviction related to an individual's private life);
- vi. concerns about harm to an individual that has taken place outside of Stockport County activity (e.g. at home or school) but identified within a Stockport County activity.

A referral may be justified by a single safeguarding-type incident, such as harm or risk of harm resulting from an injury (See Appendix 3, for support with responding to a disclosure). However, concerns may also accumulate over a period and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In all instances it is crucial that all concerns are passed on in accordance with this policy to allow the safeguarding team and the relevant authorities to respond and intervene with support at the earliest opportunity.

All workers are obliged to report incidents or concerns of malpractice where the law, club policy or protocol has been breached by any member of the workforce. Failure to do so may result in disciplinary action.

It is not the responsibility of any individual to investigate safeguarding or welfare concerns or determine the viability of any disclosure or allegation. All workers are expected to have the ability to recognise potential harm or risk resulting from potential abuse or poor practice and have a duty to share those concerns in accordance with the procedures outlined in this policy.

Anyone who receives a disclosure of abuse or suspects that a person is at risk of harm, must report it immediately to the safeguarding officer.

Following receipt of any form of safeguarding-related concern, the safeguarding officer will consider the information received and decide what action to take in accordance with this policy. All information and actions taken, including the reasons for any decisions made, will be recorded. If the allegations relate to an employee's conduct, the subsequent action will apply both HR disciplinary processes and safeguarding-related requirements and require a collaborative approach to the management of the concern.

Where serious concerns are raised and/or a criminal offence may have been committed then the relevant authorities will be informed. Where the Police decide that they will not take any further action, the local authority may still proceed with an investigation in conjunction with the club. The initial role of the Safeguarding Officer is to pass the information on to the relevant person or agency, in an efficient, timely and confidential manner. Where both the Police and social care services have decided to take no further action, Stockport County may undertake an internal investigation and involve relevant internal stakeholders.

In these instances, a Referral Management Group ("RMG"), should be convened. See Appendix 2 for more information around an RMG. Where serious concerns are raised, the Safeguarding Officer must be informed at the earliest opportunity as well as the Head of People.

If a member of the workforce is removed (or resigns before being removed) 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 Disclosure and Barring Service will be made in conjunction with the appropriate statutory agencies and the Football Association.

The safeguarding team will always respect the right of an individual to have their say when a decision that affects them is being taken and will take their views into account, acting in their best interests when a decision is made.

If at any point there is serious harm, or risk of serious harm, to a person, anybody can refer to emergency services or statutory agencies and should do so as soon as possible. In such circumstances, the individual should refer to the consent section of this policy, for information of whether consent is required.

Any member of the workforce who does not feel that concerns about an individual have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the Safeguarding Officer or the board member with safeguarding responsibility, which for Stockport County is the Chief Operating Officer. Alternatively, members of the workforce can contact the Head of People to raise their concerns. These concerns may potentially be dealt with through the Grievance or Whistleblowing policies. If any member of the workforce does not feel the situation has been addressed appropriately at this point, they should contact the Local Authority Adult Services directly with their concerns.

Stockport County also applies the regulatory requirements of the Football Association and English Football League for the reporting of safeguarding concerns where their thresholds are met – these are further detailed in the relevant regulations.

Case Management

All safeguarding concerns relating to Adults at Risk are to be recorded on 'My Concern', which is the Clubs system to record safeguarding concerns, incidents and outcomes. All relevant staff throughout the Club will have access to 'My Concern'.

Case Management actions to include:

- i. to authorise any actions already taken by the Safeguarding Team.
- ii. to initially assess and agree immediate response to a safeguarding concern.
- iii. to identify appropriate 'route' for case (e.g. internal/ disciplinary action alone or referral to statutory agencies plus internal/ disciplinary action).
- iv. to decide the level (from internal or local to national) at which the organisation will deal with the concern.
- v. to review progress of case(s).
- vi. to identify/ communicate learning from cases.

The senior management team and Stockport County Football Club Board should receive regular reports from the Safeguarding Officer summarising the cases that have been addressed and their outcomes, as well as any issues that require action by Stockport County Football Club e.g. changes to policy or procedures.

Low Level Concern

It has been recognised by the Club that there is a need to manage issues that fall under the umbrella of safeguarding, including those which are considered to be of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club.

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'Nagging doubt', that a person may have acted in a manner inconsistent with the Club's Safeguarding Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour. By reporting such concerns, it helps us to build a picture and potentially identify and resolve issues before any child, young person or vulnerable adult is subject to abuse or harm. Low Level Concerns where no emergency actions are required, should be managed internally, and recorded within the 'My Concern' electronic Safeguarding management system.

Whistleblowing

Whistleblowing in a safeguarding context means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it. It can be used as an early-warning system or when it is recognised that appropriate actions have not been taken.

Both Stockport County Football Club and Stockport County Community Trust, have applicable 'Whistleblowing' policies and procedures.

Any adult or young person with concerns about a staff members conduct can also use whistleblowing by calling 0800 169 1863 and asking for The FA's safeguarding team, or via email to: safeguarding@TheFA.com.

Definitions of Poor Practice and Abuse

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of Poor Practice. An adult at risk may not be aware that poor practice or abusive is taking place, as they may deem the behaviour as acceptable.

Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of a single act or repeated acts. It may be physical, financial, verbal or psychological or an act of neglect or omission to act. It may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which s/he has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Some examples of abuse within sport include:

- Harassment of a participant because of their (perceived) disability or other protected characteristics.
- Not meeting the needs of the participant e.g. training without a necessary break.
- A coach intentionally striking an athlete
- One elite participant controlling another athlete with threats of withdrawal from their partnership
- An official who sends unwanted sexually explicit text messages to a participant with learning disabilities.

Please see Appendix 1 for further definitions of abuse in relation to adult safeguarding

Mental Capacity in Relation to Adults at Risk

The Mental Capacity Act 2005

The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the safeguarding process must comply with the Act.

The Act says that: "...a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."

The presumption is that adults have mental capacity to make informed choices about their own safety and how they live their lives.

All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take. It is not for Nottingham Forest Football Club staff or volunteers to make a decision about whether an adult at risk lacks capacity, but it is useful for professionals to have an understanding of the notion of capacity as explained below.

Definition

Capacity is the ability to make a decision at a particular time. 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. The term 'lacks capacity' means a person who lacks judgement or understanding to make a particular decision or take a particular action for them at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves but will have capacity to make other decisions. I.E they may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decisions about financial matters. It also reflects that a person who lacks capacity to make a decision at a certain time may be able to make that decision at a later date – this may be due to illness or accident.

Mental Capacity and Safeguarding

We make so many decisions that it is easy to take this ability for granted. The Law says that to make a decision we need to:

- Understand information
- Remember it for long enough
- Think about the information
- Communicate our decision

A person's ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.

Most adults have the ability to make their own decisions given the right support however, some adults with care and support needs have the experience of other people making decisions about them and for them.

Some people can only make simple decisions like which colour T-shirt to wear or can only make decisions if a lot of time is spent supporting them to understand the options. If someone has a

disability that means they need support to understand or make a decision then such support must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called “lacking mental capacity”.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person's mental capacity can change. If it is safe/possible to wait until they are able to be involved in decision making or to make the decision themselves.

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision during a panic attack.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

Mental Capacity is important for safeguarding for several reasons.

Not allowing an individual to make decisions they are capable of making is abuse. For example, a disabled adult may want to take part in an activity but their parent who is their carer won't allow them to and will not provide the support they would need to attend.

Another situation is where an adult is being abused and they are scared of the consequences of going against the views of the person abusing them. It is recognised in the law as coercion and a person can be seen not to have mental capacity because they cannot make 'free and informed decisions'.

Mental Capacity must also be considered when we believe abuse or neglect might be taking place. It is important to make sure any adult has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened. However, in some situations the adult may not have the mental capacity to understand the choice or to tell you their views.

Many potential difficulties with making decisions can be overcome with preparation. A person needing support to help them make decisions whilst taking part in a sports organisation will ordinarily be accompanied by someone, for example a family member or formal carer, whose role includes supporting them to make decisions.

It is good practice to get as much information about the person as possible. Some people with care and support needs will have a 'One page profile' or a 'This is me' document that describes important things about them. It is also important to have an agreement with the person who has enrolled the adult in the sports activity about how different types of decisions will be made on a day to day basis.

If a person who has a lot of difficulty making their own decisions is thought to be being abused or neglected, you will need to refer the situation to the Local Authority and this should result in health or social care professionals making an assessment of mental capacity and/or getting the person the support they need to make decisions.

There may be times when a sporting organisation needs to make decisions on behalf of an individual in an emergency. Decisions taken in order to safeguard an adult who cannot make the decision for themselves could include:

- Sharing information about safeguarding concerns with people that can help protect them.

- Stopping them being in contact with the person causing harm.

Consent Issues

If concerns arise, consent must be obtained from the individual concerned before a referral is made to Adult Services or the police. However, if others are at risk of harm the information should be passed to Adult Services or the police even if consent is not obtained. Information about an individual should not be given to family or carers without consent of the individual. If concerns arise and the individual is unable to give consent to information sharing a referral should be made to statutory agencies. Family/carers should only be informed if this does not place the person concerned at risk of harm. Staff should seek guidance from the Club safeguarding officer if they are unsure. The circumstances when we need to share information without the adult's consent include those where:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- you believe they or someone else is at risk, including children.
- you believe the adult is being coerced or is under duress.
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- the adult does not have mental capacity to consent to information being shared about them.
- the person causing harm has care and support needs.

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

Recording and Information Sharing

All safeguarding incidents or concerns should be recorded on the club's safeguarding reporting tool, 'My Concern'. If staff or volunteers are unable to access this, a written record should include the following information:

- Provide a factual account of what you have been told or observed, use the words given to you.
- Record any questions you asked in the exact words you used.
- The date and time of what you have witnessed or been told.
- Details of those involved: Person/s whose safety and welfare there are concerns about,
- alleged perpetrator of abuse or person/s whose behaviour or actions there are concerns about
- witnesses
- any third party who has raised concerns.
- Action taken and your rationale for taking such actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer.

Staff and volunteers are expected to:

- Provide clear, concise and relevant information.

- Record information in an objective and professional manner.
- Record information of fact rather than assumption of what you have witnessed or been told.
- Record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe bruises, marks, or injuries. If more information is recalled later, this should be added as an addendum. The original record must not be changed.

Staff and volunteers should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

Stockport County takes the matter of data protection and privacy very seriously and particularly the data collected in respect of children. Stockport County complies with the relevant legislation namely the Data Protection Act 2018 (DPA) and the General Data Protection Regulations (GDPR).

Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping and this means records relating to safeguarding concerns must be accurate and relevant and they must be stored confidentially.

Sharing information with the right people, is good practice in safeguarding adults, however, information sharing must only ever be with those with a 'need to know'. This does **not** automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe (see consent section).

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation
- Case management meetings can take place to agree to co-ordinate actions by the organisation

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

Stockport County will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously and carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed to identify patterns of behaviour that may give rise to concern. The Safeguarding Officer may be required to report or refer these matters to another agency such as the English Football League, Football Association, police or Local Authority.

Information and Communication Technology

ICT is used across Stockport County operations in many and varied ways. The use of ICT will continue to grow and change with new developments in technology. It is used to communicate across the workforce, as well as with supporters, customers, players, and the media. The Club will:

- i. develop and maintain clear policies on suitable and appropriate use of internet and social media.
- ii. expect the workforce to only use Stockport County issued equipment, emails, and software to communicate with participants.
- iii. ensure that consent of parents is obtained if the workforce will use SMS, email, or other electronic means of communication with a child for programme-related reasons.
- iv. raise awareness amongst young participants (especially youth academy players) regarding safer internet/social media use in respect of their position as participants, players, role models and future professional players.
- v. raise awareness, through training and internal communications, with the workforce regarding appropriate use of such media and the importance of both professional and personal online activity.
- vi. have a zero-tolerance approach to 'cyber-bullying' (in line with the club's prevention of bullying and harassment policy).
- vii. respond quickly and appropriately to inappropriate use of the internet and social media by participants, those with parental responsibility and members of the workforce.

Support for Staff & Volunteers Dealing with Safeguarding Information

Dealing with a safeguarding incident may have an impact on the wellbeing of all those involved. It is important that anyone affected seeks help if they feel that they need support. Staff and volunteers can contact a club Mental Health First Aider who will help in signposting to access appropriate support.

Discriminatory Abuse

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation, or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

Kick it Out

We will refer all race discriminatory abusive incidents within our environment to Kick it Out in line with existing EFL protocols. This organisation will provide the necessary support to anyone affected by the incident.

Charity Commission

The Charity Commission is the statutory regulator of charities in England and Wales. Our Community Trust is required to report serious incidents, which include safeguarding issues, to the Charity Commission. Government guidance states that if a serious incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the

police. The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations.

Multi-Agency Working

Safeguarding adults' legislation gives the lead role for adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations.

Sports bodies may need to cooperate with the Local Authority and the Police including to:

- Provide more information about the concern you have raised.
- Provide a safe venue for the adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Provide a safe environment for the adult to continue their sporting activity/ their role in the organisation.

Key Contacts and Resources

Club Safeguarding Officer and Matchday Safeguarding Officer

Amy Heaton

safeguarding@stockportcounty.com / amy.heaton@stockportcounty.com

Academy Head of Player Care (Academy Designated Safeguarding Lead)

Adam Jones

Adam.jones@stockportcounty.com

Community Trust Community Partnerships Manager (Community Trust safeguarding Lead)

Matthew Bailey

m.bailey@stockportcounty.com

Chief Operating Officer / Senior Safeguarding Manager (Board member with Safeguarding responsibility)

Tom Mahon

Tom.mahon@stockportcounty.com

Other Useful contact numbers

Stockport Police	Emergency 999/ Non-Emergency 101
Stockport Council Multi Agency Safeguarding Hub	0161 217 6028
Stockport Council – Out of hours	0161 718 2118

Resources

The Football Association

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

Ann Craft Trust (ACT)

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector Tel: 0115 951 5400

Email: Ann-Craft-Trust@nottingham.ac.uk

www.anncrafttrust.org

Men's Advice Line

For male domestic abuse survivors

Tel: 0808 801 0327

National LGBT+ Domestic Abuse Helpline

Tel: 0800 999 5428

Rape Crisis Federation of England and Wales

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

Email: info@rapecrisis.co.uk

www.rapecrisis.co.uk

Stop Hate Crime

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

24 hours service:

Telephone: 0800 138 1625

Web Chat: www.stophateuk.org/talk-to-us/

E mail: talk@stophateuk.org

Text: 07717 989 025

Text relay: 18001 0800 138 1625

By post: PO Box 851, Leeds LS1 9QS

Victim Support

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

Tel: 0808 168 9111

www.victimsupport.com

Women's Aid Federation of England and Wales

Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service.

Links with Other Policies

This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below additional policies in place that underpin our safeguarding practice:

- i. Whistleblowing Policy
- ii. Safer Recruitment Policy
- iii. Safeguarding Code of Conduct (Appendix 4)
- iv. Anti-bullying and harassment Policy
- v. Managing Allegations against Staff Policy
- vi. Social Media Policy
- viii. ICT Acceptable Use Policy
- ix. Equality, diversity and inclusion policy

Date and Review

This safeguarding policy is reviewed annually, the next review will be in 2024.

Effective Date	November 2023 – First version
Written By	Amy Heaton – Safeguarding Officer
Approved By (Board)	Jonathan Vaughan - CEO
Review Date	November 2024
Update responsibility	Safeguarding Officer

Review History

Number	Date	Review details	Authorised by (Board)
1	November 2023	Development & Creation of Document	JV Nov 23

Appendix One – Key Safeguarding Terminology and Definitions

Key Safeguarding Terminology and Definitions:

Adult is anyone aged 18 or over.

Adult at Risk is a person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and;
- Is experiencing, or is at risk of, abuse or neglect.
- 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.

Adult in need of care and support is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors. Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse.

In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors. In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

Abuse is a violation of an individual's human and civil rights by another person or persons.

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).

The Club – refers to Stockport County Football Club, its staff and all activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The Trust - refers to Stockport County Community Trust, its staff and all activities it undertakes. In certain circumstances, it may also refer to third parties with an entrusted responsibility for delivering club supported activity.

Workforce / Staff – refers to persons employed by and receiving payment for services from the Club or Trust. This is irrespective of the length or nature of their contract.

Volunteers – persons who freely offer their skills and expertise or take part in a task, event or enterprise with the club or charity at their own expense in terms of time and/or resources.

Child – Defined in the Children's act (1989) as any person under the age of 18.

Safeguarding – Preventative and reactional measures taken by the Club and Charity to ensure; the risk of harm or mistreatment to the welfare of Vulnerable Groups is minimised; the health or wellbeing of Vulnerable groups is not impaired when engaging in Club or Charity related activities; an environment exists that allows Vulnerable groups to be cared for safely and allows for the best possible outcomes for them and provides them with the best life chances possible.

Welfare – The health, happiness and fortunes of an individual and the humanitarian aspects of their life including personal need and physical and mental development.

Rules, Regulations and Guidance - The Club is governed by the legislation and rules/ regulations set out by several key governing agencies including the Government, Football Association and EFL.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour 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. 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.

Domestic Abuse and coercive control – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.

Discriminatory Abuse – 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.

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.

Physical Abuse – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

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.

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.

Indicators of financial abuse include:

- Change in living conditions
- Possessions sold

- Inability to pay bills/unexplained shortage of money
- Unexplained withdrawals from an account
- Unexplained loss/misplacement of financial documents
- Isolation from family/friends/social network
- Carer's enhanced lifestyle
- Sudden changes in bank account or banking practice
- Unauthorised withdrawal of funds using the vulnerable person's ATM card, or changes in patterns of usage.
- Sudden or unexpected changes in a will or other financial documents.

The above are illustrations of potential indicators of abuse. It does not mean that it is proof of actual abuse but may require further scrutiny. It is not an exhaustive list.

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.

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.

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.

Forced Marriage – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. The forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.

Mate Crime – a 'mate crime' as defined by the Safety Net Project as '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 a number of 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 – 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.

Remember: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.

Appendix Two – Referral Management Group

Stockport County requires those involved with the club to develop clear procedures for the response to concerns reported to the safeguarding team, as a result the club have developed its own policy for the management of reported safeguarding concerns and/or allegations.

The Referral Management Group (RMG) process is one key element of that which draws together relevant stakeholders from across the business to allow for an effective response in these circumstances.

Criteria:

- Where a concern is raised relating to the behaviour of a member of the workforce, there is a need to manage that referral in a swift and confidential manner.
- Serious concern that requires swift and confidential input from across the club.

The RMG will:

- not replace an immediate referral to the emergency or statutory agencies where a potentially criminal offence has taken place;
- not replace, but work in tandem with, the club's staff disciplinary policy;
- meet at the earliest convenience and need not necessarily meet face-to-face;
- comprise a minimum of three people from;
 - Safeguarding Officer.
 - Line Manager.
 - Head of people.
 - Board member with Safeguarding Oversight.
- Protect the identity of the complainant where requested or appropriate (though this is not always possible for the complete duration of the disciplinary process or where criminal investigation is required);
- Consider the suspension of any member of the workforce (through Head of People and note any actions taken by the Football Association);
- Keep the complainant informed over the progress of the referral unless this may jeopardise the fairness of the process; and
- Record and store in a confidential manner, the details of the matter and any meetings relating to the referral.

The RMG will consider the facts of the concern or allegation and may either:

- refer to Head of People or line manager, and/or to the clubs disciplinary policy process; and/or
- conduct its own investigation (and where the 'accused' is not permanent staff) using an independent member of staff; and/or
- make an external referral to statutory agencies or regulators; or
- take no further action.

Where an investigation has taken place and the RMG must consider the evidence presented to them, the burden of proof used to decide on an outcome will be 'balance of probability' (i.e. more likely than not)

Appendix Three – Responding to a Disclosure

When working with children and young people, all members of the workforce need to be alert to the possibility that safeguarding concerns may arise. A child needs to have someone they can trust to feel able to disclose abuse they may be experiencing. They need to know they will be believed and will get the help they need. Without these things they may be vulnerable to continuing abuse.

You should deal with disclosures of abuse sensitively and professionally. The following approach is suggested as best practice for dealing with these disclosures. The role of any workers having potential abuse, bullying or poor practice, is to pass it on to the appropriate person.

Recognise

Appreciate that you are in receipt of a disclosure. Ensure that you create a space in which the individual disclosing can feel comfortable and safe to explain their concerns.



Respond

- React calmly
- Listen carefully and attentively
- Take the child seriously
- Reassure the child that they have taken the right action in talking to you
- Do not promise to keep anything secret
- Ask questions for clarification only. Do not ask leading questions
- Check back with the child that what you have heard is correct and understood
- Do not express any opinions about the alleged abuser
- Ensure that the child understands the procedures that will follow



Refer

- Contact a member of the safeguarding team
- Where the child is at immediate risk of harm keep them with you until advised otherwise by a member of the safeguarding team, emergency services or the Local Authority.



Record

- Make a written record of the conversation as soon as possible, in as much detail as possible
- Record concern on 'My Concern' and alert the Safeguarding Officer within 24 hours.

Appendix Four – Safeguarding Code of Conduct

Everyone plays a role in safeguarding the welfare and development of children and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a Stockport County activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your priority** and ensure that any planning, preparation, delivery, or review reflects this duty, and all actions are in the best interests of those in your care.
- **Treat children and other vulnerable people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation, or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children and vulnerable people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort** as well as performance.
- **Only use physical contact with participants where necessary.** If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the child what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.
- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is strictly prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour, and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a player's welfare.
- **Not appear to favour one child** or show interest in one child more than another.
- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know) This may be your line manager or designated safeguarding officer.

It is everyone's responsibility to uphold this Code. Any breach of the Code is likely to lead to disciplinary action and in some cases a criminal prosecution.

Appendix Five – Responding to a concern, incident or an allegation flowchart

The flowchart presented below details the immediate response to an incident or concern involving a child or other vulnerable person.

A child or other vulnerable person* has shared concerning information with you OR
you have witnessed or had reported to you an incident or complaint involving a child or other vulnerable person*, which may be
considered abuse or poor practice.

*It is essential when considering an incident or concerns involving an adult who may be vulnerable to obtain the consent of that adult before referring the matter to a statutory agency, unless there is an immediate risk of harm.

STAY CALM – REASSURE – TAKE SERIOUSLY – NO PROMISES – FEW QUESTIONS – FOLLOW GUIDE – MAKE RECORD

