



Blackpool FC Community Trust

Safeguarding Adults at Risk Policy

September 2018

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1. INTRODUCTION

At Blackpool Fc Community Trust the safety and welfare of our adults at risk is of the utmost importance. Because of the day-to-day contact with adults at risk, our staff are well placed to observe signs of abuse. All staff working for Blackpool FC Community Trust must protect adults at risk from harm and abuse and be aware that any adult at risk may be at risk of harm or abuse. We have a duty to safeguard and promote the welfare of our adults at risk (*a person over 18 years with needs for care and support*) by identifying any welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

The purpose of this safeguarding adults at risk policy is to set a clear protocol of action and framework for our responsibilities and legal duties in relation to each adult at risk's welfare. The Care Act 2014 sets out, a clear legal framework for how local authorities and health, civil and criminal justice systems should protect adults at risk of abuse or neglect. This Policy, Procedure & Guidance document incorporates relevant content of both the Care Act 2014 and its associated regulations and guidance. The Care Act supersedes the Department of Health publication "No Secrets" (2000). The hope is to ensure a reliable and effective response in the event of any concern for a child's welfare, and to support each child.

We aim to put adults at risk's needs first at all times. We hope to encourage adults at risk to be confident and assertive. We aim to develop a positive, trusting, and respectful relationship with adults at risk in our care, so that they know they will be empowered, listened to and believed.

Our policy applies to all staff and volunteers working for Blackpool FC Community Trust.

In addition to our safeguarding adults at risk policy, we have policies to cover health and safety, anti-bullying, whistle-blowing, safe working practice (ethics), complaints and appeals and equality and diversity.

These policies can be accessed at: [Policies](#)

2. ADULTS AT RISK SAFEGUARDING POLICY STATEMENT

2.1 Scope of Policy

This Adults at risk Safeguarding Policy is intended to cover all functions and services of Blackpool FC Community Trust where there is the potential for direct or indirect contact with adults at risk.

Officers of the Trust, relevant staff and volunteers who carry out work for Blackpool FC Community Trust, and relevant staff and organisations who work in partnership with the Trust, should all be committed to practices which protect adults at risk from harm.

2.2 Equality and Diversity

At Blackpool FC Community Trust, we are committed to ensuring equality of opportunity for all pupils, staff, parents and carers irrespective of age, gender, disability, religion or belief, sex, sexual orientation, race or racial group, caring responsibilities, class, culture, language, pregnancy and marital or civil partnership status. We aim to develop a culture of inclusion and diversity in which all those connected to the Trust feel proud of their identity and ability to participate fully in our activities.

It is every person's human right to live a life free from abuse and neglect. Every adult at risk has an equal right to support and protection within these procedures regardless of their individual circumstances or differences. We tackle discrimination through the positive promotion of equality, by challenging bullying and stereotypes and by creating an environment which champions respect for all. BFCCT Equality and Diversity Policy outlines the Trust's commitment to Equality and Diversity.

2.3 Who is an adult at risk?

An adult at risk is someone who:

- Is aged 18 or over;
- Has needs for care and support (whether or not the local authority is or may be meeting any of those needs) and;
- As a result of those care and support needs is unable to protect themselves from either;
 - The risk of, or
 - Experiencing abuse or neglect.

An adult at risk would include therefore an adult who is unable to protect themselves as a result of their care and support needs, and for example:

- Is an older person who is frail due to ill health, physical disability or cognitive impairment
- Someone who has a learning disability
- Someone who has a physical disability and/or a sensory impairment

- Has mental health needs including dementia or a personality disorder
- Has a long term illness / condition
- Misuses substances / alcohol
- Is a carer such as a family member or friend who provides personal assistance and care to adults and is subject to abuse
- Lacks the mental capacity to make particular decisions and is in need of care and support.

****This list is not exhaustive****

2.4 Values and Principles Underpinning this Policy:

In line with Blackpool Safeguarding Adults Board *Multi-Agency Safeguarding Policy and Procedures (2015)* Blackpool FC Community Trust adheres to the following six principles:

Empowerment – People being supported and encouraged to make their own decisions

“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.”

These principles are in place to inform Blackpool FC Community Trust staff of the way they work with adults at risk.

2.5 Aims of the policy

The aims of this policy are to ensure that staff at BFCCT:

- Work to stop abuse wherever possible by raising a concern
- Safeguard adults in a way that supports them in making choices
- Promote an approach that focusses on improving life for the adults participating in the trust's programmes
- Work in partnership to play their part in identifying and responding to abuse and neglect

In order to achieve these aims it is necessary to:

- Ensure that all staff are clear about their roles and responsibilities
- Work together to provide an effective response to concerns
- Develop a positive environment for participation that encourages adults at risk to be confident to confide in BFCCT staff
- Provide opportunities for staff to access relevant safeguarding training to inform practice
- Be clear on how to respond to safeguarding concerns using the procedures provided and having awareness of other policies related to safeguarding practice

Related [Policies](#) include:

- Managing allegations against staff and volunteers
- Complaints and Appeals
- Anti-Bullying
- Safer Working practice
- Whistleblowing
- Data Protection
- Social media and use of images
- Peer on peer abuse

2.6 Making Safeguarding Personal

In addition to these aims and principles, it is also important that all staff prioritise safeguarding as part of their day to day work. It is important that all staff recognise that adult safeguarding is there to protect individuals.

Making safeguarding personal means it should be person-led and outcome focussed. It engages the person in a conversation about how best to respond to their safeguarding situation to enhance involvement, choice and control, as well as improving quality of life.

BFCCT have a fundamental duty to protect its participants from harm if the staff suspect or are made aware of abuse or neglect. This especially important where an adult with care and support needs is at risk of serious harm, from which they are unable to protect themselves or others that are at risk. In this circumstance, consent can be overridden.

2.7 Management Roles and Responsibilities:

The Chief Executive of Blackpool FC Community Trust has ultimate responsibility for ensuring compliance with this policy. A member of Blackpool FC Community Trust's Board of Trustees has been assigned the role of Trust Senior Safeguarding Manager (SSM) to ensure that there is a buy in at board level. The SSM, will take this role and ensure that safeguarding is present on the agenda at board meetings.

Day to day responsibility for implementation is delegated through the management structure from senior officer to delivery staff and volunteers.

Blackpool FC Community Trust has a Designated Safeguarding Officer (DSO), who is responsible for acting as a central contact point for reporting concerns and a source of advice on adults at risk safeguarding matters. The DSO will communicate all safeguarding concerns to the board and work closely with the SSM to follow the procedures set out in this policy.

Designated Safeguarding Officer (BFCCT): Selina Hayes

Designated Safeguarding Officer (BFC Academy): Will Cowell

Board of Directors Safeguarding Representative/Senior Safeguarding Manager (Trust):
Carolyn Singleton

Designated Safeguarding Officer role description appendix 7

Senior Safeguarding Manager role description appendix 8

Blackpool FC Community Trust (DSO) - 01253 348691

2.8 Staff and Volunteers Roles and Responsibilities:

Staff members and volunteers have a duty to adhere to the Adults at Risk Safeguarding Policy and to notify the DSO on any matter regarding safeguarding adults at risk.

Staff are expected to follow the Staff Code of Conduct (Appendix 4) and thus adhere to the BFCCT terms of expected behaviour.

Staff and volunteers are also responsible for ensuring that they undertake relevant training identified for their post.

All staff and volunteers have a responsibility to report poor practice or any concerns regarding staff and volunteers both internally and from external organisations. This is in line with the Blackpool FC Community Trust whistleblowing and complaints and appeals policies.

2.9 Training:

All Blackpool FC Community Trust employees are expected to complete formal safeguarding training.

Staff will also be provided with access to relevant Safeguarding training relevant to their role including EFLT, FA and [Lancashire Safeguarding Board](#) training.

Staff are required to bring a copy of their safeguarding certificates to hold in staff files.

All staff will undertake an internal safeguarding workshop during their first week in their new role. Topics covered within this workshop include signs and indicators, types of abuse and the reporting procedures within BFCCT. Staff will also undertake Safeguarding Awareness training through BrightHR (CPD accredited).

Staff will undertake safeguarding training a minimum of once per year (internally) and renew Safeguarding training on a three-year cycle.

2.10 Programmes covered by this policy

<ul style="list-style-type: none">● Every Player Counts:<ul style="list-style-type: none">○ Adult Pan-ability○ Get Set to Go/Goal in Mind○ Unified football● Veterans:<ul style="list-style-type: none">○ Veterans coffee morning○ Veterans breakfast club○ Veterans walking football○ Veterans 5 a-side	<ul style="list-style-type: none">● Extra-time● DIVERT (see DIVERT policy document)● Walking Football● Sporting Memories (see 8.1)● Fit Fans● Changing rooms● Traineeships● Re-Play● Pool Together
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3. RECRUITMENT AND SELECTION OF STAFF

Blackpool FC Community Trust will operate established recruitment and selection procedures for positions where there is significant contact with adults at risk. These will include employment reference checks and the completion of an Enhanced DBS and FA Criminal Record Check (CRC).

Blackpool FC Community Trust will take all reasonable steps to ensure that in its recruitment and selection of staff it will pay due regard to ensuring that:

- There is a clear job description for staff/volunteers and person specification outlining key skills and abilities required. Safeguarding expectations form part of every **job description**.
- There is an open recruitment process.
- There is a process that covers past work.

- There is a declaration requesting information on previous convictions and investigations, if any.
- There is an interview process suitable to the role and task.
- Written references are sought and received (and followed up if necessary).
- Where required an FA Criminal Record Check (CRC) will be carried out.
- The post has been approved by management / the board of trustees.

The Rehabilitation of Offenders Act 1974 and Protection from Freedoms Act 2012 will be considered in all cases before a final decision is made. In all cases where the act applies, BFCCT will follow the procedures set out in the BFCCT Recruitment of ex-offenders policy.

We keep a central record of all staff with the reference number, date and outcome of their Disclosure & Barring Service (DBS) Enhanced disclosure.

Senior staff will receive training in Safer Recruitment.

All new employees, workers or volunteers working with children or young people at the Community Trust will be required to complete an induction before commencement of duties.

The full recruitment process is provided in the BFCCT Recruitment and Selection Policy.

4. PROVISION OF SERVICE

4.1 Where Blackpool FC Community Trust Directly Provides a Service:

The following are areas of activity which are especially relevant in the present context:

- Effective management practices and effective working practices (including the establishment of safeguards through the organising of work).
- The promotion of awareness and sensitivity in relation to adults at risk safeguarding issues.
- Formal training on adults at risk safeguarding issues. Where training can't be facilitated it will be delivered by the appropriate training provider (LFA / 1st for Sport).
- Internal reporting arrangements in relation to any 'disclosures', or any apparently well-founded 'concern' in respect of an allegation of relevant misbehaviour on the part of a member of staff or volunteer.
- The Trust supports external reporting (and the waving of confidentiality) in respect of relevant 'disclosures and relevant apparently well-founded concerns', which are made to staff, regardless of whether such disclosure or concerns relate to the alleged misbehaviour of a staff member, volunteer or another person.
- Ensuring that all provision provided has the procedures in place to ensure the safety and welfare of our participants is integral to all we do. This includes having behaviour codes of conducts, gaining consent to take part and for the use of images and ensuring any trips and residentials adhere to the correct procedure set out in the BFCCT Trip and Residential Policy.

4.2 Where Blackpool FC Community Trust works with third Party Organisations – Due Diligence:

Blackpool FC Community Trust requires all partners, groups and organisations that use its premises or services to have an acceptable Adults at Risk Safeguarding Policy in place. If they do not have their own policy, as a minimum requirement, all such organisations must accept and apply the standards outlined in this policy. A copy of this policy is available upon request or at <http://www.blackpoolfccommunitytrust.co.uk>

BFCCT will inform delivery partners that the Trust has policies and procedures in place in order to report concerns.

BFCCT will always ensure that delivery partners, namely when commissioning, have the required insurance(s), DBS checks have been performed on staff and that the organisation has thorough safeguarding procedures (Due Diligence Policy)

The importance of safeguarding is embedded into all Blackpool FC Community Trust service level agreements to ensure all partners acknowledge responsibility for safeguarding adults at risk and that BFCCT will always follow its own procedures where there is doubt or lack of clarity.

5. WHAT IS ABUSE OF ADULTS AT RISK?

5.1 What is abuse and neglect?

For the purposes of this policy and procedures the term **'abuse'** is defined as:

"...a violation of an individual's human and civil rights by any other person or persons which results in significant harm"

(Department of Health, "No Secrets" 2000).

As an organisation we should not limit our view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered; although the adult must be an adult at risk (as described above) before the issue is considered as a safeguarding concern.

Abuse may consist of:

- a single or repeated act
- an act of commission or omission
- multiple acts, for example, an adult at risk may be neglected and also being financially abused
- a pattern which involves more than one person

Abuse may be intentional or unintentional. It may involve the misuse of power and control that one person has over another. Some abusive acts or omissions are crimes, and informing the police must be a key consideration.

The term **'harm'** is described in No Secrets as involving:

- Ill treatment (including sexual abuse and forms of ill treatment which are not physical)
- The impairment of, or an avoidable deterioration in, physical or mental health and/or
- The impairment of physical, intellectual, emotional, social or behavioural development.

5.2 Types of abuse

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint, female genital mutilation (FGM), or inappropriate physical sanctions.
- **Domestic abuse** – including psychological, physical, sexual, financial, emotional abuse, forced marriage and so called 'honour' based violence.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, indecent images, 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.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **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.
- **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.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – (previously known as institutional 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.

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **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.

Abuse can happen anywhere – for example:

- In the person's home.
- At a carer's home.
- Within day care, residential care, nursing care or other institutional settings.
- At work or in educational settings.
- In rented accommodation or commercial premises.
- In public places.

5.3 Who Can Abuse?

Anyone can carry out abuse or neglect, including:

- a partner/spouse;
- child;
- relative;
- friend;
- informal carer;
- a member of staff, volunteer or another worker;
- other adults at risk;
- a stranger.

6. CONCERNS AND DISCLOSURES

6.1 How to Deal with a Concern:

When there are concerns or where a disclosure or allegation is made people often feel anxious about passing on the information to anyone else. Concerned individuals may ask themselves, 'What if I'm wrong?' and this may hold them back from taking action.

It is important for staff to know that they are neither responsible for deciding whether abuse has occurred or not; nor are they responsible for conducting any investigations (this is the role of the DSO and appropriate authorities).

However, they do need to pass on any concerns they have through the Adult at risk Safeguarding procedures highlighted in this policy. It is crucial that staff members do not attempt to deal with the situation alone.

6.2 How Can You Be Alerted to Signs of Abuse or Neglect?

There are a variety of ways that you could be alerted that an adult at risk is suffering harm:

- An adult at risk may tell you.
- Someone else may tell you of their concerns or something that causes you concern.
- An adult at risk may show some signs of physical injury for which there does not appear to be a satisfactory or credible explanation.
- An adult at risk's demeanour or behaviour may lead you to suspect abuse or neglect.
- The behaviour of a person close to an adult at risk makes you feel uncomfortable (this may also include another member of staff, peer or family member). In this circumstance BFCCT staff, participants and partners are encouraged in 'whistle blow' to highlight concerns. In this instance, the BFCCT Whistleblowing Policy and Procedure would be followed.
- Another agency or organisation may raise concerns the abuse has taken place.

6.3 What if an Adult at risk Discloses Abuse?

In cases where an adult at risk discloses abuse to a staff member they should react appropriately, according to the following guidelines:

DO:

- Stay calm.
- Listen and hear.
- Express concern and empathy about what has happened.
- Reassure the person – tell the person that s/he did the right thing in telling you.
- Let the person know that the information will be taken seriously and give information about what will happen next.
- If urgent medical / police help is required, call the emergency services.
- Ensure the safety of the person.
- Use open questions to clarify required detail, see 6.4 (questions that cannot be answered yes or no)
- Record in writing the discussion and give it to the DSO at the earliest possible time.
- Act without delay.

DO NOT:

- Stop someone disclosing to you.

- Ask leading questions
- Promise to keep a secret.
- Press the person for more details or make them repeat the story.
- Gossip/pass on information about a disclosure to anyone without legitimate reason.
- Contact the alleged abuser.
- Attempt to investigate yourself.
- Leave details of your concerns on a voicemail or by email.
- Delay.

6.4 Checking Out

There may need to be some initial ‘checking out’ with the adult at risk who has disclosed information to you in order to ensure his / her safety, for example, if a staff member notices a bruise on an adult at risk’s arm, it would be appropriate to ask, ‘I see you have a bruise on your arm. How did that happen?’ However, be careful not to start investigating.

It is important to understand the clear distinction between ‘checking out’ and investigating.

Staff should not begin to investigate alleged or suspected abuse by asking questions that relate to the detail, or circumstances of the alleged abuse, beyond initial listening, expressing concern and checking out.

6.5 How to React and What to Do:

There is not one simple set of rules to follow in responding to these situations, but in general:

It is important that staff are aware that the first person who has concerns or encounters a case of alleged or suspected abused is not responsible for deciding whether abuse has occurred, (this is the role of the appropriate authorities).

However, staff, volunteers and others do have a duty of care to report any suspicions they may have regarding the abuse of an adult at risk to allow appropriate action to be taken.

Please ensure you contact Blackpool FC Community Trust’s DSL with any concerns:

Blackpool FC Community Trust (DSL) - 01253 348691/[MyConcern](#)

7. PROCEDURES FOR REPORTING AND RECORDING

Reporting and Recording:

The Adults at Risk Safeguarding Policy and report form can be found at <http://www.blackpoolfccommunitytrust.co.uk> or you can get a copy by contacting:

Blackpool FC Community Trust’s DSO – 01253 348691.

7.1 Basic Response Procedure / Action:

All concerns, disclosures, allegations and suspicions should be recorded using MyConcern (<https://www.myconcern.education/>). If MyConcern is not accessible then please use the Adults at Risk Safeguarding Report Form (See Appendix 1).

Where a staff member reports their concerns or a disclosure to a line manager, the line manager should advise them to report to the DSO immediately. **We recommend that 'if in doubt, report it'.**

There may be emergency situations where it is appropriate to contact social services, the police or seek medical attention immediately.

Whatever the circumstances of the concern, disclosure, allegation, or suspicion, it is vital that the staff member records the details at the earliest possible opportunity and then reports these details to their DSO as soon as possible.

Not every report results in a full investigation. Individual reports are accumulated to build a picture about a particular situation. It may be that a report submitted by a member of staff or volunteer may provide the necessary or decisive final piece of information.

7.2 Concerns about an adult at risk – Responding to allegations or concerns about a member of staff, volunteer or another third-party person:

The following procedures should be followed in each situation:

- Take the allegation or concern seriously. Always refer if you have a concern, do not investigate yourself, or do nothing.
- If it is an emergency contact 999 immediately.
- Report the concern on [MyConcern](#).

The DSL will then take appropriate action regarding the concern, contacting the relevant agencies to support.

7.3 Response to an Adult at risk making an allegation of abuse:

The following points are a guide to help to respond appropriately:

- Listen carefully to what the person is telling you.
- Find an appropriate early opportunity to explain that it is likely that what they are telling you will need to be shared with others.
- Ask questions for clarification only – never ask leading questions that suggest a particular answer.
- Reassure the person that they have done the right thing in telling you.
- Tell them what you will do next and with whom the information they have given will be shared with the DSL.

- Complete a report on [MyConcern](#) as soon as possible, giving all details that you are aware of and what was said using the adult at risk's own words. MyConcern will automatically inform the DSL.

7.4 Responding to disclosure of historical abuse

Allegations of child abuse are sometimes made by adults many years after the abuse has occurred. There are many reasons for an allegation not being made at the time including fear of reprisals, the degree of control exercised by the abuser, shame or fear that the allegation may not be believed. Other triggers may include the person becoming aware that the abuser is being investigated for a similar matter or their suspicions that the abuse is continuing against other adults at risk.

If this situation arises it is important to ascertain as a matter of urgency if the alleged perpetrator is still working with, or caring for adults at risk. Pass on the information to the Designated Safeguarding Officer who will contact Adult Social Care in the area where the alleged incident took place. The local Adult Social Care has case responsibility and should arrange a Strategy Discussion to determine any further action required. Even if the individual making the allegation is based in Blackpool, it is the Adult Social Care where the historical abuse took place that must be contacted.

Adult Social care should:

- Inform the Police and establish if there is any knowledge regarding the alleged perpetrator's current contact with adults at risk;
- Initiate a strategy discussion and consider other agencies;
- Make a LADO referral immediately if the adult works or works with adults at risk.

7.5 Complaints and Appeals

Where a response to a concern or allegation has been made and an outcome given is unsatisfactory and/or it is assumed that the response was not acceptable then a complaint or appeal maybe made.

Any complaints or appeals must be addressed by more senior staff and must follow the procedure set out in the BFCCT Complaints and Appeals policy.

8. PROGRAMMES REQUIRING EXTRA CONSIDERATIONS

8.1. Sporting Memories

Sporting Memories works with adults with mild cognitive impairment and diagnosed memory loss. Common symptoms of these conditions include memory loss, disorientation, confusion, difficulty communicating, behavioural changes, low mood, and overall cognitive impairment, all of which can put a person at risk of abuse or neglect.

Concerns about neglect are common as these conditions can hinder a person's ability to speak out or can make them confused about what is going on around them. Vulnerability to financial and material abuse may arise because they may stop understanding bills or finances and entrust them to an unsuitable third party.

Also, people with these conditions can be targeted by abusers because they may be unable to say no or are easily overwhelmed by domineering characters. Memory loss can erode a person's communication skills, rendering them unable to summon help or speak out. They often feel lonely and may be more inclined to accept abusive behaviours than spend time on their own.

Additionally, the person may forget about the abuse and never report it. As the condition takes hold and progresses, the person's self-protection mechanisms begin to fall away.

It is therefore important to embed the following into the delivery of the programme to support in safeguarding the individuals attending:

- Effective risk assessments in place
- Discussion with the individual and/or carer (dependent on capacity) to identify the level of understanding to be able to build a relationship and tailor communication
- Where there may be concerns for an individual it is important to consider:
 - The person may not understand what has happened to them
 - How you ask questions to find out information, consider being more generalised such as "How are things? Is everything ok?". Ask simple questions
 - Non-verbal communication can be of utmost importance (body language)
 - Look for the 'small wins', chipping away at the issues little by little.

8.2. DIVERT

DIVERT addresses a gap in the statutory provision for young adults (18-25 years), operating in Lancashire Constabulary (Blackpool) custody suites. DIVERT Custody Intervention Coaches explain the numerous paths that the individual can be referred to and follow this with a long-term development plan to assist them in fulfilling their own goals, relating to education, training and employment.

The DIVERT Policy Document outlines the safeguarding processes for programme.

8.3. Pool Together

POOL Together is a referral programme consisting of four elements which are: welfare calls; garden gate conversations; postal support, as well as signposting into our existing offline and online offer.

8.4. Community Navigation

Community navigation consists of staff working in the community to identify, signpost and engage adults and families to Blackpool FC Community Trust activities. Considerations for this programme must be given to:

- Lone working and procedure requirements including the [safe back form](#)

- Safety and welfare of individuals and families they engage
- Appropriate risk assessments in place to ensure staff and participant safety

9. CODES OF BEHAVIOUR

9.1. Staff and volunteers

Blackpool FC Community Trust staff, volunteers and others will encounter adult at risk in a range of situations and in a range of locations including the office, schools, leisure facilities and out in the local community, as well as in a range of other environments. How a member of staff should behave is outlined in the Staff Induction Policy and Employee Handbook.

The code of behaviour also applies to the workplace where members of staff, volunteers or work placement / experience staff may be vulnerable.

It is not practical within this policy to provide definitive guidance that will cover all situations, however the principles set out below should be applied in all situations:

- Staff should not spend excessive amounts of time alone with adult at risk away from others.
- Staff should not take an adult at risk to his / her own home.
- Staff should not take an adult at risk alone on car journey.

If it is unavoidable or necessary, these kinds of behaviours should only occur with the full knowledge and consent of a manager and where an appropriate record is maintained, further information on procedures can be found in the BFCCT Safer Working practice (Ethics) Policy.

Unacceptable behaviours are those that should always be avoided in the interests of the safety of adult at risk, staff and volunteers.

For example, staff / volunteers should never:

- Abuse, neglect, or harm / place at risk of harm adult at risk whether by omission or commission.
- Engage in rough physical games with adult at risk, including horseplay.
- Engage in sexually provocative games with adult at risk e.g. spin the bottle, strip poker etc.
- Make sexually suggestive comments to or about an adult at risk.
- Form inappropriate relationships with an adult at risk.
- Gossip about personal details of an adult at risk and their families.
- Make / accept loans or gifts of money from an adult at risk.
- Bully or belittle adult's at risk, BFFCT have a zero-tolerance approach to bullying (Anti-bullying Policy).

Staff who breach the above standards of behaviour will face disciplinary procedures.

9.2. Participants

Participants are encouraged to develop their own code of conduct to run alongside those set by staff at sessions.

BFCCT set standards in regards to:

- Behaviour
- Drugs and Alcohol
- Bullying – BFFCT have an anti-bullying policy that stipulates that BFFCT have a zero tolerance for bullying.

Disciplinary procedures are highlighted at the start of a new programme/session to ensure that participants know the consequence if their behaviour is not in line with the participant and BFCCT code of conduct (Appendix 6).

10. GUIDELINES FOR SHARING INFORMATION

Confidentiality and Information Sharing:

BFCCT have a [Data Protection policy](#) which provides guidance on the recording and storage of information.

Confidentiality must be maintained for all concerned however, records maybe disclosed in court as part of evidence in criminal action/case and to regulatory bodies if required.

Information will be handled and disseminated on a need to know basis only e.g. DSO, social services, police, The FA, EFLT, the adult at risk, courts and relevant staff.

Recorded information will be stored in a secure place in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

If enquiries arise from the public or any branch of the media, staff and volunteers must not make any comments regarding the situation and all queries are referred to the DSO.

Freedom of information requests regarding safeguarding reports will be dealt with by the DSO and Chief Executive on a case-by-case basis; however, it is likely that such requests will be refused due to the extremely confidential nature of the information sought.

If you would like further information or feel that you require additional training please contact **Blackpool FC Community Trust's DSO – 01253 348691.**

10.1 Use of images ([Consent Forms](#))

The Community Trust takes its guidance on the use of images from guidelines issued by the FA and EFL (Guidance for safer working practice – Safeguarding Vulnerable Groups). All images are taken by Community Trust staff who have been briefed by the media officer regarding their responsibility for the activity being photographed / filmed.

- Before taking images of adults at risk, consent is sought in writing at the start of each new session the adult at risk attends. Where necessary Parents/Legal Guardians/Carers are responsible for informing the Trust of any change in circumstances within the course of that adult at risk's attendance that may affect consent.
- Participants and where necessary Parents/Legal Guardians/Carers will be informed of how the image will be used. The Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All adult's at risk featured in Community Trust publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not the specific adult.
- Where appropriate, images represent the broad range of people participating safely in the session or event.
- Participants who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Trust document.
- No images of participants featured in Trust publications will be accompanied by personal details such as their home address etc.
- Any instances of inappropriate images should be reported to the DSO immediately.
- The media officer will ensure that the images used adhere to gaining consent and the Blackpool FC Community Trust Social Media Policy.
- If a participant is to be the focus of a case study, a case study consent form must be completed in line with the [Data Protection Policy](#).

10.2 Participant consent

All participants are required to complete a [consent form](#) prior to activity. In some cases, this can be done by a carer or guardian to ensure that the information gained is accurate.

11. REVIEWING OF THE POLICY

This policy will be reviewed every 12 months by DSO and amended regarding any legislation changes locally and nationally.

The policy will also be reviewed immediately following a serious incident whereby:

- An adult at risk is known or suspected to have been abused and
- Either the adult at risk has died or the adult at risk has been seriously harmed and there is a concern in how BFCCT responded to deal with the incident.

12. STAFF ACKNOWLEDGEMENT OF THIS POLICY

All staff must read this policy and be aware of and have knowledge of other key legislation. All policies are stored on MyConcern and Bright HR to readily accessible by staff. All staff must acknowledge they have read the policy by clicking read on MyConcern to record a read receipt.

13. USEFUL CONTACTS

Blackpool FC Community Trust

Telephone Number: 01253 348691

The English Football League / Trust

Tara Lawson – Email: tlawson@efltrust.com

The Football Association Safeguarding Team

Telephone Number: 0800 1691863

The FA CRC

Email: FAChecks@TheFA.com

Lancashire FA

Neil Yates

Telephone Number: 01772 624000

Blackpool LADO

Telephone Number: 01253 477541

Blackpool Police

Telephone Number: 01253 614444

Blackpool Council – Adult Social Care

Telephone Number: 01253 477592

Blackpool Council – Adult Mental Health Services

Telephone Number: 01253 951225

Anti-Bullying Alliance

Website: www.anti-bullyingalliance.org.uk

Charity Commission

Telephone Number: 0845 3000 218

Website: www.charity-commission.gov.uk

GLOSSARY

Adult at risk – is any person aged 18 or over who is, or may be, unable to take care of him or herself against significant harm or exploitation.

CRC – Criminal Records Check

DBS – Disclosure and Barring Service

DSO – Designated Safeguarding Officer

EFL – English Football League

EFLT – English Football League Trust

FA CRC – The Football Association Criminal Records Check

LADO – Local Authority Designated Officer

LFA – Lancashire Football Association

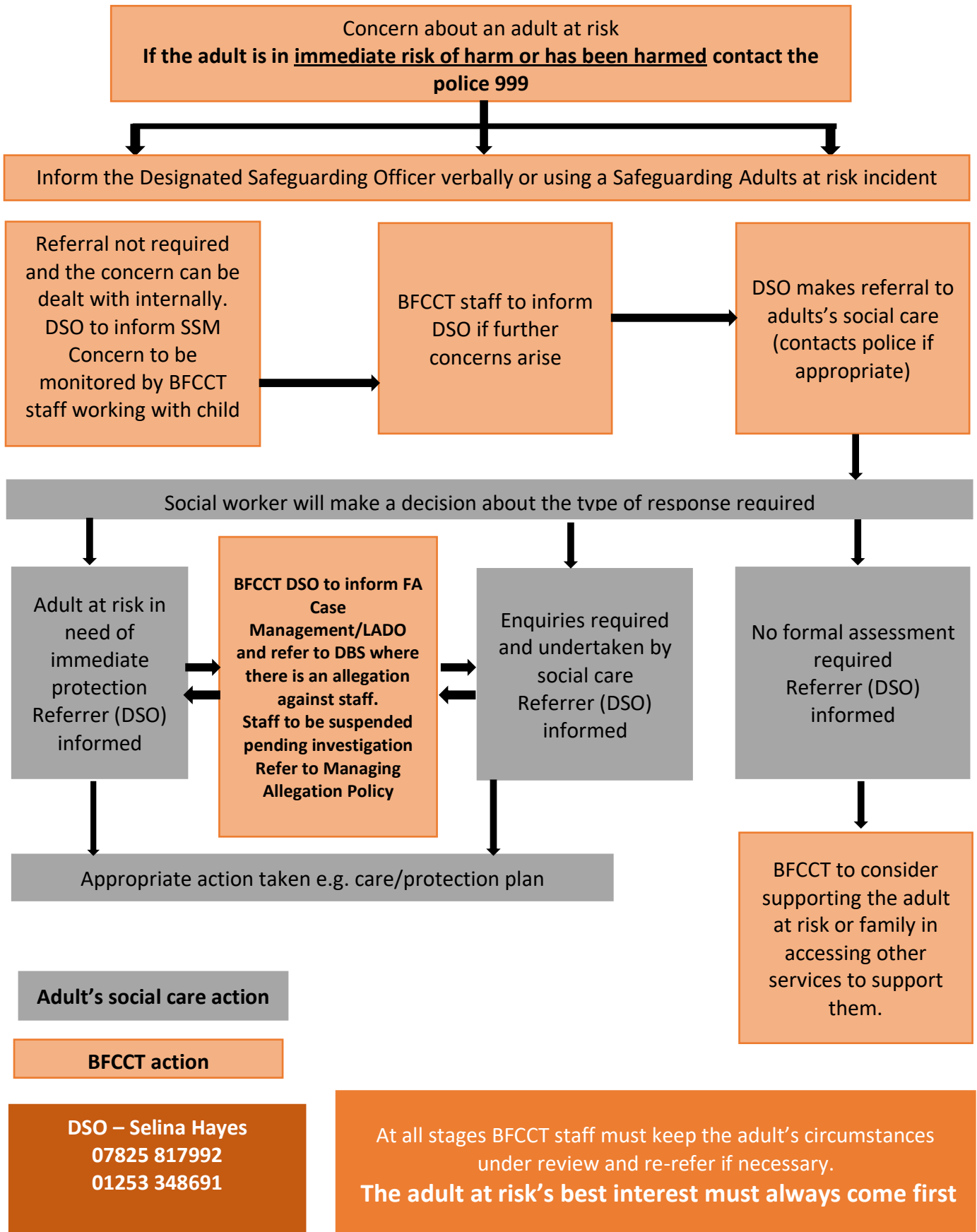
Staff – Staff and Volunteers

The FA – The Football Association

BFCCT – Blackpool FC Community Trust

APPENDICES

Actions where there are concerns about an Adult at Risk



Blackpool FC Community Trust Safeguarding Code of Conduct

'Safeguarding' can be defined as 'keeping children, young people and adults' at risk safe from harm'.

The Code of Conduct:

- Makes clear what is required to all staff (inclusive of volunteers)
- Supports staff in meeting their obligations;
- Enables staff to raise concerns without fear of blame;
- Reduces the risk of misplaced or malicious allegations by clarifying responsibilities.

Staff must abide by the following:

- Report any incidents or concerns that cause you to believe that a child, young person or adult at risk is, or is likely to be, at risk of harm including if you suspect that a child or adult at risk may be under the influence of radicalisation or extremism (Prevent).
- Refer to the BFCCT whistleblowing procedure if you feel an incident of concern cannot be reported to your manager or your managers manager.
- Disclose any criminal record, caution, reprimand or warning (subject to filtering) whether received prior to or during the course of your employment or volunteering.
- Inform your manager of anyone living in your household or at your address who becomes disqualified from working with children or adults at risk.
- Comply with BFCCT policies and procedures that support the development and well-being of children and adults at risk accessing our services.
- Promote positive behaviour through their actions during their duties.
- Ensure behaviour is managed effectively to provide a safe environment for participation.
- Model good behaviour for children, young people, and adults at risk to follow
- Treat all participants and staff fairly without prejudice or discrimination.

It is not acceptable (and in some instances, may be unlawful) for you to:

- Use your position to intimidate, bully, threaten, discriminate against, coerce, or undermine children, adults at risk or staff.
- Allow concerns or allegations to go unreported.
- Behave or communicate with children and adults at risk in ways which seek to build inappropriate relationships in order to abuse or put them at risk.
- Use a relationship with a service user or family member for personal gain. Any gift giving must be agreed with your manager.
- Give special rewards or privileges in an attempt to build appropriate relationships with children of adults at risk.
- Engage in, or attempt to engage in non-professional relationships with children and adults at risk for whatever reason e.g. suggestive comments, texts, emails and sexual relationships
- Carry out your role whilst affected by alcohol or drugs.
- Contact children and adults at risk for reasons that are not of a professional nature

Print name: _____

Signature: _____

Designated Safeguarding Officer Role Specification

Blackpool FC Community Trust is committed to safeguarding and promoting the welfare of children, young people and expects all staff and volunteers, parents, young players and any partner agency or commissioned service to share this commitment.

Post Title: Designated Safeguarding Officer

Department: Blackpool FC Community Trust

Responsible to: The Board / CEO / SSM

Responsible For: Safeguarding throughout BFCCT, ensuring staff adhere to safeguarding policy

The DSO's main duties include:

1. The first point of contact for all staff and volunteers to go to for advice if they are concerned about a child
2. Responsible for ensuring that their organisation's safeguarding policy is kept up to date and complete;
3. Ensure that they comply with safe recruitment procedures for new staff members and their induction.
4. Support staff to assist in information regarding concerns and support decision making about whether staff concerns are sufficient enough to notify Children's Social Work Services and other organisations.
5. Make formal referrals to the Duty and Advice Team; LADO; FA Case Management.
6. Ensure that concerns are logged and stored securely
7. Have joint responsibility with the SSM and Board of Trustees to ensure that the organisation's safeguarding policy and related policies and procedures are followed and regularly updated;
8. Responsible for promoting a safe environment for children and young people;
9. Know the contact details of relevant statutory agencies e.g. Children's Social Work Services (CSWS), Police, Local Safeguarding Children Board, and the Local Authority Designated Officer (LADO) for allegations against staff.
10. To identify training opportunities for staff and maintain a database of training including renewal dates for DBS.
11. To work with the EFLT Safeguarding Officer and FA Case Management Team in regards to safeguarding issues and concerns.

It is not the responsibility of the designated safeguarding officer to decide whether a child has been abused or not- that is the responsibility of investigative statutory agencies such as Children's Social Work Services or the police. However, keeping children safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child being harmed or at risk of being harmed.

Senior Safeguarding Manager Role Specification

Blackpool FC Community Trust is committed to safeguarding and promoting the welfare of children, young people and expects all staff and volunteers, parents, young players and any partner agency or commissioned service to share this commitment.

Post Title: Safeguarding Senior Manager (SSM)

Department: Blackpool FC Community Trust

Responsible to: The Board / The Chairman

Responsible For: Designated Safeguarding Officer(s) (DSO) - *in respect of safeguarding issues (not necessarily in respect of employment responsibilities).*

Overall Purpose of the Job

- The overall purpose of this role is to have senior management responsibility for the safeguarding of children and young people/adults at risk involved in any activities organised by the Club/CCO.
- Provide leadership at internal Safeguarding strategic meetings at least quarterly.
- Provide regular reports on Safeguarding to the Board.
- Have an up-to-date knowledge of relevant requirements for safeguarding children.
- Attend SSM Training delivered by EFL at least once every two years.
- Ensure the club has in place appropriate policies and procedures in respect of identifying and reporting concerns or disclosures related to the protection of children.
- Work together with, and support the club/department DSO (s) in respect of any concern, disclosure or investigation.
- Ensure complaints of poor practice or disclosures are dealt with or escalated to the appropriate investigating agency.
- Ensure the footballing authorities including EFL/EFL Trust and the FA Safeguarding Case Team are informed as appropriate.
- Ensure issues are reported to the Disclosure and Barring Service (DBS) as required by legislation.
- Ensure any records in relation child protection and safeguarding are stored safely in line with The Data Protection Act (1998).
- Together with the club/department/CCO DSO(s) identify safeguarding training needs and identify resources to support training is delivered to all staff and volunteers.
- Together with the DSO(s) monitor staff/volunteer training records in respect of safeguarding children.
- Together with the DSO(s) ensure all staff/volunteers working with children have the appropriate level of Disclosure & Barring Service (DBS) Criminal Records Check (CRC) for the role. That the CRC is regularly updated in line with FA and FL guidance, currently every 3 years.

Person Specification:

Guidance will be available, however, a high level of initiative, decision-making and discretion will need to be demonstrated in the performance of duties. Safeguarding Senior Managers should consider seeking external advice in relation to safeguarding as and when required.

Safeguarding Adults at Risk Policy pandemic Annex

Blackpool FC Community Trust is committed to safeguarding and promoting the welfare of adults. This commitment remains the same in the difficult circumstances brought about by a pandemic.

During this period the principles and practices of the Trust's Safeguarding Adults at Risk Policy and the Safeguarding Procedures (including the Code of Conduct) will continue to apply. To ensure the safety and welfare of adults whilst working in extraordinary circumstances, the Trust will adhere to the Government coronavirus guidance:

<https://www.gov.uk/coronavirus>

In practice, the following procedures will apply:

Designated Safeguarding Lead

There will always be a nominated DSL or deputy DSL available, either on site or contactable by phone or online video. Where a DSL or deputy is not on site a senior leader will take responsibility for safeguarding on site. The name and contact details of the 'duty' DSL will be published clearly to staff when the weekly duty rota is published.

Participants or anyone with a safeguarding concern should contact the lead staff member or DSL for that day.

Selina Hayes 01253 348691/07825 817992

Selina.hayes@bfcct.co.uk

Adults at Risk

The Trust will continue to work with and support social workers (adult social care) to help protect adults at risk. This will include liaising with relevant providers and ensuring that adults at risk and those on the edge of receiving social care support can attend our sessions where appropriate.

Participants and Staff

The Trust sessions and programmes will continue to be a safe place for adults at risk to attend. We will ensure that appropriate staff are on site to maximise safety, and refer to Government guidance on how to implement social distancing and to advice from Public Health England on handwashing and other measures to limit the spread of a virus. Participants on site will be registered and the Trust will follow up on any participant expected to attend. Where an adult does not take up their place at a session, or

discontinues, the Trust will notify their social worker. The Trust will also maintain a record of all staff/volunteers on site on any given day.

Online contact

The Trust will provide a safe environment for online communication. All participants and staff must remind themselves of and adhere strictly to the Acceptable Use Agreements and Online Safety Policy, including any pandemic extensions to these policies.

Reporting Concerns

We recognise that the Trust can be a protective factor for adults and young people, and that the current circumstances could affect the mental health of participants and their care givers. Staff will be in regular contact with participants and will continue to be vigilant for signs of safeguarding risk or emotional distress. Safeguarding concerns should be reported to the DSL as outlined above. Staff are reminded of the need to report any concern immediately and without delay. Concerns will be addressed initially by staff on site depending on the nature of the issue. All safeguarding concerns will be logged using a cause for concern form in the usual manner. Participants or care givers with a concern should contact the lead staff on site who will support and direct them to other staff as needed. Where a participant is already known to the Trust as being in need, the DSL will ensure that a communication and support plan is in place for that individual. This may include email, phone, or online video contact. The plan will be reviewed regularly and where concerns arise the DSL will consider any referrals as appropriate. Working in partnership we will continue to work closely with our local safeguarding partners and other local agencies.

Reporting procedures for individual programmes

Where programmes require further reporting of incidents and concerns please follow the guidance contained for that particular project in the main policy and Appendix 2.

