



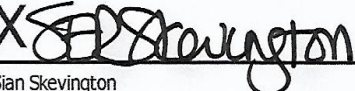


Safeguarding Adults Policy and Procedures

Ipswich Town Football Club and Ipswich Town Community Trust

Updated Version 4- December 2020

Review Date December 2021

Date of Last Review	Next Review	Who	Signature and Date
<u>Version 1-</u> June 2018	June 2019	Mark Andrews	X  _____ Mark Andrews Safeguarding Manager
<u>Version 2-</u> June 2019	June 2020	Lauren Fellingham	X  _____ Lauren Fellingham Safeguarding Officer
<u>Version 3-</u> June 2020	June 2021	Sian Skevington	X  _____ Sian Skevington Safeguarding Officer
<u>Version 4-</u> December 2020	December 2021		

IPSWICH TOWN SAFEGUARDING TEAM

Safeguarding Lead

Mark Andrews Mark.andrews@itfc.co.uk

Designated
Safeguarding Officers

Stuart Hayton 07894 401201

Stuart.hayton@itfc.co.uk

Sian Skevington (Academy) 07739 982 356

Sian.skevington@itfc.co.uk

Ralph Pruden (Academy) – 01473 662728

Ralph.pruden@itfc.co.uk

Denise Booth 01473 400595

Denise.booth@itfc.co.uk

Lauren Fellingham 01473 400584

lauren.fellingham@itfc.co.uk

Additional contacts:

Customer First

0808 800 4005 24 hours www.suffolkscb.org.uk/

Suffolk County Council LADO Local Authority Designated Officers:

Rennie Everett and Dian Campbell. - 0300 123 2044 for allegations against staff.

In emergencies only, please call 03456 066 167.

LADOCentral@suffolk.gcsx.gov.uk

FA helpline is available 24 hours a day 0800 023 264

EFL Safeguarding Manager- Alex Richards. 01772 325940 07792284749 arichards@efl.com

EFL Safeguarding Case Management Team (emergency only) 0800 0835 902.

Police- 101 or 999 in an emergency.

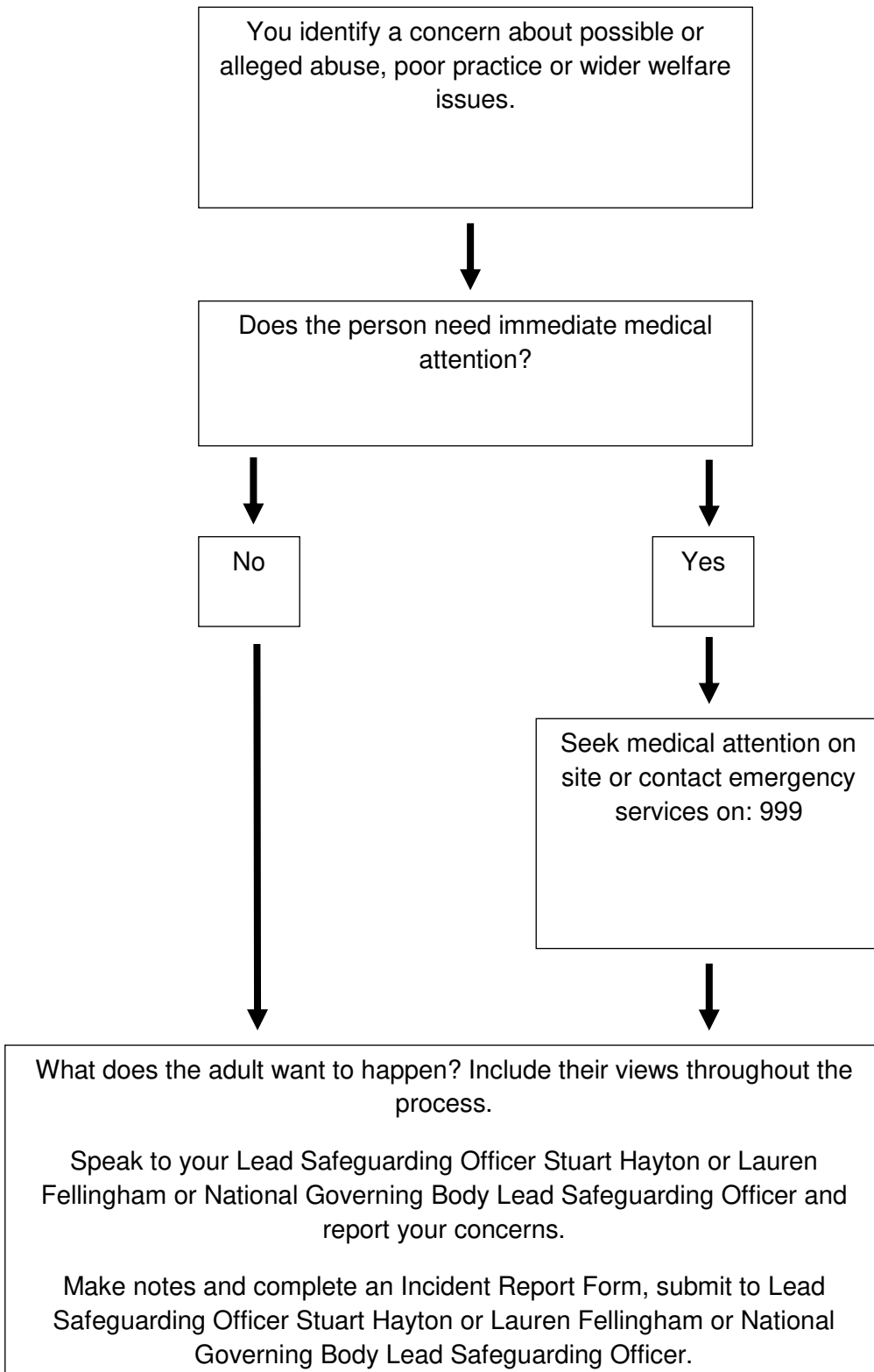
NSPCC Football Helpline- 0800 023 2642

Do you have concerns about an adult?

Safeguarding is everyone's responsibility.

If you have concerns about an adult's safety and or wellbeing you must act on these.

It is not your responsibility to decide whether or not an adult has been abused. It is however your responsibility to act on any concerns.



Ipswich Town Football Club Safeguarding Adults Policy and Procedures

Introduction

Ipswich Town Football Club and the Ipswich Town Community Trust is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in Football in accordance with the Care Act 2014.

Ipswich Town Football Club safeguarding adult's policy and procedures apply to all individuals involved in Ipswich Town Football Club and the Ipswich Town Community Trust.

Ipswich Town Football Club and the Ipswich Town Community Trust will encourage and support partner organisations, including clubs, counties, suppliers, and sponsors to adopt and demonstrate their commitment to the principles and practice of equality as set out in this safeguarding adult's policy and procedures.

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1. Principles

The guidance given in the policy and procedures is based on the following principles:

- All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- Ipswich Town Football Club and the Ipswich Town Community Trust will seek to ensure that our sport is inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.
- The rights, dignity and worth of all adults will always be respected.
- We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, in particular those adults with care and support needs
- We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within Ipswich Town Football Club or the Ipswich Town Community Trust for example inappropriate behaviour of a coach, or in the wider community.
- All allegations will be taken seriously and responded to quickly in line with Ipswich Town Football Club and Ipswich Town Community Trust Safeguarding Adults Policy and Procedures.
- Ipswich Town Football Club and the Ipswich Town Community Trust recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Boards.

2. Definitions

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

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; and;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

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. See section 4 for further explanations.

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). (See Appendix 2)

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 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.”

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 Ipswich Town Football Club fully.

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect

- Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains
- Suitability of the individual's living accommodation
- The individual's contribution to society.

3. Legislation

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:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 1998
- Making Safeguarding Personal 2014

4. Types of Abuse and Neglect

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.

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

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

Trafficking- The United Nations (UN) defines Trafficking in people as: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in persons' even if this does not involve any of the means as set out above.

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. Coercive or controlling behaviour does not relate to a single incident, it is a purposeful pattern of incidents that occur over time in order for one individual to exert power, control or coercion over another. For example, restricting access to money, restricting movements, isolating the victim from family and friends, intercepting messages or phone calls.

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 – Stealing from an adult at risk, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned, this is a significant area of risk.

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.

5. Signs and indicators of abuse and neglect

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

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions. 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 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.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.
- Harassing of a club member because they are or are perceived to have protected characteristics.
- Not meeting the needs of the participant. E.g. this could be training without a necessary break.
- A coach intentionally striking an athlete.
- This could be a fellow athlete who sends unwanted sexually explicit text messages to a learning disabled adult they are training alongside.
- This could be an athlete threatening another athlete with physical harm and persistently blaming them for poor performance.

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

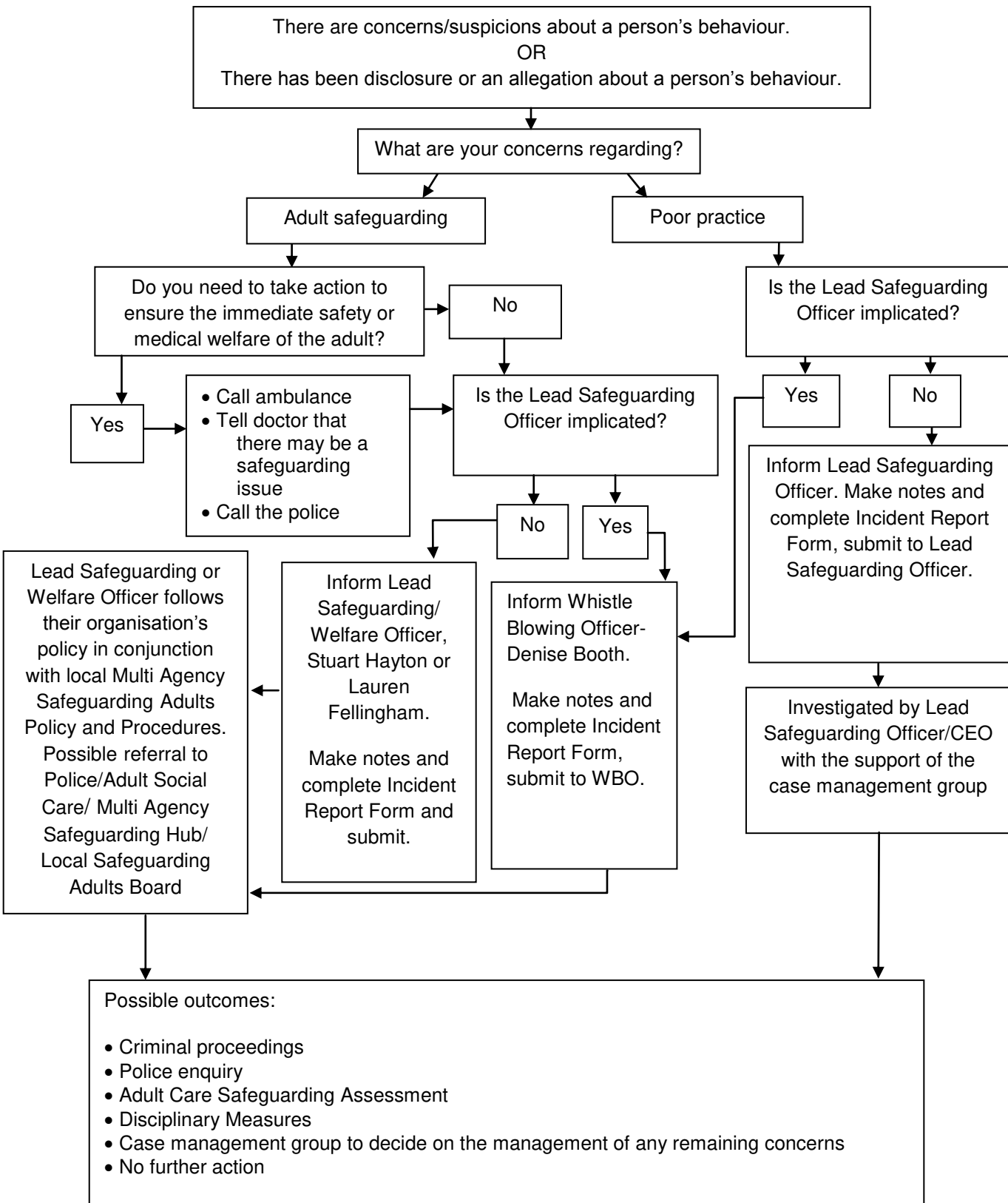
- It is not your responsibility to decide whether or not an adult has been abused. It is however everyone's responsibility to respond to and report concerns.
- If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the Ipswich Town Football Club Lead Safeguarding Officer, Stuart Hayton or Lauren Fellingham, or, if the Lead Safeguarding or Welfare Officer is implicated then report to the Ipswich Town Football Club Whistle blowing Officer Denise Booth..
- When raising your concern with the Club Welfare Officer or Lead Safeguarding Officer, remember Making Safeguarding Personal. It is good practice to seek the adult's views on what they would like to happen next and to inform the adult you will be passing on your concern and
- It is important when considering your concern that you also ensure that keep the person informed about any decisions and action taken about them and always consider their needs and wishes.

7. How to respond to a concern

- Make a note of your concerns.
- Make a note of what the person has said using his or her own words as soon as practicable. Complete a ITFC Safeguarding Adults Incident Form and submit to the Ipswich Town Football Club Lead Safeguarding Officer, Stuart Hayton or Lauren Fellingham.
- Remember to make safeguarding personal. Discuss your safeguarding concerns with the adult, obtain their view of what they would like to happen, but inform them it's your duty to pass on your concerns to your lead safeguarding or welfare officer.
- Describe the circumstances in which the disclosure came about.
- Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- Be mindful of the need to be confidential at all times, this information must only be shared with your Lead Safeguarding or Welfare Officer and others on a need to know basis.
- If the matter is urgent and relates to the immediate safety of an adult at risk then contact the emergency services immediately.

8. Safeguarding Adults Flowchart

Dealing with Concerns, Suspicions or Disclosure



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

9. Roles and responsibilities of those within Ipswich Town Football Club

- Ipswich Town Football Club and the Ipswich Town Community Trust is committed to having the following in place:
- A Lead Safeguarding Officer to produce and disseminate guidance and resources to support the policy and procedures.
- A clear line of accountability within the organisation for work on promoting the welfare of all adults.
- Procedures for dealing with allegations of abuse or poor practice against members of staff and volunteers.
- A Disciplinary Panel will be formed as required for a given incident, if appropriate and should a threshold be met.
- Arrangements to work effectively with other organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Appropriate whistle blowing procedures and an open and inclusive culture that enables safeguarding and equality and diversity issues to be addressed.
- Clear codes of conduct are in place for coaches, participants, officials, spectators and other relevant individuals.

10. Good practice, poor practice and abuse

Introduction

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

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

Good practice

Ipswich Town Football Club expects that that coaches of adult athletes:

- Have completed a course in basic awareness in working with and safeguarding Adults.

Everyone should:

- Aim to make the experience of Ipswich Town Football Club and the Ipswich Town Community Trust fun and enjoyable.
- Promote fairness and playing by the rules.
- Not tolerate the use of prohibited or illegal substances.
- Treat all adults equally and preserve their dignity; this includes giving more and less talented members of a group similar attention, time and respect.

Safer Working Practice for EFL Members

Good Practice guidelines

All personnel are encouraged to demonstrate exemplary behaviour to best safeguard children but also to protect themselves from allegations.

The following are common sense examples of how to create a positive culture and climate within Ipswich Town.

Good practice means:

- All staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Treating all adults equally, and with respect and dignity.
- Putting the welfare of each adult first and act in their best interest.
- Building balanced relationships based on mutual trust and maintain professional boundaries at all times.
- Give enthusiastic and constructive feedback rather than negative criticism. Making football fun, enjoyable and promoting fair play.
- Being an excellent role model - this includes not smoking, drinking excessive amounts of alcohol, using drugs or using bad language in the company of adults.
- Have access to and be familiar with the Club's Code of Conduct (Refer to Rules of the Road Handbook) and Safeguarding policies and procedures (Refer to ITFC Safeguarding Children Policy).
- Know who the Safeguarding Manager is and how to contact them.
- Ensure any concerns or allegations pertaining to a adult's safety and welfare are recorded and acted upon, in line with the club's safeguarding policies and procedures.
- Promote an environment where poor practice is challenged and reported.
- Help maintain an ethos whereby colleagues, adults and their carers feel able to articulate any concerns, safe in the knowledge that effective action will be taken as appropriate.
- Ensure there is always an appropriate staff to participant ratio, determined by:

1. Age and needs of the participants.
2. Nature of the activity and environment.
3. Risk assessments identifying potential behavioural or other issues.
4. Expertise and experience of the staff involved.
5. Male and female supervising staff wherever possible for mixed gender participant activities.

Relationship of Trust & Communication

When an individual accepts a role at Ipswich Town or the Ipswich Town Community Trust that involves working or volunteering with children or adults at risk, he/she must understand and acknowledge the responsibilities and trust inherent in the role. A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work and the nature of the activity.

Staff must **not**:

- Use their position to gain access to information relating to adults for their own advantage.
- Use their power to intimidate, threaten, coerce or undermine adults at risk.
- Use their status and standing to form or promote inappropriate relationships, professional boundaries must be maintained at all times.
- Contact adults at risk known through football outside of the football context on social networking sites and ask for personal information.
- Use internet or web based communications to send personal messages of a non-football nature to a adult at risk.
- Engage in any personal communications, 'banter' or comments.

(For further guidance refer to the club's Safeguarding Social Media Policy)

Staff **must**:

- Only contact adults at risk for professional reasons and with the knowledge and agreement of Ipswich Town or the Ipswich Town Community Trust.
- Be an excellent role model – this includes not smoking, not using bad language, not using drugs or being under the influence of alcohol in the company of adults at risk..

Staff and Volunteer Behaviour

Staff and Volunteers at Ipswich Town and the Ipswich Town Community Trust have a responsibility to maintain confidence in their suitability to work with children and adults at risk. Behaviour and actions that would lead

any reasonable person to question motivation, intentions and suitability to work with these groups must be avoided.

Staff must:

- Familiarise themselves with their club's safeguarding and related policies and procedures and know who their Safeguarding Manager and Designated Safeguarding Officers are and how to contact them.
- Be vigilant and ensure all adults and carers act in accordance with the standards set by Ipswich Town and the Ipswich Town Community Trust. Staff are also responsible for those who enter changing rooms etc.
- Treat adults at risk equally with dignity and fairness and build balanced relationships based on mutual trust.
- Encourage and demonstrate consistently high standards of behaviour and understand the types of behaviour that may call into question their suitability to work with children and/or adults at risk.
- Be aware that behaviour outside of work time may impact upon their suitability to work with children and/or adults at risk.
- Be aware that breaches of the law, the Club's safeguarding policies and this guidance may result in criminal and/or disciplinary action being taken against them. (See ITFC Disciplinary Action Policy).

Staff must never:

- Use their position to gain access to information relating to children and/or adults at risk for their own or others' advantage. Such information should only be used or shared to protect children and/or adults at risk and to meet their needs.
- Carry out their duties whilst under the influence of alcohol, solvents or drugs.
- Engage in any sexual, betting, gambling or related activities or have discussions about such activities in the presence of children and/or adults at risk except in a clear educational context and with the knowledge and agreement of Ipswich Town and the Ipswich Town Community Trust.
- Use Ipswich Town or Ipswich Town Community Trust equipment to access pornography on personal devices when on duty.
- Access, make or distribute illegal or indecent content or images of children/adults at risk

Creating a Safe Environment

Ipswich Town Football Club and the Ipswich Town Community Trust take into consideration the health, safety and welfare of all children during the planning, delivery and review of all activities.

Staff must:

- Identify the health, safety and safeguarding risks when conducting any event/ activity with adults at risk.
- Know emergency response procedures covering injury, illness, emergency evacuation, missing persons, local services and emergency contacts including emergency consular assistance details when abroad and ensure there is adequate insurance cover in place.
- Secure parental/carer consent in writing for participation, use of images/footage and to act in loco parentis, if the need arises to give permission for the administration of emergency first aid and/or other medical treatment.
- Be subject to DBS checks at the highest level.
- Keep a written record of any injury or accident that occurs, along with the details of any treatment given and/or action taken. Advise parents of the incident.

Home visits

There are circumstances and occasions in which a member of staff's responsibilities may include home visits. Wherever possible such visits should not be undertaken alone. Contact by whatever means and meetings with vulnerable groups outside work arrangements should not take place without the agreement of the club, and in the case of a adult at risk, they should not take place without a parent/carer being present. A Safeguarding Officer should be consulted in all instances.

Photography and Digital Imagery

Ipswich Town and the Ipswich Town Community Trust utilises designated photographers to record activities and events within the club. Written parental/carers consent must be obtained before any adult at risk partaking in Ipswich Town and the Ipswich Town Community Trust events and activities are photographed, filmed or their image is captured using any device.

The exception to this, when written parental consent will not apply, is when the adult at risk enters solely as a spectator at Portman Road (including all locations owned, occupied or utilised by the club), at which time the terms and conditions of entry advise that by a parent/carer allowing their adult at risk to enter the ground they thereby provide consent for that adult at risk's image to be captured/used by the club. This is in line with existing club and EFL Ground Regulations 24 and 26.

Staff should not take unauthorised images or video footage of adults at risk. In addition, staff should never use or distribute images of adults at risk without their knowledge and parental consent and without the permission of Ipswich Town Football Club or the Ipswich Town Community Trust.

(For more information please refer to ITFC Photography and Digital Imagery Policy and ITFC Academy Images Policy)

Rewards and Gifts

Staff should exercise care when selecting children and/or adults at risk for Activities, privileges or rewards to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and consistently applied. Care should also be taken to ensure that Staff do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

At Ipswich Town and the Ipswich Town Community Trust, staff may at your discretion accept genuine gifts given as a token of appreciation to a value not exceeding £50. You may not accept any gift (whatever the value) offered by any third party in consideration of favours given or in the expectation of favours to be given in the course of your employment. Further, you must immediately notify your Manager of all gifts or offers of gifts whether or not considered by you to be improperly motivated. It is a disciplinary offence to fail to notify your Manager of any such gift or offer. If you are offered a gift exceeding £50 in value which you consider to be a genuine expression of appreciation you should disclose the offer in accordance with the above requirements and seek the Club's and Trust's consent to you accepting the gift. You will be personally responsible for any tax liability that may arise on the gift. (Information found in the ITFC Rules of Road Staff Handbook)

First Aid and Administration of Medication

When administering emergency first aid, Staff should ensure that another adult is aware of the action being taken wherever possible. At Ipswich Town Football Club, a qualified First Aider should be found to administer any first aid. Staff should understand the extent and limitations of their role and should recognise when an injury requires more experienced intervention.

Safeguarding within Partnerships

Ipswich Town recognises its responsibility to safeguard the welfare of all Children and Adults at Risk participating in club activities and when participating in activities arranged in partnership with an external service provider. The club is committed to working within partnerships to provide a safe environment for all Children and Adults at Risk by utilising

Safeguarding Policies and Procedures to protect vulnerable groups from physical, sexual or emotional harm, neglect, bullying or exploitation.

The club commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to Children or Adults at Risk of Harm. (For more information see ITFC Safeguarding within Partnerships Policy)

Confidentiality

Ipswich Town and the Ipswich Town Community Trust will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of young people. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not however make promises on confidentiality they may be unable to keep.

Furthermore, staff should always make any complainant fully aware of any situation where confidentiality must not be maintained. Where there is a concern that the adult may be suffering, or is at risk of suffering, abuse or significant harm, the adult at risk's safety and welfare must be the overriding consideration.

Adults at risk may disclose information verbally and non-verbally which is difficult for the member of staff to deal with without further advice/support, or which must be reported to statutory agencies. In this case the complainant should be told that the situation will be discussed with the Safeguarding Manager or Designated Safeguarding Officer with a speciality in that area, but confidentiality will be maintained if possible.

Information sharing

Ipswich Town and the Ipswich Town Community Trust is committed to sharing information for the purposes of safeguarding and promoting the welfare of adults at risk in line with Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005, Making Safeguarding Personal Guide 2014 and The care Act 2014- Statutory Guidance). Every effort though should be made to ensure that confidentiality is maintained for all concerned.

Information must be shared on a need to know basis, with or without the consent of the adult at risk to whom the information relates or the consent of that child's parent, carer or guardian. Whilst it is good practice to obtain consent wherever possible, it is not a prerequisite. Information may be shared with (but is not limited to) the following people:

- The Safeguarding Manager/Safeguarding Officers.
- The parents of the person who is alleged to have been abused.
- The person making the allegation.
- Social Services/Police.
- The Managing Director/Communications Manager.
- The alleged abuser (and parents if the alleged abuser is a child)

In the event of a Criminal Investigation the Safeguarding Manager, Designated Safeguarding Officer (or member of staff dealing in their absence) will seek Social Services/Police advice on who should first approach the alleged abuser.

Information should be stored in a secure place with limited access to designated people, in line with data protection laws, e.g. that information is accurate, regularly updated, relevant and secure. Information will be retained for the relevant period as specified in the club's Data Retention Policy.(For more information see the Marcus Evans Telecom Policy)

11. Relevant Policies

This policy should be read in conjunction with the following policies:

- Safeguarding Policy- Protection of Vulnerable Adults 2015
- Safeguarding Adults in Sport 2017 Sport England
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Mental Capacity Act 2005
- Deprivation of Liberty Safeguards 2009
- The Care Act 2014- Statutory Guidance
- Making Safeguarding Personal Guide 2014
- ITFC Safeguarding Children Policy
- ITFC Whistle Blowing Policy
- ITFC Social media Policy
- ITFC Complaints Policy
- ITFC Disciplinary Policy
- ITFC Equality, Diversity and Respect Policy

12. Further Information

Policies, procedures and supporting information are available on the Ipswich Town Football Club website: www.itfc.co.uk.

Designated Safeguarding Officers:

-

Stuart Hayton stuart.hayton@itfc.co.uk 07894401201

Denise Booth densie.booth@itfc.co.uk 01473 400595

Sian Skevington (Academy) sian.skevintgon@itfc.co.uk 07739 982 356

Matchday- Lauren Fellingham lauren.fellingham@itfc.co.uk 07786582958

Review date

This policy will be reviewed every year or sooner in the event of legislative changes or revised policies and best practice.

Appendix 1

Incident Report Form

Safeguarding Adults Incident form

To be completed as fully as possible if you have concerns regarding an adult. It is important to inform the adult about your concerns and that you have a duty to pass the information onto the safeguarding officer. The safeguarding officer will then look at the information and start to plan a course of action, in conjunction with yourself, the adult involved and if necessary social care or other relevant organisations.

Section 1 – details of adult at risk	
Name of adult	
Address	
Date of Birth	
Age if date of birth not known	
GP practice (if known)	
Contact number	
Section 2 – your details	
Name	
Contact phone number(s)	
Email address	
Line manager or alternative contact	
Name of organisation/club	
Your Role in organisation	
Section 3 – details of Concern	
Detail what you have seen/been told/other that makes you believe the adult at risk is being abused or is at risk of abuse (include dates/times/evidence from records/photos etc.)	

Section 4 - Abuse type(s) – please tick as many as you feel may apply		
Physical	Psychological	Financial
Sexual	Discriminatory	Organisational (formerly institutional)
Neglect	Hate incident/crime	Mate Crime
Internet abuse	Modern slavery	Female genital Mutilation (FGM)
Forced Marriage	Domestic abuse	Radicalisation
Self-Neglect		
Section 5 - Have you discussed your concerns with the adult? What are their views, what outcomes have they stated they want (if any)?		
Section 5A – Reasons for not discussing with the adult		
Adult lacks capacity		
Adult unable to communicate their views		
Discussion would increase the risk		
State why the risks would increase		
Section 5B - Have you discussed your concerns with anyone else? E.g. carer/parent. What are their views?		

Section 6 – What action have you taken /agreed with the adult to reduce the risks?	
Information passed to Safeguarding Officer, confirm details:	Referral to Social Care Confirm details:
Contact with the police Confirm details:	Referral to other agency – please confirm details:
Other – please state what	
No action agreed – state why	
Section 7 – Risk to others	
Are any other adults at risk Yes/No – delete as appropriate	
If yes state why and what actions have been taken to address these?	
Are any children at risk Yes/No Delete as appropriate	
If yes state why and what actions have been taken to address these?	
Signed:	
Date:	

OFFICE USE ONLY
Section 8 – sharing the concerns (To be completed by Lead Safeguarding Officer)
Details of your contact with the adult at risk. Have they consented to information being shared outside of Ipswich Town Football Club?
Details of contact with the Social Care Team where the adult at risk lives – advice can be still sought without giving personal details if you do not have consent for a referral
Details of any other agencies contacted
Details of the outcome of this concern

Appendix 2

Guidance and information

Making Safeguarding Personal

There has been a cultural shift towards Making Safeguarding Personal within the safeguarding process. This is a move from prioritising outcomes demanded by bureaucratic systems. The safeguarding process used to involve gathering a detailed account of what happened and determining who did what to whom. Now the outcomes are defined by the person at the centre of the safeguarding process.

The safeguarding process places a stronger emphasis on achieving satisfactory outcomes that take into account the individual choices and requirements of everyone involved. “What good is it making someone safer if it merely makes them miserable?” – Lord Justice Mundy, “What Price Dignity?” (2010)

What this means in practice is that adults should be more involved in the safeguarding process. Their views, wishes, feelings and beliefs must be taken into account when decisions are made.

The Care Act 2014 builds on the concept, stating that “We all have different preferences, histories, circumstances and lifestyles so it is unhelpful to prescribe a process that must be followed whenever a concern is raised.”

However, the Act is also clear that there are key issues that should be taken into account when abuse or neglect are suspected, and that there should be clear guidelines regarding this.

<https://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/making-safeguarding-personal>

Capacity – Guidance on Making Decisions

The issue of capacity or decision making is a key one in safeguarding adults. It is useful for organisations to have an overview of the concept of capacity.

We make many decisions every day, often without realising. We make so many decisions that it's easy to take this ability for granted.

But some people are only able to make some decisions, and a small number of people cannot make any decisions. Being unable to make a decision is called "lacking capacity".

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 like learning disability, dementia, mental health needs, acquired brain injury, and physical ill health.

The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides the framework for this to happen.

The MCA is about making sure that people over the age of 16 have the support they need to make as many decisions as possible.

The MCA also protects people who need family, friends, or paid support staff to make decisions for them because they lack capacity to make specific decisions.

Our ability to make decisions can change over the course of a day.

Here are some examples that demonstrate how the timing of a question can affect the response:

- 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 at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

In each of these examples, it may appear as though the person cannot make a decision. But later in the day, presented with the same decision, they may be able to at least be involved. The MCA recognises that capacity is decision-specific, so no one will be labelled as entirely lacking capacity. The MCA also recognises that decisions can be about big life-changing events, such as where to live, but equally about small events, such as what to wear on a cold day.

To help you to understand the MCA, consider the following five points:

1. Assume that people are able to make decisions, unless it is shown that they are not. If you have concerns about a person's level of understanding, you should check this with them, and if applicable, with the people supporting them.
2. Give people as much support as they need to make decisions. You may be involved in this – you might need to think about the way you communicate or provide information, and you may be asked your opinion.
3. People have the right to make unwise decisions. The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.

4. If someone is not able to make a decision, then the person helping them must only make decisions in their “best interests”. This means that the decision must be what is best for the person, not for anyone else. If someone was making a decision on your behalf, you would want it to reflect the decision you would make if you were able to.
5. Find the least restrictive way of doing what needs to be done.

Remember:

- You should not discriminate or make assumptions about someone’s ability to make decisions, and you should not pre-empt a best-interest’s decision merely on the basis of a person’s age, appearance, condition, or behaviour.
- When it comes to decision-making, you could be involved in a minor way, or asked to provide more detail. The way you provide information might influence a person’s ultimate decision. A person may be receiving support that is not in-line with the MCA, so you must be prepared to address this.

Consent and Information Sharing

Workers and volunteers within sports and physical activity organisations should always share safeguarding concerns in line with their organisation's policy, usually with their safeguarding lead or welfare officer in the first instance, except in emergency situations. As long as it does not increase the risk to the individual, the worker or volunteer should explain to them that it is their duty to share their concern with their safeguarding lead or welfare officer.

The safeguarding lead or welfare officer will then consider the situation and plan the actions that need to be taken, in conjunction with the adult at risk and in line with the organisation's policy and procedures and local safeguarding adults board policy and procedures.

To make an adult safeguarding referral you need to call the local safeguarding adults team. This may be part of a MASH (Multi-Agency Safeguarding Hub). A conversation can be had with the safeguarding adults team without disclosing the identity of the person in the first instance. If it is thought that a referral needs to be made to the safeguarding adults team, consent should be sought where possible from the adult at risk.

Individuals may not give their consent to the sharing of safeguarding information with the safeguarding adult's team for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view on whether it is best to share information.

If they still do not consent, then their wishes should usually be respected. However, there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people or a serious crime has been committed. This should always be discussed with your safeguarding lead and the local authority safeguarding adults team.

If someone does not want you to share information outside of the organisation or you do not have consent to share the information, ask yourself the following questions:

- Is the adult placing themselves at further risk of harm?
- Is someone else likely to get hurt?
- Has a criminal offence occurred? This includes: theft or burglary of items, physical abuse, sexual abuse, forced to give extra money for lessons (financial abuse) or harassment.
- Is there suspicion that a crime has occurred?

If the answer to any of the questions above is 'yes' - then you can share without consent and need to share the information.

When sharing information there are seven Golden Rules that should always be followed.

1. Seek advice if in any doubt
2. Be transparent - The Data Protection Act (DPA) is not a barrier to sharing information but to ensure that personal information is shared appropriately; except in circumstances where by doing so places the person at significant risk of harm.
3. Consider the public interest - Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
4. Share with consent where appropriate - Where possible, respond to the wishes of those who do not consent to share confidential information. You may still share information without consent, if this is in the public interest.
5. Keep a record - Record your decision and reasons to share or not share information.

6. Accurate, necessary, proportionate, relevant and secure - Ensure all information shared is accurate, up-to-date; necessary and share with only those who need to have it.
7. Remember the purpose of the Data Protection Act (DPA) is to ensure personal information is shared appropriately, except in circumstances where by doing so may place the person or others at significant harm.

Appendix 3

Legislation and Government Initiatives

Sexual Offences Act 2003

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

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

Mental Capacity Act 2005

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

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

Safeguarding Vulnerable Groups Act 2006

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

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

Deprivation of Liberty Safeguards

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

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

Disclosure & Barring Service 2013

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Criminal record checks: guidance for employers - How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS). www.gov.uk/db-update-service

The Care Act 2014 – statutory guidance

<http://www.legislation.gov.uk/ukpga/2014/23/introduction/enacted>

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

Making Safeguarding Personal Guide 2014

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

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

Appendix 4

Useful contacts

Local Authority Safeguarding Lead (if policy is used by a CSP or club)

Name: Rennie Everett/ Dian Campbell
Email: LADOCentral@suffolk.gcsx.gov.uk
Telephone: 0300 123 2044

Ann Craft Trust - Safeguarding Adults in Sport and Activity:

Website: www.anncrafttrust.org
Email: Ann-Craft-Trust@nottingham.ac.uk
Telephone: 0115 951 5400