



Swansea City AFC Foundation Safeguarding Adults at Risk Policy

Background and Need for a Policy

Swansea City AFC Foundation is committed to creating opportunities for adults with disabilities and mental health problems to participate in a broad spectrum of activities with the Foundation at the same time as creating a safer culture for the participants.

The participation of adults at risk may be as players, coaches, employees, volunteers, officials, administrators or spectators.

The Foundation has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities.

The Foundation has a commitment to manage and monitor allegations of discrimination, harassment, abuse and bullying,

Safer Structures

The Safeguarding Adults at Risk Policy is there to react to the occasions where proactive and preventative work has failed and where harm has occurred by acts of commission or omission and where the Adult at Risk has not been able to safeguard his or herself. In particular, its function is to ensure that safeguards are put in place to keep the Adults at Risk safe and to prevent such harm occurring again, either to the same Adults at Risk or to other Adults at Risk.

Relationship to Swansea City AFC Foundation's Safeguarding Children Policy

There is no 'Adults at Risk' Act to provide clear legislative guidance. The definition of 'Adult at Risk' is always open to interpretation and individuals may be at risk at some times and not others. All adults have a right to self-determination. They may not wish to have others intervene to safeguard them. Adults may consent to sexual activities and the issue of consent may affect the reporting and management of allegations. Local authorities are organised differently to receive and manage referrals. There is not a uniform approach by the various Local Safeguarding Boards.

A definition of the term "Adult at Risk"

Someone who is aged 18 or over:

- Who is unable to protect him or herself against significant harm or exploitation
- who is or may be in need of community care services by reason of mental or other disability, increasing frailty or illness, alcohol or drug dependency

Or

- Who is or may be unable to take care of him or herself (includes alcohol or drug dependency)

Overview

Swansea City AFC Foundation is committed to football being inclusive and providing a safe and positive experience for everyone involved in the Foundation.



Whilst it is hoped that the proactive preventative work, including training, vetting and providing clear policies are sufficient to safeguard all adults at Swansea City AFC Foundation, the Foundation recognises that it has a responsibility to safeguard Adults at Risk from abuse and harm and to respond where abuse and harm are perceived to have occurred.

The responsibility taken by this Policy is to:

- Safeguard the welfare of Adults at Risk at Swansea City AFC Foundation by protecting them from any significant physical, sexual and emotional harm and from neglect, bullying and financial harm within the Foundation. This may include training and codes of practice amongst other strategies for reducing risk.
- Report to the appropriate authorities any concerns about abuse or harm to Adults at Risk whether this occurs within the Foundation or elsewhere and whether this be a potential criminal offence or other concern. The appropriate authorities may be internal and external to football. This will include following the Foundation's reporting frameworks.
- Ensure appropriate investigations and responses to concerns about abuse or harm within Swansea City AFC Foundation utilising the disciplinary process as appropriate. This will include work in partnership with the Police and other statutory agencies charged with investigating and responding and with the Adult at Risk who is believed to be at risk or believed to have been harmed.
- Following such investigations, act to put appropriate safeguards in place to safeguard the Adult at Risk in the future and to reduce the risk of harm to other Adults at Risk with the Foundation
- Report when appropriate to the Independent Safeguarding Authority (ISA) anybody delivering a regulated activity for Swansea City AFC Foundation who is believed by the Foundation to present a risk of harm to Adults at Risk. Where the Foundation "withdraws permission" for a person to deliver a regulated activity they will also be reported to the ISA.
- The Foundation has the power as part of its Disciplinary procedures to issue a suspension, pending a risk assessment where any one or more of the following applies:-
 1. The individual fails to comply with any part of DBS and ISA Processes;
 2. The individual has been barred by the ISA from engaging in regulated activity relating to Adults at Risk;
 3. The individual has been convicted of, or made the subject of caution for, a serious sexual, violent offence or any other offence that Swansea City AFC Foundation believes to be relevant to the care of Adults at Risk;
 4. Following a risk assessment, the Foundation is satisfied on the balance of probabilities that the individual poses or may pose a risk of harm to Adults at Risk.



N.B In addition to the DBS/ISA vetting process, applicants will be required to provide at least two references that attest to their suitability to be involved in football involving Adults at Risk. The spouse, cohabitee, civil partner or a family member of the person subject to this requirement cannot act as a referee for this purpose. One of the referees should be the applicant's most recent or current employer.

ABUSE

Abusive behaviour can be assessed on a scale from poor practice, to bad practice to abuse. Abuse cannot be easily measured as an action alone. Its severity will partly be defined by the:

- vulnerability of the victim and the power differential
- nature and extent of the abuse
- length of time it has been occurring
- impact on the individual or group
- risk of it being repeated or becoming increasingly serious

There are different **types of abuse** and these include:

- Physical Abuse – Including hitting, slapping, pushing, kicking, and misuse of medications, restraint or inappropriate sanctions. This includes domestic abuse and violence, controlling, coercive or threatening behaviour, so called honour based violence and forced marriage.
- Sexual Abuse – Including rape and sexual assault or sexual acts to which the person has not consented, or could not consent and /or was pressured into consenting.
- Psychological Abuse – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation or withdrawal from supportive networks.
- Financial/Material Abuse – Including theft, fraud, and exploitation – wills, property, inheritance, possessions or benefits.
- Neglect and acts of omission – Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g. medication, adequate nutrition and heating.
- Self- Neglect - Where an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding and attending to medical conditions that they have.
- Discriminatory Abuse and Hate Crime – Including racist, sexist abuse based on a person's disability (No Secrets, DH 2000).
- Organisational Abuse – Involves the collective failure of an organisation to provide safe, appropriate and acceptable standards of service to adults at risk.
- Bullying – Physical, verbal or emotional. Either by individuals or systemically.
- Cyber/internet bullying – Any form of bullying which takes place on line or through a mobile phone.
- Modern day slavery and trafficking – Can include persons being forced to work against their will/criminal and sexual exploitation and domestic servitude.



- Extremism and radicalisation – Holding or adopting of extreme political or religious views.

At one end of a scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be very difficult to detect. Combinations of factors which individually might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

Where may harm occur?

Harm may occur anywhere in a Swansea City AFC Foundation activity or it can be reported to a Foundation representative (or indicative signs noticed) when it has occurred outside a Foundation activity. There are complex scenarios including:

Adults at Risk playing, officiating, coaching, spectating or administering within a variety of activities at Swansea City AFC Foundation Adults at Risk may be at risk of harm from other adults who may or may not be at risk themselves. Those doing harm to the Adult at Risk may be involved in the Foundation activity or elsewhere in the Adult at Risk's network. Harm may be deliberate or result from not understanding the Adult at Risk's needs (i.e. be by commission or omission).

Adults at Risk may be at risk of harming others in Swansea City AFC Foundation activities either by deliberate behaviours or by failing to understand their responsibilities to others. On these occasions the Adult at Risk may need help and support to manage his or her behaviour in a suitable way, or, may need to have certain responsibilities removed from them. Safeguards may need to be put in place to protect others.

Adults who have been 'at risk' in the past who are now 'not at risk', (example: people recovering from mental health issues). Where these adults are seeking positions of responsibility at Swansea City AFC Foundation but have criminal records or issues from their past which are directly related to these periods of being at risk, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling. Whilst the Foundation promotes a policy of inclusion, the risk assessments are conducted to measure the risk posed by somebody who is recovering from a previous period of being at risk, considering other Adults at Risk and children who need safeguarding from possible harm, should the risk factors re-emerge.

Adults at Risk may also be at risk of harming themselves through failing to realise and report when they need additional or different support in **Swansea City AFC Foundation** activities.

SWANSEA CITY AFC FOUNDATION STAFF AND UNPAID WORKERS' RESPONSIBILITIES

Creating the atmosphere for someone to tell you what is wrong

The coordinator of each activity involving Adults at Risk at the Foundation will ensure that the participants know how to get help, how they can report abuse, who to report it to and what response they can expect.



Some people who have been abused appear able to speak to someone about it and wish action to be taken. Others seem to be very reluctant to talk about the experience. There may be several reasons for this:

- It may just be too painful emotionally to talk about what happened. Feelings of shame and embarrassment often inhibit people reporting concerns
- There may not be an opportunity to see someone who is trusted, privately
- There may be anxiety about repercussions from the perpetrator or others if the abuse is reported
- There may be a worry about “where it will all end”, for example if the police are told, or perhaps a fear of going to court
- The abused person may just be prepared to put up with it
- Communication and language may be an inhibitor
- The person may not recognise an experience to be abusive if their previous life experiences have been confusing

People with mental health problems are under-represented in Safeguarding referrals. In addition to the concerns listed above, inhibitors could include:

- Not being believed
- Effects of stigma
- Powerlessness, lack of choice, power differences
- Fear of a continuing oppressive regime
- The perceived victim could have confused feelings towards the abuser

It is very important, if abuse is suspected, to try and create the opportunity for the person to disclose what is happening. It is crucial to give participants the confidence to know that they will be listened to. In some situations, the worst thing to do might be to keep asking if everything is alright. In others, a few encouraging prompts might be just what the person was waiting for. The following might help to create the right atmosphere:

- Identifying a named person responsible for safeguarding for each team or activity who is a familiar face to the participants. This measure is intended to be empowering for the service-users.
- Where abuse is suspected, identify the member of staff the person appears to like or trust the most. Create an opportunity for the person to share their concern with an identified staff member.
- Where there is factual evidence available, it may be useful to let the person know it has been observed so that the person does not feel they are telling about something that is a complete surprise
- Because the person might be worried about losing control of the situation if they tell, it might be helpful to give assurances that after disclosing abuse, the person is always asked what they wish to do about it. Respect will be given to their wishes, but there are various circumstances where it will be necessary to report a concern against a person’s wishes, particularly when others would be left at risk. Do not guarantee that you will keep to yourself what they want to tell you.

Key points to remember about disclosure

- Many incidents of abuse or crimes only come to light because the abused person themselves tells someone



- You must be aware that the person may not appreciate the significance of what they are sharing. They may not realise or accept they are being abused
- Disclosure may take place many years after the actual event or when the person has left the setting in which they were afraid
- Even if there is a delay between the actual event and the disclosure – you should demonstrate to the person that you believe them unless it is absolutely clear and provable that the events they are describing could not have happened

Managing the disclosure/observation - Do's and Don'ts

If someone discloses abuse to you:

- Stay calm and try not to show shock
- Listen carefully rather than question directly
- Be sympathetic and offer reassurance
- Be aware of the possibility that medical evidence might be needed
- Tell the person that:
 - They did right to tell you
 - You are treating this information seriously
 - It was not their fault
 - You must inform the Safeguarding Manager, Graham Smith, or appropriate Safeguarding Officer by recording details of the disclosure on the Foundation's MyConcern software.
- Usually after consulting the Adult at Risk, Safeguarding Manager or the Safeguarding Officer will contact the Safeguarding Adults at Risk team
- The Safeguarding Manager or Safeguarding Officer will contact the Safeguarding Adults at Risk team without the adult's consent in certain circumstances but the adult's wishes will be made clear throughout
- If a referral is made and they are reluctant to have the incidents investigated this fact will be recorded and brought to the attention of the Safeguarding Manager at Swansea City AFC Foundation
- If appropriate, the Foundation will take steps to protect and support the adult

Alerting/Reporting

- Do not wait until you have all the information
- If the person is injured or not yet safe, take immediate action to help them e.g., dialing 999 for police or ambulance
- Tell the person what you are going to do about the concern
- If the Safeguarding Manager or identified Safeguarding Officer for an activity is not available, inform another one
- Only tell the people who need to know
- Follow up your verbal report with a written account on MyConcern as soon as possible

Establishing the victim's wishes

It is very important that you do not investigate the concerns, but the following guidance should be followed.

- Where there is no emergency, there is an opportunity to check out the adult's wishes in relation to the concern
- There is a need to establish who the victim would most like to talk to about the matter
- Liaise with the Safeguarding Manager or a Safeguarding Officer



- The member of staff chosen must familiarise themselves with all possible options and prior to the interview, seek advice regarding the potential consequences of each option for the victim
- It is important to remember the interview is only about establishing what the victim wishes to do about the incident, not about discussing the incident itself.
- Important to allow the victim time to consider the options and if there is uncertainty, offer to meet again

Preserving the evidence

Your first concern is the safety and welfare of the abused person. However, your efforts to preserve evidence may be vital.

In all cases, but especially when police involvement is required, preservation of evidence is crucial if the police investigation is to be effective. What you do or do not do in the time whilst you are waiting for the police to arrive may make all the difference.

The following checklist aims to help you to ensure that vital evidence is not destroyed:

In situations of physical and/or sexual assault

- In the case of a person who has been physically abused who wishes to show you an injury, only observe what they consent to show you and what is appropriate
- Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum. Place the items/weapons in a clean dry place until the police collect them
- Preserve anything that was used to comfort the abused person, for example a blanket
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused person and/or the alleged perpetrator, until the police arrive
- The Police may organise a medical examination urgently

Prior to the arrival of the police and medical examination:

- Ensure that no one has physical contact with both the abused person and the alleged perpetrator as cross-contamination can destroy evidence. It is acknowledged that if you are working alone in the situation, you may have to comfort both the abused person and the alleged perpetrator e.g. where the alleged perpetrator is also a **Swansea City AFC Foundation** service-user. You need to be aware that cross-contamination can easily occur
- Preserve any bloodied items
- Encourage victim not to shower
- Encourage victim not to change clothing
- Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later
- Encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth

Methods of Preservation



- For most things use clean brown paper, if available, or a clean brown paper bag or a clean envelope. If you use an envelope, do not lick it to seal. Avoid using plastic bags as they can produce moisture
- For liquids use clean glassware
- Do not handle items unless necessary to move and make safe. If latex gloves are available, use them.
- It is acknowledged that completion of all of the above tasks may not be possible in a traumatic situation. You are urged to do the best that you can.

Ensuring the individual is in or is moved to a place of safety

It is essential that, whatever the nature of the suspected abuse, the Adult at Risk is separated from the person who is or is thought to be producing the threat. It is important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. However, if it is not achievable, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority

How to get help urgently

Emergency services should be summoned whenever a situation is felt to be beyond the control of members of staff. In addition, staff should have, readily available, all the contact numbers of the Safeguarding MANAGER, colleagues, Safeguarding Officers or other services which can assist in an emergency or urgent situation.

Role of staff supporting the alleged victim

Members of staff involved in supporting the alleged victim have a key role in making sure the procedures are followed and that the victim is properly advised and supported. If a number of staff are involved, it may be convenient for one person to take the lead. This is entirely a matter for the staff and Safeguarding Manager or Safeguarding Officer to decide in the light of the individual circumstances.

The role of the staff supporting the alleged victim includes the following:

- Ensuring the continued safety of and support to the abused person
- Liaising with immediate colleagues who have been involved in order to gather all the available information together
- Ensuring that evidence has been preserved
- Collating and completing all written material relating to the incident
- Reporting the matter to the Safeguarding Officer at the earliest opportunity

IT IS NOT PART OF THE ROLE OF THE STAFF SUPPORTING THE VICTIM TO COMMENCE AN INVESTIGATION INTO THE INCIDENT

ROLE OF THE SAFEGUARDING MANAGER

For the purpose of the management of a safeguarding adults situation, the Safeguarding Manager should be consulted. In the absence of the SAFEGUARDING MANAGER or Deputy Safeguarding Manager, or if s/he is implicated in the abuse, an alternative Safeguarding Officer must always be identified to deal with the matter. The role of the Safeguarding Officer comprises the following:

- Directly managing and supporting the staff involved in the situation



- Ensuring that action taken is effective in providing immediate and ongoing protection to the Adult at Risk
- Ensuring that practical and emotional support is available according to need
- Reporting the incident to the Safeguarding Manager or Safeguarding Adults at Risk Team in which the incident occurred
- In the absence of the Safeguarding Manager, communicating with the Safeguarding Adults at Risk Team to ensure the procedure is correctly followed
- Where an allegation is made against a member of staff or a volunteer Swansea City AFC Foundation the Safeguarding Manager will liaise with the HR team to invoke the Suspension procedures.
- The HR team will take responsibility for ensuring that the appropriate support is offered to the person who is suspended

Preventing Extremism and Radicalisation in Adults at Risk and Vulnerable Groups

Extremism is the holding of extreme political or religious views, for an ideology that is considered to be far outside the mainstream attitudes of society.

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. For example, Radicalisation can originate from a broad social consensus against progressive changes in society. Radicalisation can be both violent and nonviolent. There are multiple pathways that constitute the process of Radicalisation which can be independent but are usually mutually reinforcing.

From July 2015 care providers are subject to a duty under the 'Counter Terrorism and Security Act 2015 in the exercise of their functions, to have 'Due Regard' to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent Duty.

The guidance and advice provided is intended to help child care providers think about what they can do to protect children from risk of Radicalisation.

This is seen as a child care providers wider safeguarding duties and similar in nature to protecting children from other forms of harm (e.g. drugs, gangs, neglect, sexual exploitation) Whilst the above is aimed at children and young people it is clear that other vulnerable groups are equally at risk of being radicalised.

'Prevent' is part of the governments Counter-Terrorism Strategy. The overall principle is to safeguard vulnerable individuals and stop people becoming terrorists or supporting terrorism.

'Channel' is part of the Prevent Strategy. This is a multi-agency approach to identifying and providing support to individuals who are at risk of being drawn into terrorism.



FOUNDATION

SCFC Safeguarding Manager
Rebeca Storer
Tel: 01792 616419
Email: rebecastorer@swanseacity.com

Swansea City AFC Foundation Safeguarding Manager
Graham Smith
Tel: 07469 158112
Email: graham@swansfoundation.org.uk

Signed on behalf of the trustees

Name: Jonathan Wilsher

Sign: *Jonathan Wilsher*

Date: 13/10/2021

Name: Rebecca Edwards-Symmons

Sign: *Rebecca Edwards-Symmons*

Date: 13/10/2021