



Bristol City Community Trust

Safeguarding Adults at Risk Policy

Reviewed: January 2019



#MakingBristolProud

Contents –

Contents	Page 1
Policy Statement	Page 2-3
Related Policies	Page 3
Roles and Responsibilities	Page 5-6
Definitions	Page 7-8
Further Guidance on Safeguarding Issues	Page 8
- Female Genital Mutilation	Page 8
- Forced Marriage	Page 8
- Honour Based Violence	Page 8-9
- Raising awareness of potential vulnerability	Page 9
- Vulnerable adults with disabilities	Page 9
- Vulnerable adults from minority ethnic groups	Page 9
- Supporting lesbian, gay, bisexual and transgender vulnerable adults	Page 10
- Dealing with bullying	Page 11
- Bullying as a result of any form of discrimination	Page 11
- Cyberbullying	Page 12
- Radicalisation	Page 12
- Peer on Peer Abuse	Page 13
- Social media	Page 13
- Photography and use of Images	Page 13
Safer Recruitment of volunteers and staff	Page 13-14
Managing Risk	Page 14
Legislative Framework & Working with Other Agencies	Page 16
Reporting	Page 16
Allegations made against staff	Page 17-18
Contacts	Page 18-19
Policy Review Points	Page 19
Reporting Paperwork	Page 21-23

Aim of this policy

Bristol City Community Trust continues to be committed to ensuring all necessary steps are taken to protect from harm children, young people and vulnerable adults who participate in sport and education activities.

This document sets out The Trust's position, role and responsibilities, and clarifies what is expected of our staff when working with vulnerable adults.

Everyone involved in sport and education needs to understand the individual and collective responsibility they undertake when working vulnerable adults. It's clear that working together and giving people a voice makes a difference when it comes to having effective safeguards in sport & education.

This policy applies to all Bristol City Community Trust staff, volunteers and trustees whether paid or unpaid. These staff members could be;

- Administration staff
- Community coaching staff
- Education staff
- Volunteers
- Bus drivers
- Higher education students
- Ambassadors
- Trust partners
- Trustees
- Football club representatives

It's essential that everyone is clear about how to report a concern about the welfare of a vulnerable adult. In short this means following the guidelines set out in this policy. Further support and guidance can be obtained through the designated safeguarding officer (DSO) or senior safeguarding manager (SSM).

This framework is based on The EFL's and FA's safeguarding policy as well as Bristol City FC. The Trust works with a number of partner organisations who form a safeguarding forum to ensure the safeguarding framework is implemented effectively across club and community organisations in the wider Bristol Sport Group. This includes representatives from Bristol Sport, Ashton Gate, Bristol City FC, Bristol Bears, Bristol Flyers, Bristol Bears Community Foundation, Bristol Flyers Community, and Bristol Sport Foundation.

We have taken on board the thoughts and feelings of the participants that we are working with to shape the safeguarding policy to ensure it is inclusive. We have done this by holding participant voice meetings to discuss safeguarding and what could be improved from a Trust point of view. This has enabled the policy to be adapted to suit the current climate and the participants that we work with.

We will follow the procedures set out by the Bristol Safeguarding Adults Board (BSAB) and take account of guidance issued by the DFE and the Local Authority.

All action is taken in line with the following legislation/guidance:

- Education regulations
- Equality Act 2010
- Data Protection Act (1998)
- Education Act 2002
- Counter Terrorism and Security Act 2015
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (POFA) (2012)
- South Gloucestershire guidance on Forced Marriage, Female Genital Mutilation and Honour Based Violence

- Female Genital Mutilation Act (2013)
- Sexual Offences Act (2003)
- The Care Act (2014)
- The Equality Act (2010)
- The Mental Capacity Act (2010)
- National PREVENT strategy with guidance and advice regarding radicalisation
- Information sharing - advice for practitioners providing safeguarding services parents and carers 2015

More guidance on local policy/legislation and guidance can be found here on the Bristol Safeguarding Adults Board website <https://bristolsafeguarding.org/adults/>

This relates to the following policies;

- Achieving best evidence
- Death in Childhood
- Document types
- Domestic Abuse
- Escalation of professional disagreements
- Female Genital Mutilation
- Forced Marriage
- Inherent jurisdiction
- Injuries in non-mobile babies
- Information sharing
- Joint Integrated Supervision Good Practice Guide and Tools
- Joint Perinatal Mental Health
- Learning and improvement framework
- Managing strategies
- MAPPA
- Multi Agency Professional Meetings
- Neglect
- Partnership agreements and written undertakings
- Prevent
- Safer Recruitment
- Single Assessment Framework
- Substance Misuse
- Threshold Guidance
- Trafficking and Modern Slavery

Definitions

Definition of a Vulnerable Adult

The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2000

In these Regulations 'vulnerable adult' means a person aged 18 or over who is receiving services of a type listed in paragraph (2) below and in consequence of a condition of a type listed in paragraph (3) below has a disability of a type listed in paragraph (4) below.

The services are:

- a) Accommodation and nursing or personal care in a care home
- b) Personal care or nursing or support to live independently in his/her own home
- c) Any services provided by an independent hospital, independent clinic, independent medical agency or NHS body;
- d) Social care services
- e) Any services provided in an establishment catering for a person with learning difficulties

The conditions are:

- a) A learning or physical disability;
- b) A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- c) A reduction in physical or mental capacity

The disabilities are:

- a) A dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
- b) Severe impairment in the ability to communicate with others;
- c) Impairment in a person's ability to protect him/herself from assault, abuse or neglect

Law Commission, 'Making Decisions' Lord Chancellors Dept 1999

A 'Vulnerable Adult' is defined as someone over 16 who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation'

Safeguarding Vulnerable adults

Every vulnerable adult who plays or participates in sport and education should be able to take part in an enjoyable and safe environment and be protected from abuse and exploitation. This is the responsibility of everyone involved.

The Trust recognises its responsibility to safeguard the welfare of vulnerable adults who play or participate in activities and projects by protecting them from abuse and exploitation. This means creating a safe and inclusive atmosphere where everyone at the Trust works together to tackle both bullying and discrimination, ensure safer recruitment, and tackle poor practice which leads to harm and reduces equal opportunities. Best practice in inclusion, anti-bullying, equality and the respect agenda are all part of making safer cultures and prevention of harm and abuse.

The Trust is committed to working to provide a safe environment for all vulnerable adults to participate in the sporting projects to the best of their abilities for as long as they choose to do so. All staff and volunteers must ensure a positive commitment towards equality and diversity by treating others fairly and not committing any form of direct or indirect discrimination, victimisation or harassment of any description and to promote positive working relationships between all internal and external stakeholders.

The Trust's Safeguarding Vulnerable Adults Policy principles are that:

- The vulnerable adult's welfare is, and must always be, the paramount consideration
- All vulnerable adults have a right to be protected from abuse regardless of their age, gender, gender reassignment, sexual orientation, marital status or civil partnership, racial origin, faith, ability or disability, pregnancy and maternity
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Working in partnership with other organisations, vulnerable adults and carers is essential
- The Trust is committed to working in partnership with the Police, LADO, (BSAB) Bristol Safeguarding Adults Board and the Disclosure and Barring Service (DBS) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all participants.
- The Trust's Safeguarding Policy is in response to government legislation and guidance, developed to safeguard the welfare of vulnerable adults. We have appointed a Designated Safeguarding Officer in line with FA and EFL recommendations.
- The safeguarding policy is further supported by The FA's Respect programme to address verbal abuse and bullying of youngsters by parents and coaches on the side-lines.

There are other specific safeguarding issues as detailed on page 12 of the 'Keeping children safe in education' E.g. Peer on peer abuse, domestic abuse, female genital mutilation, honour based violence, sexting, preventing radicalisation and issues arising from social media/internet use. These and other issues are described below.

For further information on the policies written by Bristol Safeguarding Adults Board please visit <https://bristolsafeguarding.org/adults/professionals/policies/>

Related Policies

- Whistleblowing
- Anti-bullying

- Complaints & Appeals
- Trips & Tours
- Information Sharing Policy
- Staff & Volunteer Code of Conduct
- Student Code of Conduct

Roles & Responsibilities

Designated Safeguarding Officer (DSO)

The Trust will always have a designated Safeguarding Officer with the responsibility for safeguarding; this person will be a member of the Trust's Senior Management Team.

The Designated Safeguarding Lead will:

- Ensure that there are mechanisms in place to assist the staff to understand and discharge their roles and responsibilities as set out in "Keeping Children Safe in Education" (2016).
- Ensure all staff have received Prevent training.
- Ensure that proper procedures and policies are in place and are followed with regard to safeguarding and protection issues.
- Ensure all staff and volunteers receive appropriate training as part of their induction and annually thereafter.
- Ensure that they receive necessary training related to the role and have updated training every 2 years and in addition, keep up-to-date with safeguarding developments at least annually.
- Ensure that records of training are accurately maintained for all staff in liaison with the trust administration department.
- Ensure that the profile of safeguarding remains high within the Trust by communicating regular updates.
- Ensure all staff and volunteers have access to protocol and policy related to safeguarding.
- Ensure that parents/carers are aware that the Trust may need to make referrals as this will avoid later conflict if the Trust does have to take appropriate action to safeguard a vulnerable adult
- Be responsible for record keeping, ensuring accuracy and security.
- Act as a source of advice, support and expertise within the Trust and will be available for other staff, volunteers and Trustees to draw upon.
- Coordinate all action regarding safeguarding concerns.
- Liaise with the Safeguarding Senior Manager to inform them of any issues and ongoing investigations.
- Support Trustees with reviewing this policy annually.

The Safeguarding Senior Manager (SSM)

The Trust will always nominate a Trustee as the Safeguarding Senior Manager with the responsibility for safeguarding at the Trustee level.

The Safeguarding Senior Manager will:

- Ensure that they utilise the experiences and expertise of the staff when shaping the safeguarding policies.
- In liaison with the DSO, will ensure that the Trust has a safeguarding and vulnerable adult's policies and procedures in place and that these are known to all members of the Trust board.
- Ensure Trustees attend appropriate safeguarding training.
- Where safeguarding concerns about a member of staff are substantiated appropriate action is taken.
- Delegate responsibly for day to day procedures that ensure the smooth operational practice for safeguarding arrangements to the DSO.
- Ensure that policy and practice aligns with guidance set out in Keeping Children Safe in Education.

HR/Personnel Lead

The HR/Personnel Lead for the Trust will:

- Ensure Staff and Volunteers are carefully selected, screened, trained and supervised.
- All Trustees have an enhanced DBS in place.
- All volunteers have read “Keeping Children Safe in Education”
- All adults with substantial access to vulnerable adults at the Trust have an Enhanced Disclosure and barring Service check before starting work and prior to confirmation of employment. Take steps to gather sufficient and accurate information about whether any member of staff is disqualified by association.
- Ensure the Trust’s single central record is accurate maintained as an ongoing, accurate and live record.
- Ensure that new staff have access to information on identifying and reporting abuse, and confidentiality issues. Receive basic safeguarding vulnerable adult’s information and a copy of this policy.
- Ensure any new staff have an understanding of the Trust’s Code of conduct and whistleblowing policy.

All Staff

The Trust has a duty to ensure that professional behaviour applies to relationships between staff and young people and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

Staff should be explicitly aware of the dangers inherent in:

- Working alone with vulnerable adults
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from participants and parents
- Contacting adults through private telephones (Including text), email or social networking sites.
- Disclosing personal details inappropriately
- Vulnerable adults outside of Trust hours.

If a member of staff has reasonable suspicion that an adult is suffering harm, and fails to act in accordance with this policy and Bristol Safeguarding Adults Board procedures this will be viewed as misconduct and appropriate action will be taken by the Safeguarding Senior Manager.

Any member of staff or visitor to the Trust who receives a disclosure of abuse or suspects that abuse may have occurred must report it immediately to the DSO or the SSM. Confidentiality must be maintained and information relating to the individual shared with staff on a strictly need to know basis.

All members of staff have a duty to attend training on safeguarding vulnerable adults that will enable them to fulfil their responsibilities effectively.

Abuse

The Trust recognises that the terms ‘vulnerable adult’, ‘abuse’ and ‘exploitation’ are open to interpretation, so for the purposes of this policy, these are defined as follows;

A vulnerable adult is described as; ‘a person aged 18 years or over, who is in receipt of or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm’.

Abuse shall be defined as: ‘a violation of an individual’s human or civil rights by any other person or persons and, for the purposes of safeguarding vulnerable adults, shall include physical abuse, emotional abuse, sexual abuse, neglect and bullying.’

Categories of abuse:

Physical Abuse: This is any abuse where a vulnerable adult is physically harmed, for example hitting, biting, and burning. Signs and symptoms might be unexplained wounds, bruises or broken bones. The individual might make up stories to explain injuries or try to cover them up with clothing

Emotional Abuse: This means a vulnerable adult's emotional needs are not being met. This could include being made to feel inadequate or not feeling loved and secure. A parent or carer may not be talking to them enough or giving them the attention they need. Typical signs and symptoms could include delays in development, speech disorders or a fear of making mistakes or overreacting to them.

Sexual Abuse: This could involve a vulnerable adult being involved in sexual acts, being made to watch sexual acts or being shown pornography. Typical signs and symptoms include awareness and knowledge of sexual activities beyond what would be expected at their age as well as genital or anal pain or itching or sexually transmitted diseases (STDs)

Neglect: This is a form of abuse where a vulnerable adult's basic needs are not met, for example through a lack of food, medical attention or access to education or poor clothing, housing, hygiene or parenting. Neglect could sometimes be happening as a result of a vulnerable adult being the carer of a family member. Typical signs and symptoms may include always being hungry, poor personal hygiene, delays in development, tiredness and looking ill and underweight.

Exploitation shall be defined as: Taking advantage of someone's vulnerability to treat them badly for the abuser's benefit.

Further Guidance on Safeguarding Issues

The Trust's commitment to ensuring that football is for everyone means that as more people from all communities and faiths get involved in the game, there is an increased possibility that instances of female genital mutilation, forced marriage or honour based violence may be reported or advice sought.

Female Genital Mutilation (FGM)

Female genital mutilation is a form of abuse common to some African, Asian and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and often without anaesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information and support to anyone concerned that a vulnerable adult's welfare is at risk because of female genital mutilation. Though callers' details can remain anonymous, any information that could protect the, from abuse will be passed to the Police.

The Trust should be mindful if a regular attender goes missing from a club or if a vulnerable adult, their peer or relative starts expressing worries about a trip abroad.

If you are worried that someone may be at risk of FGM, you can contact the 24 hour helpline anonymously on 0800 028 3550 or email fgmhelp@nspcc.org.uk.

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link – www.nspcc.org.uk/Inform/resourcesforprofessionals/minorityethnic/female-genitalmutilation_wda96841.html

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic abuse and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. Of the 1,300 plus cases dealt with in 2012 40% of victims were under 18.

If you are worried that a vulnerable adult may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email fmufco.gov.uk. For more information on forced marriages go to www.gov.uk/forced-marriage

Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women and men.

The Association of Chief Police Officers defines HBV as: "A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community".

HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a vulnerable adult abuse concern and a crime. If you are worried that a vulnerable adult may be at risk of HBV contact BSAB for further advice and guidance or speak with the Designated Safeguarding Officer.

Raising awareness of potential vulnerability

Some vulnerable adults may experience multiple challenges and difficulties. This could be due to family circumstances, poverty, and discrimination, disability, family problems with mental health, domestic violence or substance and alcohol use. The more challenges facing a vulnerable adult the greater their vulnerability.

This safeguarding adult's policy is inclusive and the same actions should be taken regardless of the needs and background of the vulnerable adult. The Trust recognises however that some vulnerable adults are disadvantaged by their experiences and would want to highlight the following.

Vulnerable adults with disabilities

Research has consistently shown that vulnerable adults with a disability are more at risk of abuse. Disability may be visible such as Cerebral Palsy or invisible such as a learning disability. Many things contribute to this including:

- Poor practice resulting from not understanding the care and support the adults needs
- Attitudes and assumptions about disability
- Lack of awareness and the belief that disabled adults are not abused
- Factors linked to the impairment i.e. it may be harder to communicate or avoid the abuser if the adult depends on them.
- Targeting by abusers who may believe they are less likely to tell or be believed because of this The Trust may need to put extra safeguards in place. Best practice to build safeguards includes:
- Making sure everyone working with the vulnerable adult understands what the impairment actually means for the adult
- Talking to the adult and parents/carers to understand the adult's needs
- Making sure there is a plan to meet additional needs and that this is clear and shared with those who work with the adult
- Listening to what the adult says and communicates by their behaviour as well as their words or signs
- Making sure the adult knows who to go to and how to do so if they are worried about anything
- Observing carefully and getting to know the adult and understanding how they respond to different experiences
- Reviewing the adult's involvement regularly to help them get the most from the game
- Looking for the adult's abilities not their disabilities!

Vulnerable adults from minority ethnic groups

Vulnerable adults from minority ethnic groups are additionally vulnerable because they may be:

- Experiencing racism and racist attitudes
- Experiencing racism being ignored by people in authority
- Afraid of further abuse if they challenge others
- Subjected to myths, e.g. all people of a particular culture are good with
- Wanting to fit in and not make a fuss
- Using or learning English as a second language.

Supporting lesbian, gay, bisexual and transgender and vulnerable adults

Lesbian, gay, bisexual and transgender (LGB&T) young people come from all socio-economic backgrounds, religions, faiths, ethnicities and cultures. It is estimated that six per cent of the population is lesbian, gay or bisexual, so there's a good chance that in a group of 30 adults, at least two will be or will grow up to be lesbian, gay or bisexual.

Most adults will know LGB people too, including family and friends. In addition, a 2010 piece of research, funded by the Home Office, estimated that between 300,000 and 500,000 people in the UK may identify as transgender.

However, LGB&T people remain largely invisible across sports, and two thirds of LGB young people say they don't like team sports. This lack of visibility, as well as the misapprehensions about LGB&T people, contribute to an environment of homophobia and transphobia in sport.

This can potentially cause LGB&T young people and vulnerable adults to feel excluded, isolated or undervalued. We therefore all have a role to play in dispelling myths about LGB&T people, challenging homophobia and transphobia when they occur, and creating a football environment where everyone feels included. It's important to remember that people realise they are lesbian, gay, bisexual or transgender at different stages of their lives; so if a young person seems to identify in a certain way, it doesn't mean they will remain that way in the future.

It's also worth remembering that, when vulnerable adults come out or identify a wish to reassign their current gender it's often the first time they've told anyone and how they do that will often be in response to the way they think others will react. Let them decide how they feel and what, if any, identity, they feel they have, and be supportive.

"Many lesbian, gay or bisexual people in sport face discrimination simply because they are perceived to be different from the heterosexual 'norm': As well as causing many lesbian, gay or bisexual athletes to leave clubs or sport entirely, in the worst cases such negative treatment has resulted in self-harm or suicide". Source: CPSU Homophobic Bullying in Youth Sport, April 2011

Every vulnerable adult has the right to be treated with dignity and respect; this includes all adults who are openly lesbian, gay, and bisexual or transgender or are thought to be. A club culture that permits casual use of homophobic or transphobic language makes it all the easier for players to suffer name calling and bullying.

This can impact on a vulnerable adult's sense of belonging, self-esteem and therein achievement. Lesbian, gay, bisexual and transgender young people have the same needs as any other teenager. They'll enjoy, achieve and stay safe if they:

- Feel able to be themselves
- Feel valued for who they are
- Feel included and part of a community
- Have access to resources and information relevant to them
- Feel safe and supported
- Feel they have people to talk to if things aren't going so well

Don't make assumptions; it's impossible to tell whether a person is lesbian, gay, bisexual or transgender by the way they act, talk and dress or by who their friends are. Be positive when people come out and know what to say; offer them reassurance, listen and be supportive – direct them to where they can get further advice and guidance.

Don't discuss a vulnerable adults sexual orientation; with their parents/carers without their permission.

Protect vulnerable adults from bullying; all vulnerable adults have the right to grow up free from fear of bullying and that includes those people who are lesbian, gay, bisexual or transgender. Be inclusive; any football setting for vulnerable adults can make sure it's inclusive by creating zero tolerance for homophobic and transphobic bullying. Make sure you make use of The Trust's Equality and Anti-Bullying Policies

Dealing with bullying

No one deserves to be the victim of bullying. Everyone has the right to be treated with respect. The Trust will not accept or condone bullying and has defined bullying as a category of abuse. It is the responsibility of everyone, whatever their role, to ensure that bullying is dealt with appropriately.

Bullying can be defined as:

- Physical: hitting, kicking and theft
- Verbal: name-calling, constant teasing, sarcasm, racist, sexist or homophobic taunts or comments about disability, threats and gestures
- Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring or isolating. Bullying can take place anywhere but is more likely to take place where there is inadequate supervision, e.g. in the changing rooms or on the way to and from the football pitch - but it can also take place at a training session or competition.

The bully can be:

- A parent who pushes too hard
- A coach or manager who has a win-at-all-costs philosophy
- Someone intimidating another
- An official who places unfair pressure on a vulnerable adult.

The damage inflicted by bullying can often be underestimated. It can cause considerable distress to people, in some cases affecting their health and development. In extreme circumstances it can lead to self-harm.

Bullying as a result of any form of discrimination

Bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability.

Generally, these forms of bullying look like other sorts of bullying, but in particular it can include:

- Verbal abuse – derogatory remarks about young female players, suggesting they are inferior to boys; or that young black, Asian or minority ethnic coaches are not as capable as white coaches; spreading rumours that a young referee is gay, or that someone or something is inferior and so they are ‘gay’ – for example, “you’re so gay!” or “those trainers are so gay”. Ridiculing someone because of a disability or mental health related issue, or because they have a physical, mental or emotional developmental delay. Referring to someone by the colour of their skin, rather than their name; using nicknames that have racial connotations; isolating someone because they come from another country or social background etc.
- Physical abuse – including hitting, punching, kicking, sexual assault, and threatening behaviour.
- Cyberbullying – using on-line spaces to spread rumours about someone or exclude them. It can also include text messaging, including video and picture messaging. Discrimination is often driven by a lack of understanding which only serves to strengthen stereotypes and can potentially lead to actions that may cause women, ethnic minorities, disabled people, lesbian, gay, bisexual or transgender people, or people who follow specific religions or beliefs, to feel excluded, isolated or undervalued.
- Ensure that all staff and participants know that discriminatory language and behaviour will not be tolerated in the Trust.
- If an incident occurs, members should be informed that discriminatory language is offensive, and will not be tolerated. If a member continues to make discriminatory remarks, explain in detail the effects that discrimination and bullying has on people. If it is a young person making the remarks their parents should be informed just as in any breach of the Trust’s Code of Conduct and Anti- Bullying policy.
- If a member makes persistent remarks, they should be removed from the training setting in line with managing challenging behaviour procedures and the Trust Designated Safeguarding Officer or club officials should talk to them in more detail about why their comments are unacceptable
- If the problem persists, the member should be made to understand the sanctions that will apply if they continue to use discriminatory language or behaviour. Consider inviting the parents/carers to the club to discuss the attitudes of the participant in line with the procedures detailed in The Trust’s Anti-Bullying template policy.

Radicalisation

The Trust and all staff need to be aware of its responsibility under the Counter Terrorism and Security Act 2015, specifically Section 26, and the Prevent Strategy to safeguard pupils who are at risk of radicalisation by identifying and risk assessing individual who may be drawn into terrorism, violent or non-violent extremism. The Trust provide a safe environment for our participants to explore, understand and discuss sensitive topics including terrorism and extremist ideology. We use the curriculum and pastoral support to educate our participants and to enable them to challenge these

and to enable them to challenge these ideas. Staff should be aware of the risk posed by other young people and adults who may have been radicalised and the impact of radicalisation via social media. Staff will receive appropriate training, including Prevent, and have the knowledge and confidence to identify students at risk of being drawn into terrorism and extremism and challenge extremist ideals. Our IT filters are regularly reviewed in order to prevent access to terrorist and extremist materials online at the school.

Whistleblowing

The Public Interest Disclosure Act 1998 (“the Act”) protects workers and employees from detrimental treatment or dismissal as a consequence of disclosing information about unlawful actions of their employer or information about the conduct or behaviour of employees, volunteers or others associated with the operation and organisation of the Trust . This is known as “whistleblowing”. The protection applies to employees, volunteers, agency and contract workers. Employees who have a role involving finance should also have regard to the Financial Regulations document for their Trust which includes a Whistleblowing Policy containing specific provisions relating to financial issues.

If an employee/worker makes a disclosure it must concern one of the 6 types of “qualifying disclosure” specified in the Act to be protected. These are where there has been or is likely to be:

- A breach of any legal obligation;
- a miscarriage of justice;
- a criminal offence;
- a danger to the Health and Safety of any individual;
- damage to the environment; and,
- deliberate concealment of information about any of the above

The employee/worker raising the concern must reasonably believe they are doing so in the public interest. Concerns should normally be raised initially with the employee’s line manager. If a concern is raised verbally it should be followed up in writing wherever possible. However, where the complaint relates to the employee’s line manager, the complaint should be brought to the attention of a more senior manager, the CEO of the Trust or Chair of Trustees.

Cyberbullying

People are communicating more frequently online through social networking sites and via mobile – whilst a great way to communicate it also lends itself to potential abuse. Cyberbullying is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger), to deliberately upset someone. This behaviour can also be referred to as ‘Trolling’ when deliberately offensive comments are posted on an individual’s social media pages aimed at causing upset and distress. This type of behaviour could result in legal action.

Bullies often feel anonymous and ‘distanced’ from the incident when it takes place online and ‘bystanders’ can easily become bullies themselves by forwarding the information on. There is a growing trend for bullying to occur on line or via texts - bullies no longer rely on being physically near to the young person. The Trust has a responsibility to ensure their websites and/or social networking pages are being used appropriately and any online bullying must be dealt with swiftly and appropriately. Everyone should know that there are potential risks associated with meeting up with people they have only met online. A lesbian, gay, bisexual or transgender person will naturally want to meet other lesbian, gay, bisexual or transgender people with similar experiences, and they will seek friends they can relate to and a community where they can be themselves. This can make them particularly vulnerable in an online environment. It’s essential that they understand that healthy friendships are based on mutual respect and trust and where to turn for further advice and support. For more information visit www.stonewall.org.uk to speak with someone call 0800 050 2020.

Peer on Peer Abuse

- Features physical, emotional, sexual and financial abuse of adults by their peers
- It is influenced by the nature of the environments in which adults spend their time
- It often hinges upon adults experiences of power, and ultimately the notion of consent
- It is ultimately about unhealthy relationships and should be viewed as such e.g. domestic violence and relationships which are exploitative
- Sexting is a form of peer on peer abuse and should be dealt with as a matter of safeguarding by staff

Social media

Facebook, Twitter, blogs, instant messaging and photo and video exchange sites are now common ways of communicating. All of these online tools provide a useful way for everyone to connect with vulnerable adults. However the use of social networking sites also introduces a range of potential safeguarding risks.

So it's important that The Trust and its staff keep pace with how vulnerable adults are being communicated with and follow the best practice guidance and social media policy provided by Bristol City FC.

It is expected that any staff member working/volunteering/in a position of power at the Trust does not communicate with participants via personal social media.

Work phones or work email exchanges are permitted along with visible work social media accounts which include Facebook and Twitter. Any communication must be appropriate and in line with the staff code of conduct.

Photographing vulnerable adults and use of Images

We understand that parents/carers like to take photos of or video record participants when participating in activities whilst with the trust; this is a normal part of family life and, we will not discourage parents from celebrating their sibling's successes. However, if there are health and safety issues associated with this e.g. the use of a flash when taking photos could distract or dazzle the participant, and cause them to have an accident, we will encourage parents/carers to use film or settings on their camera that do not require flash.

We will not allow images of vulnerable adults to be used on the Trust/club websites, publicity or press releases without express permission from the parent/carer, and if we do obtain such permission, we will not identify individuals by name.

The Trust cannot however be held accountable for photographs or video footage taken by parents/carers or members of the public during Trust activities.

Photography will be used across the Trust's programmes as a tool to support assessment and to provide evidence of, and celebration of, progress on all programmes. However staff will not use personal cameras or mobile phones to do so. All Photos will be take on company devices.

Safer Recruitment of volunteers and staff

We are committed to ensuring that appropriate recruitment checks have been carried out as anyone may have the potential to abuse vulnerable adults, therefore all reasonable steps must be taken to ensure unsuitable people are prevented from working with vulnerable adults.

Proper recruitment and selection procedures will help to screen out those who are not suitable to work at the Trust.

We will ensure that we follow the steps set out here;

Planning and advertising

- Have defined role profiles which highlights the key responsibilities of the role for every job
- Decide upon the skills and experience the role will need; a person specification
- Be clear about what The Trust aims and philosophy are in our adverts/ information
- Reflect the Trust's positive stance on safeguarding and equal opportunities
- Use application forms to collect information on each applicant
- Ensure that more than one official looks at each application form
- Ask for original identification documents to confirm the identity of the applicant, e.g. passport or driving licence.

Interviewing

- Meet with all applicants prior to any recruitment decision
- Ensure more than one official is present. The meeting or interview will enable the Trust to explore further the information provided in the application form. Prepare in advance questions relating to safeguarding e.g. they

will provide the applicant with the opportunity to share previous experiences and give examples of how they have or would handle situations and explore their attitudes and commitment to welfare.

References

Managers will request at least two references from individuals who are not related to the applicant. One reference should be associated with the applicant's place of work and, if possible, one that demonstrates they have been involved in sport, particularly vulnerable adult activities, previously, or other voluntary work.

References should be followed up prior to any offer of appointment being made. If the references raise any concerns you are advised to contact the Designated Safeguarding Officer.

Disclosure and Barring Service Checks

The disclosure and barring service checks (DBS) are a tool in the Trust's recruitment process. A DBS contains impartial and confidential criminal history information held by the Police and government departments which can be used by the Trust to make safer recruitment decisions. It can indicate that a person is not suitable to work with vulnerable adults, for example if they have a history of sexual offending or offences against vulnerable adults. It may also tell authorities that further investigations are required, for example if the person has a history of drug dealing or racist offending.

All staff or volunteers with substantial access to vulnerable adults at the Trust have an Enhanced Disclosure and Barring Service check before starting work and prior to confirmation of employment.

The Trust will take into account the Rehabilitation of Offenders Act and only consider offences which are relevant to the care, supervision and training of the participants. This will take the form of producing a risk chart to fully understand the risk involved as well as gathering all of the information regarding previous convictions and offenses. Any decision would be made by consulting the Trustees, DSO, LADO, FA and other organisations involved before making a decision on the candidate.

During the DBS process, The FA is not allowed to tell the Trust about the actual offending and so applicants can be assured of confidentiality. The FA will however tell the Trust whether or not the person is considered suitable to work with vulnerable adults.

Appointing volunteers and staff

The Trust will consider all the information they receive via the application form, confirmation of identity, and the outcome of the take up of references and The FA criminal records check. This information will then be considered alongside the outcome of the meeting/ interview to make an informed decision as to whether or not to accept the applicant into the Trust.

Post appointment decisions

It is important that once a new volunteer/staff member has been recruited, follow up action is taken and this should include:

- Any qualifications are substantiated e.g. request to see copies of their coaching certificate(s)
- New volunteers are made aware and sign up to the club's/league's safeguarding policy and procedures, best practice guidelines and codes of conduct
- The roles and responsibilities of the new volunteer/staff member are signed up to
- Training needs are established and actioned
- A period of supervision/observation or mentoring is used to support the new volunteer; this is often referred to as an induction
- The FA's Safeguarding Children and Vulnerable Adults Workshop is completed or if it was taken over three years ago is renewed either online or via a Workshop.

Code of Conduct

It is expected that all Trust staff will read and sign a Trust code of conduct relating to their team and role. The staff code of conduct will set out the expectations of the member of staff in their role and can be referred back to in the event of any incident. A review of this code of conduct will be completed during the appraisal process at the end of each year.

For volunteers, a separate code of conduct will be presented when signing up to volunteer and it is the volunteer's duty to read, sign and follow the code of conduct.

As well as staff, any participants and students must also read and sign a code of conduct to ensure they are aware of the expectations within the session.

Further information can be found in the Safer Recruitment Policy.

Managing Risk

We naturally assess the potential for risks when planning activities. However, to ensure the welfare of all participants within our care it is important to always ask the following basic questions:

- What is the activity?
- Where is the activity going to take place?
- Are there any additional needs within the group? How do they affect the participant's ability and needs in terms of safe-guarding?
- Are there mixed groupings?
- What experience and qualifications do the organisers have?
- Are staffing or volunteer levels appropriate to the needs of the group?
- Do you have someone with the appropriate level of first aid training for the needs of the group?

It's important to also consider your familiarity with the venue and the level of responsibility you have for the activity e.g. at your home ground (which may or may not have access to telephone, toilet and changing facilities, first aid provision, secure perimeters) or an unknown ground that your club has to travel to. Local sports centres or community playing fields will have guidelines on use and types of facilities, which you may or may not have access to. Also be mindful of social activities at a non-football venue, which may or may not be known to you.

The principles for assessing potential risks remain the same whatever the activity, therefore you need to consider these and decide what ratio of adults to vulnerable adults you consider to be appropriate to ensure their safety. Adult/participant ratios must be based on the age and understanding of the people involved, the degree of risk the activity involves, and whether there are additional needs. The lower the age of the participants, the higher the ratio of staff should be. If the activity is mixed gender, male and female staff should ideally be available. Whatever the age of the vulnerable adults and type of activity, a minimum of two adults should always be present. This ensures at least basic cover in the event of an incident.

As rule of thumb staff should generally have a minimum of 1 adult to 16 participants. If the vulnerable adults have additional needs e.g. learning needs or a disability the ratio should be higher than 1:16 to ensure you can meet the specific needs of any given group. You may have Trust volunteers including FA Level 1 Coaches who are not yet 18. They cannot be considered an adult legally; therefore this affects the ratio of adults to young people. However, you can ask parents to come along in such circumstances. It is also important to consider the experience of the adults involved.

Lone working with individual participants should be avoided if at all possible. However, it is recognised that there will be occasions when there is no alternative. The following guidelines should be considered by staff:

- Let another member of staff know that they are alone with a participant
- Keep the door open to the room that they are in or ensure they are in a room with an uncovered glass panel in the door
- If this is a regular occurrence (such as regular individual lessons/work experience/transportation), the parent/carer should be informed of the situation
- Should anything happen during the session that makes the staff member uncomfortable, this should be reported to the Designated Safeguarding Lead immediately

Reporting

The term disclosure in this context is used to describe the sharing of concern(s) by one individual to another and not the Disclosure Barring Service formal record of an individual's relevant convictions. There is a legal and moral responsibility to report any concerns about a vulnerable adult in any context. The Trust will support anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a vulnerable adult, even if that concern is proved to be

unfounded. The following guidelines are relevant whether or not the vulnerable adult is involved in football. It is essential that you follow the correct procedures for any concerns that are related to BCCT settings.

Concerns may arise because:

- A vulnerable adult informs you directly that he or she is concerned about someone's behaviour towards them
- You become aware, through your own observations or through a third party, of possible abuse occurring. Most suspicions of abuse come about from observation of changes in the vulnerable adult's behaviour, appearance, attitude or relationship with others. Your suspicions may develop over time. The matter should be reported directly to the DSO who will then inform the LADO or the local Police.

What to do if a vulnerable adult discloses to you

If a vulnerable adult informs you directly that they are concerned about someone's behaviour towards them, this is known as a disclosure. A disclosure may be given slowly over time or all at once and it may seem incomplete, unclear and may sometimes be retracted. Vulnerable people don't often tell in one simple 'disclosure'. The person receiving the disclosure should:

- React calmly so as not to frighten the vulnerable adult
- Ensure the immediate safety of the vulnerable adult
- Tell the vulnerable adult that he or she is not to blame and that he or she was right to tell
- Take what the vulnerable adult says seriously
- If the vulnerable adult needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is safeguarding concern as it is their responsibility to refer this on appropriately to the Police.
- When speaking with the vulnerable adult keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Re-assure the vulnerable adult but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments
- In the event of suspicion of sexual abuse try to avoid the individual bathing or showering until given permission to do so. Washing can destroy valuable evidence
- Take a detailed written record of what the person said to you
- As soon as the vulnerable adult completes the disclosure make sure you accurately record what they said using their language and of any actions you may have taken as a result

Report the concern using the following online referral system

https://www.bristol.gov.uk/en_US/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk

The Trust's reporting procedures

Whether informed directly by a vulnerable adult via a third party, or through your own observations, you should follow the procedures outlined below.

- Ensure the immediate safety of the vulnerable adult
- If the vulnerable adult needs immediate medical treatment, call 999 for immediate assistance
- Report the concerns to the DSO immediately, unless the concern is about this individual in which case, report to the SSM
- If the DSO is not available, or the concern is about this person, report your concerns directly to the SSM, the First Response, local Police or the police.
- If the individual has a disability or extra communication needs share the needs with the people you report to so they can communicate effectively with the individual
- Once the information has been passed to the DSO, the DSO will then pass any information given on to the LADO, Police or First Response.
- Remember if the concern is about someone involved within a football setting and you are unable to contact the Trust Designated Safeguarding Officer, then you should also inform The FA's Safeguarding team on 0800 0835 902 or via email on safeguarding@TheFA.com and let them know what action, in line with FA/EFL procedures.

If you have any concerns about a vulnerable adult and the DSM or SSM is not around, do not leave it for someone else

to deal with, particularly if you think a person is being neglected or abused.

If you have immediate concerns about your own or someone else's safety, call the Police on 999. If it isn't an emergency but you need help fast, call the Police on 101.

If you suspect that an adult in Bristol with care and support needs is being abused or neglected but their health or welfare is not in immediate danger, contact Care Direct at www.bristol.gov.uk/social-care-health/report-suspected-abuse. You will be directed to different forms depending on whether you are a member of the public or a professional.

You can also call Care Direct on 0117 922 2700, 8.30am to 5pm, Monday to Friday. There's an answerphone service outside these hours.

If you have any concerns about a child or young person and the DSM or SSM is not around, do not leave it for someone else to deal with, particularly if you think a vulnerable adult is being neglected or abused.

All referrals and incidents that have been report will be stored securely on CPOMS and by the DSL via a password protected document. These files must not be shared and discussed outside of the safeguarding team and members of staff involved. Details of the reports must not be shared outside of the Trust or agencies involved.

Allegations made against staff

If anyone makes an allegation that any members of staff, governor or volunteer may have:

- Behaved in a way that has harmed a vulnerable adult, or may not have harmed an adult
- Possibly committed a criminal offence against or related to an adult
- Behaved towards a vulnerable adult in a way that indicates that he or she would pose a risk of harm to them

Then the allegation will be dealt with in accordance with national guidance and agreements as implemented by BSAB.

Allegations against a member of staff should be brought to the attention of the Designated Safeguarding Officer in the first instance, unless the DSO is the subject of the allegation, in this situation the allegation should be referred to the Safeguarding Senior Manager. If contacted with regard to an allegation against the DSO or the SSM, the Chair of Trustees will contact the Bristol City Football Club DSO to continue in line with Local authority guidance. An allegation must not be discussed with the alleged perpetrators or other members of staff/governors, unless advised to do so by the LADO.

Key Contacts

Bristol City Community Trust - Designated Safeguarding Officer: Chris Stenner (Head of Education- Education team)

Contact Number: 07500116137

Email: chris.stenner@bcfc.co.uk

Bristol City Community Trust – Deputy Designated Safeguarding Officer: James Howiantz (Primary Stars Lead Coach – Coaching team)

Contact Number: 07467148678

Email: james.howiantz@bcfc.co.uk

Bristol City Community Trust - Safeguarding Senior Manager: Dave Baker (Trustee)

Contact number: 07958744389

Email: dave.baker@olympustrust.co.uk

Bristol City FC Safeguarding Senior Manager: Doug Harman (Executive Director)

Contact Number: 01179 630600

Email: doug.harman@bcfc.co.uk

Bristol City FC Designated Safeguarding Officer: Jen Owsely (Academy)

Contact Number: 07989771081

Email: jen.Owsely@bcfc.co.uk

Local Authority Designated Officer LADO: Nicola Laird

Contact Number: 0117 9037795

Email: Nicola.laird@bristol.gcsx.gov.uk

The FA Safeguarding Contact:

0800 0835 902

safeguarding@thefa.com

Bristol Safeguarding Adults Board - <https://bristolsafeguarding.org/adults/>

Review Points

There is a commitment to review the safeguarding document on an annual basis with exception to any legislation/organisational changes or in the event of a series incident. Any changes will be reviewed by the LADO and will be subject to full board of trustee's agreement.

Version No.	Date of issue	Author	Approved by	Date of Approval	Review Date
1	21/9/18	Chris Stenner	Trustees	21/9/18	1/9/19
2	Pending	Chris Stenner	Pending	Pending	2/1/20
3					

*A signed hard copy of the policy will be available in the Community Trust office.

Bristol City Community Trust Safeguarding Incident Disclosure Form

Date of Report:			
Student Name:		Group/Session:	Date of Birth
Initial Concern Raised By:		To:	
Brief Summary:			
Child Protection - Yes/ No?			
Actions Taken			
Date	Action	By	Outcome
Parents Informed Yes / No (Why Not?)			
External Agencies Informed	Name	Contact No.	Outcome
Police (Details)			
LADO			
School Staff Informed (Names)			
Follow-up			
Please tick			
Form Completed By:			Date
<p>Maintained confidentially in the Safeguarding file</p> <p>Report any issues within 24 hours of them being disclosed</p>			

END