



# Safeguarding Adults at Risk Policy and Procedure

**Policy Name:** Safeguarding Adults at Risk Policy and Procedure

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**Approved by:** Wrexham AFC Board  
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## **1. Policy Statement, Principles and Aims**

### **POLICY STATEMENT**

Wrexham Association Football Club ('the Club') is committed to safeguarding and protecting children and adults at risk who engage in Club organised activities.

Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.

The Club is determined to ensure that all necessary steps are taken to protect from harm, those children and adults at risk who participate in organised activity by Wrexham AFC including the Academy, Women's and Community elements of the club.

The Club takes its responsibilities seriously in this area and we are committed to:

- Getting the right people involved through safe recruitment and training.
- Creating a safe environment for all visitors, participants and staff.
- Having and promoting clear systems to report and deal with any issues or concerns.

Collectively, Wrexham AFC has an ongoing duty and commitment to ensure the game is a safe, positive and enjoyable experience for the thousands of children, young people and adults who regularly play, watch, coach, referee and volunteer; participating within a broad spectrum of activities at the Club.

### **PRINCIPLES**

One of the most important principles of safeguarding is that it is **everyone's** responsibility. Each professional and organisation must do everything they can to ensure that children and adults at risk are protected from abuse.

The Board of Directors at Wrexham Association Football Club ('the Board') are committed to continually ensuring the well-being and safety of all children and adults at risk connected with our business activities, and to providing a safe and suitable environment for all those attending our premises for any purpose. It is the duty of all adults working in the Club to safeguard the welfare of children and adults at risk by creating an environment that protects them from harm.

If you work or intend to work with vulnerable groups, you are automatically placed in a Relationship of Trust that carries authority, status, power, and responsibility. If those involved are positive role models, displaying high moral and ethical standards, the benefits to that person's development can be significant. Football can and does have a positive effect on development; and is potentially an inspiration for all sections of our community

## **POLICY AIMS**

- To develop a safe and welcoming environment for children and adults at risk involved in all Club-led activities ensuring they are free from abuse and the fear of abuse in all its forms;
- To foster a culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role they play in keeping children, adults at risk, themselves and colleagues, safe from harm;
- To promote a clear system that supports constant alertness, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;
- To apply legislation, government policy and guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with statutory agencies and other partners to promote and safeguard the welfare of children and adults at risk.

## **2. SCOPE**

This policy and procedure is for use across the Club and is to be adhered to by all. Any safeguarding concerns regarding Children will fall under the Wrexham AFC 'Safeguarding Children' Policy and Procedure.

All the requirements of this policy are obligatory and are to be enforced where there are any suspected instances of poor practice or abuse. All employees, including full time, part time or casual as well as any consultants, partners or volunteers must make themselves aware of the Club's Safeguarding Adults at Risk Policy and Procedures.

The Board may amend this policy at any time. The Board will continue to review this policy to ensure it is achieving its aims.

Failure to comply with this policy may be treated as misconduct and be dealt with under our Disciplinary Procedure and if a breach amounts to gross misconduct this may result in dismissal, possibly criminal prosecution and reporting of any incident to the appropriate regulatory or investigative body.

The well-being of 'adults at risk' is paramount for all in the organisation and accordingly, they must read and fully understand this policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

All employees; casual workers, consultants, contractors and volunteers have the responsibility to report any concerns to the Safeguarding Lead.

The policy will be widely available at all Wrexham AFC facilities on request for those without access to the internet.

Activities undertaken at the following locations and departments are under the remit of this policy, including:

- Wrexham AFC Stadium including all matchday roles and activities that come into contact with children
- Wrexham AFC Academy (Colliers Park)
- Wrexham AFC Women (The Rock)
- Wrexham AFC Community Trust (the Trust)
- Travel, Events and Supporter Liaison
- Other club related entities and activities undertaken outside of the UK

The Club has a responsibility to maintain regular dialogue with the Local Safeguarding Adults Board. The Club will refer concerns that a vulnerable adult may be at risk of significant harm to Adult Social Services, the Police or in cases of suspected radicalisation to the Channel Scheme as appropriate. The Club will refer to Adult Social Services any incident or allegation against a person in Relationship of Trust.

### **Definition of an Adult at Risk**

An adult at risk is defined as someone who is aged 18 or over and:

- a) is experiencing or is at risk of abuse or neglect,
- b) has needs for care and support (whether or not the local authority is meeting any of those needs), and
- c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

*Social Services and Wellbeing (Wales) Act 2014*

Safeguarding adults at risk is defined as protecting adults who—

- i. have needs for care and support (whether or not a local authority is meeting any of those needs), and
- ii. are experiencing, or are at risk of, abuse or neglect, and
- iii. to prevent those adults from becoming at risk of abuse or neglect.

*Social Services and Wellbeing (Wales) Act 2014*

### **3. Safeguarding Strategy**

The Club's Safeguarding Strategy sets out the Club's strategic approach for the next three years to ensure that safeguarding arrangements are consistently considered, implemented, and improved. It presents the Club's guiding vision, its objectives, the actions, and measures through which outcomes will be achieved, and underpinning principles.

The strategy acts as a framework through which all those working at or with the Club can better understand and carry out their safeguarding responsibilities, so that adults at risk who engage with the Club can do so in a safe environment.

#### **Our Vision**

***"To create the safest and most welcoming environment for all participants in any and all Wrexham AFC related activities."***

***Humphrey Ker, Senior Safeguarding Manager***

The vision behind the strategy is to collectively promote and protect the safety and wellbeing of adults at risk across the Club, and to create a welcoming and secure environment for them in which they are supported, respected and safe.

#### **Our Priorities**

We will do this through:

- **CULTURE:** Encourage a Club-wide, shared commitment to safeguarding, ensuring that safeguarding considerations are embedded into the Club's culture and approach to all work.
- **PEOPLE:** Maintain a professional workforce made up of responsible individuals who are vigilant, proactive, and responsive in their attitude to safeguarding, and are aware of the processes for dealing with safeguarding concerns.
- **AWARENESS:** Provide safeguarding education and awareness both to those at the Club responsible for safeguarding and those at risk of harm, so that individuals are empowered to recognise, report, and speak about their concerns in a safe and supportive environment.
- **COMPLIANCE:** Actively monitor and review safeguarding arrangements, and adjust where necessary, to ensure that they are as effective as possible.
- **HORIZIONS:** Seek out and embrace new opportunities and technology that encourages any form of abuse is prevented from the outset.

## **Our Foundations**

We will achieve this following based on our foundations:

- **DIVERSITY:** Working together within our community to delivery our safeguarding vision
- **EMPOWERMENT:** To empower all those entrusted into our care
- **EQUALITY:** Treat everyone fairly and equality without exception
- **FAMILY:** Continue to champion our reputation as the original family club
- **INCLUSION:** We are committed to creating a welcoming and inclusive environment
- **RESPECT:** Promote a safe and supportive culture
- **TOGETHER:** The Board, staff and partners acknowledge that safeguarding and welfare is everyone's responsibility

## **4. Roles and Responsibilities**

### **Wrexham AFC**

Wrexham AFC believe that all children and young people have the right to take part in sport in a safe environment, free from any risk of abuse. All procedures in relation to children or young people are laid out within Wrexham AFC 'Safeguarding Children Policy and Procedures'.

We take all practical steps to reduce the risk of harm to children and adults at risk involved in any club activities and exercise our moral and legal responsibility to protect them.

### **Senior Safeguarding Manager (SSM)**

The Senior Safeguarding Manager for Wrexham AFC has governance for the Club's safeguarding provision, in consultation with the Club's Safeguarding Lead, and actively promotes safeguarding at Board level.

### **Safeguarding Lead (SL)**

The Safeguarding Lead acts as the first point of contact for all safeguarding matters within the club. The Safeguarding Lead will be responsible for case management and the development and monitoring of policy and procedures.

Main duties include but not limited to:

- Working with others at the club to create a positive approach to safeguarding adults at risk.
- Play a lead role in developing and establishing the club's approach to manage cases of poor practice and abuse reported to the club.
- Maintain accurate, confidential and up-to-date documentation on all cases of safeguarding and report where required in line with GDPR.

- Manage referrals to adult's social care services, single point of contact (SPOA) the police, the EFL, the FA and the FAW as and when required.
- Central point of contact for internal and external individuals and agencies.
- Represent the organisation at external meetings related to safeguarding.
- Coordinate the dissemination of policy, procedures and resources throughout the club.
- Provide advice and support to all members of staff, volunteers and associates of the club in relation to safeguarding concerns and queries.
- Advise on the club's training needs and the development of its training strategy; provide training where appropriate.
- Play a lead role in maintaining and reviewing the club's implementation plan for safeguarding and protecting adults at risk.
- Keep own knowledge up to date.
- To act, at all times, in a manner appropriate to a representative for the football club.
- Hold a commitment to equality and diversity in the workplace.
- Produce a quarterly report for the Senior Safeguarding Manager to present to the Board.
- Be a visible, accessible and approachable presence within the club environment.

### **Wrexham AFC Community Trust Safeguarding Officer (Head of Community)**

The Head of Community for the Wrexham AFC Community Trust, works closely with the Club's Safeguarding Lead to ensure continued safeguarding compliance within the Trust, pro-actively promoting and raising safeguarding awareness and assisting with responding appropriately to safeguarding incidents, concerns and allegations.

Main duties include but are not limited to:

- Work closely with the Club Safeguarding Lead, the Community Trust Board and Senior Safeguarding Manager to ensure that the Trust's compliance with statutory obligations under the relevant legislation and adherence to the rules and regulations surrounding safeguarding as laid down by the relevant governing bodies under the Community Trust is bound.
- Support Community Trust staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Conduct risk assessments for all extra-curricular activities including trips and tournaments.
- Provide advice, support and guidance on equality and diversity matters.
- Facilitate workshops providing education and resources for key safeguarding matters as appropriate.
- Be a visible, accessible and approachable presence within the Community Trust environment.



## **Safeguarding Working Group**

The Club's Safeguarding Working Group (SWG) will contribute and ensure safeguarding remains at the fore of all the Club's work. The Group has a collective responsibility to provide support to all departments operationally. The group maximises the diverse Club expertise and experience to help promote and ensure effective safeguarding, welfare, and wellbeing across the business and provide a positive influence and help foster a strong safeguarding and welfare culture within the Club. The group works collaboratively with the Senior Safeguarding Manager and support the operational needs of the Club and those outlined in the Safeguarding Standards framework to maintain effective communication measures and working relationships in relation to safeguarding and welfare across all the constitutes of the Club.

## **5. Good Practice and Code of Conduct**

To ensure adults at risk have the most positive and safe experience when engaging with the club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of potential allegations, abuse and neglect occurring):

- Listen carefully to adults at risk about their needs, wishes, ideas and concerns and take them seriously;
- Treat all adults at risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the adult at risk;
- If adults at risk have to be supervised in changing rooms always ensure coaches staff work in pairs;
- Request written consent if the club are required to transport adults at risk using the appropriate document for any significant travel arrangements e.g. overnight stays;
- Coaches maintain their qualifications and professional development, and ensure an up-to-date DBS check;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with adults at risk, including only engaging with adults at risk online with prior approval and through the club's social media channels;
- On trips and tours, ensure that adults should not enter an adult at risk's room unless there is a safety concern, in which case two adults should enter and also should not invite adults at risk into their rooms;

- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of adults at risk;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the club's vision and values and be an ambassador for those values;
- Ensure adults at risk adhere to their relevant Code of Conduct;
- Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;
- Reward effort as well as performance;
- Challenge unacceptable or inappropriate behaviour;
- Encourage adults at risk to take responsibility for their own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Safeguarding Concern Report Form (see Appendix);
- Recording safeguarding concerns on the Safeguarding Concern Report Form or the My Concern platform.

This list is not exhaustive.

## **6. Unacceptable Practice**

The following are examples that are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers:

- Unnecessarily spending excessive amounts of time individually with an adult at risk away from others;
- Being alone in changing rooms, toilet facilities or showers used by an adult at risk;
- Taking an adult at risk alone in a car or journey unless written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking an adult at risk to your home or places where they will be alone with you;
- Sharing a room with an adult at risk;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Using or allowing to be used, inappropriate language towards or in the presence of an adult at risk;
- Allowing an adult at risk to use inappropriate language unchallenged;
- Making sexually suggestive comments to an adult at risk, even in fun;
- Reducing an adult at risk to tears as a form of control;
- Allowing allegations made by an adult at risk to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that an adult at risk can do for themselves.
- Not recording safeguarding concerns on the Safeguarding Incident Form or 'My Concern' application;
- Sending inappropriate text messages or social media messages to an adult at risk;

- Having an adult at risk engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter, TikTok and Instagram; and
- Engaging with an adult at risk on 'one to one' personal electronic communications.

This list is not exhaustive.

## **7. Staff/Adult at Risk Relationships**

The Club provide advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with Adults at Risk. Staff found in breach of these rules or the Staff Code of Conduct may be subject to disciplinary action and/or a safeguarding investigation.

- Staff should ensure they maintain healthy, positive, and professional relationships with all Adults at Risk.
- Staff working with Adults at Risk are in a 'position of trust' in relation to them. Club personnel must not engage in any personal relationship with an Adult at Risk whilst that unequal power relationship exists.
- The Club disapproves of relationships between personnel and Adults at Risk for whom they have previously been responsible.

### **Abuse of Position of Trust**

All staff are aware that inappropriate behaviour towards Adult at Risk is unacceptable and is likely to be unlawful. At all times, their conduct towards Adult at Risk must be professional.

### **Advice for anyone concerned about the possible abuse of a position of trust**

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you should report this to the Safeguarding Lead using the contact details listed in the Appendix of this document. If these channels have been followed and you still have concerns, or if the matter relates to a Designated Safeguarding Officer or Club Safeguarding Lead please contact:

The **Safeguarding Manager** at the **EFL** on **01772 325940** or email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

**Wrexham County Borough Council Adult Safeguarding Team** on **01978 291100** or email [AST@wrexham.gov.uk](mailto:AST@wrexham.gov.uk) and an online referral form can be found at

<https://www.wrexham.gov.uk/service/adult-social-care/adults-risk-aar>

**If you believe someone is at an immediate risk of harm North Wales Police on 101 or 999 in an emergency.**

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

## **8. The 6 Principles of Adult Safeguarding**

The Social Services and Wellbeing (Wales) Act 2014 sets out principles that should underpin safeguarding of adults in all aspects of society, including sport and activity organisations.

**1. Empowerment** - People being supported and encouraged to make their own decisions and informed consent.

### **You should:**

- Talk to the adult if there are concerns –ask them what they want to happen, take account of their views, wishes, feelings and beliefs.
- Give people choice and control over decisions – get consent wherever possible for any safeguarding referrals. Only the adult themselves can consent.

### **The adult's voice**

*"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."*

**2. Prevention** – It is better to take action before harm occurs.

### **You should:**

- Create a culture that means participants feel able to discuss issues and know where to go if they have a concern
- Make sure clear, simple and accessible information is available about abuse and where to go for help
- Train staff in adult safeguarding
- Ensure committee members, coaches and especially welfare officers read this guidance, so they know the basics

### **The adult's voice**

*"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*

**3. Proportionality** – The least intrusive response appropriate to the risk presented.

### **You should:**

- When dealing with abuse situations, think about the risk.
- Make responses appropriate to the risk presented.
- Respect the person, think about what is best for them and only get involved as much as needed.

### **The adult's voice**

*"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."*

**4. Protection** – Support and representation for those in greatest need.

**You should:**

- Know what to do if there are concerns
- Know how to stop any abuse
- Know how to offer help and support for people who are at risk
- Encourage all personnel to do safeguarding adults training
- Identify who needs more in-depth training

**The adult's voice**

*"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."*

**5. Partnership** – Local solutions through services working with their communities.

Communities have a part to play in preventing, detecting and reporting neglect and abuse

**You should:**

- Work in partnership with each other and local communities.
- Play a part in preventing, detecting and reporting abuse.
- Have a stand-alone safeguarding adults policy and procedures that includes details of the Local Safeguarding Adults Board and Adult Social Care team
- Ensure that everyone knows about the policy and procedures

**What does this mean for the adult?**

*"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."*

**6. Accountability** – Accountability and transparency in delivering safeguarding.

**You should:**

- Understand that safeguarding adults is everybody's business.
- Everyone must accept that we are all accountable as individuals and clubs
- Roles and responsibilities must be clear so that people can see and check how safeguarding is done

**The adult's voice**

*"I understand the role of everyone involved in my life and so do they."*

## **Capacity – Making Decisions**

We make decisions every day, often without even realising, and may take this for granted. Some people can make every decision about their own lives. Some people can make some decisions and a small number of people cannot make any decisions. Being unable to make a decision is called "lacking capacity".

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.

In sport and activity, you do not have to be an expert in assessing capacity but try to follow the 5 principles:

1. Assume that people can make decisions, unless it is proven that they cannot – if you have concerns about a person's level of understanding attending one of your events you should check this with them and if applicable 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, you may be asked your opinion.
3. The right to make unwise decisions if you understand the implications – a person may want to play a contact sport even though they are unsteady on their feet. If they understand the implications then consider how risks can be minimised so they do not miss out, for example by using protective sports equipment.
4. Best Interests - If someone is not able to make a decision, then the people 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. If someone is having a decision made for them, then find the least restrictive way of doing what needs to be done.

## **Consent**

If you have concerns about an adult, you have a duty to report these to the Safeguarding Lead or Senior Safeguarding Manager. You do not need consent to discuss a concern with your safeguarding officer. Thinking about making safeguarding personal, it is good practice to have a conversation with the adult and inform them you are concerned and will pass this onto the safeguarding officer. If the concern needs to be referred to Adult Social Care this is when consent from the adult will be obtained. However, you can get advice from Social Care without giving details, do not let the issue of consent get in the way of getting advice.

## **Procedures**

### **8. Safer Recruitment**

#### **Introduction**

This policy aims to provide a clear framework for safely recruiting and selecting appropriately experienced and qualified staff and volunteers fairly and transparently.

The policy applies to anyone involved in recruitment and selection, as well as third parties who recruit and select on behalf of Wrexham Football Club Ltd (the Club); and to both internal and external candidates.

#### **Safer Recruitment**

The Club recognises that anyone may have the potential to harm or abuse children or adults at risk in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or adults at risk. We will act reasonably in making decisions about the suitability of the prospective candidate based on checks and evidence including the Disclosure and Barring Service (DBS), barred list checks together with references and interview information. The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant.

For further details and procedures please refer to the Safer Recruitment and Selection Policy.

### **9. My Concern and My Voice**

My Concern is a secure on-line based software system used by the Club to report, record and monitor safeguarding, well-being and pastoral issues, as well as enabling the Club to identify trends and patterns of harm and abuse, allowing early intervention to support all of our at risk groups.

My Voice is a quick, easy and anonymous reporting of Safeguarding concerns across the wider community; with all reports feeding into the My Concern system.

My Concern and My Voice is used extensively throughout the Club, and all full-time, part-time and voluntary staff, along with players, parent/carers, members of the public, match officials and anyone who partakes or watches activities held at the Club have access to the system allowing them to raise and share concerns including poor practice and confidential reporting directly with the Safeguarding Lead and senior leaders.

All part-time and full-time staff are provided with induction training and a tailor-made account which features a two-factor login feature.

Staff can access the secure system via <https://myconcern.thesafeguardingcompany.com/>

## **10. Safeguarding Reporting Process**

Safeguarding concerns will fall into one of the following types:

- the behaviour of another towards an adult at risk;
- risks identified through recruitment processes e.g. a positive disclosure;
- information about an individual provided by statutory agencies or another route;
- allegations of abuse; or
- concerns about harm to an adult at risk that has taken place outside of a Club activity e.g. at home but identified within a Club activity.

For members of the Club workforce these concerns may apply to both their professional and personal lives and alleged poor conduct may affect their position in the workplace.

### **How to Raise a Concern**

Safeguarding is **everyone's** responsibility. Each member of the Club's workforce has a duty to report any concern about a child or adult at risk. Remember – **INACTION IS NOT AN OPTION.**

If there is an immediate risk of harm, a serious injury or a criminal offence committed, the Police or other emergency services must be involved at the earliest opportunity.

#### **Step 1**

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Safeguarding, Welfare and EDI Lead. When raising your concern remember to involve the person. 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.

**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.**

#### **Step 2**

If you feel unable to raise the matter with the Safeguarding Lead for whatever reason, raise the matter with the Club's Senior Safeguarding Manager.

#### **Step 3**

If these channels have been followed and you still have concerns, or if the matter relates to a Designated Safeguarding Officer or Safeguarding Lead please contact:

The Safeguarding Manager at the EFL on 01772 325940 or email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

SPOA Adults – contactable 8:30 - 5 (Mon – Thursday) 8:30 – 4:30 (Friday)

[AST@wrexham.gov.uk](mailto:AST@wrexham.gov.uk) / 01978 258086. Link to public website [Adults at risk \(AAR\) | Wrexham County Borough Council](#)

North Wales Police on 101 or 999 in an emergency



North Wales Police [Web Chat](#)

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

The Club is committed to protecting children and young people and will act to uphold this commitment.

### **What to do if you suspect abuse or poor practice has occurred?**

If you are concerned about the welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that someone else will help the child. Safeguarding children is everyone's responsibility.

It is important that you report your concerns to either one of the following using the contact details in the Appendix:

- Senior Safeguarding Manager
- Safeguarding, Welfare and EDI Lead

*Don't think "what if I'm wrong?" think "what if I'm right?"*

### **What to do if you receive a safeguarding disclosure from an adult at risk?**

#### **Stage 1**

Deal with the disclosure as it happens and ensure that adult's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the adult who may be at risk.

You must:

- Remain calm, put your own feelings aside and listen.
- Allow the adult to lead the discussion and to talk freely.
- Use TED (Tell me, Explain to me, Describe to me) to obtain the relevant information but do not use too many questions
- Let them tell you at their own pace. Silences are OK. You do not have to rush to fill in the gaps.
- Record the conversation accurately and as soon as possible after the disclosure using the words or phrases described by the adult.
- Accept what the adult says without challenge.
- Provide reassurance that you are taking them seriously and they are doing the correct thing by speaking out.
- Never ask questions that may make the adult feel guilty or inadequate.

- If physical abuse has taken place, you may observe visible bruises and marks but do not ask the adult to remove or adjust their clothing to see them. Make a note of the injuries and upload the detail to the body map within the MyConcern platform.
- Tell the adult that you will be contacting the Safeguarding Lead and that you will support them throughout.
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting adults at risk.

You must not:

- Panic or show that you are shocked;
- Document the conversation whilst the adult is disclosing;
- Investigate;
- Give the impression that the adult is to blame;
- Ask leading questions;
- Pass judgement on what is being said;
- Make promises of confidentiality;
- Approach the alleged perpetrator.

Remember:

When an adult discloses they may feel:

- Guilt: They may blame themselves for the abuse and often feel guilt for telling.
- Ashamed: They may feel mortified about the abuse itself.
- Confused: They may be muddled about their feelings for the alleged abuser.
- Scared: They may be scared of the repercussions. They may be scared of the alleged abuser.

## **Stage 2**

As soon as possible, once the immediate comfort and safety of the adult at risk is secured, you must inform a member of the Safeguarding Team of the disclosure using the contact details in the Appendix. You may make a referral yourself directly to a statutory agency if you are concerned about the adult's immediate safety and/or are having difficulty contacting a member of the Safeguarding Team or if the perpetrator is a member of the Safeguarding Team. If this is the case, the Senior Safeguarding Manager must be informed. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

## **Stage 3**

The Club's Safeguarding Concern Reporting Form (see Appendix) must be completed as soon as possible following the disclosure and email this to the Safeguarding Inbox within 24 hours using email: [safeguarding@wrexhamafc.co.uk](mailto:safeguarding@wrexhamafc.co.uk)

All staff trained in the use of the MyConcern online platform must record a concern which will automatically inform the Senior Safeguarding Manager and Safeguarding Lead by email.

Immediate notes should include:

- Who are you? What is your role? How can the Safeguarding Lead contact you?
- Date and Time of incident
- Place and context of disclosure or concern
- Important facts provided, e.g. names of those involved
- What is the current position regarding those involved?
- Who knows what information? Who informed them?

### **What happens next?**

All concerns are to be followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Safeguarding Lead within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the designated Senior Safeguarding Manager or if unavailable a member of Club's Senior Management, and ultimately contact the relevant statutory agency.

NOTE: A disclosure is not the only way that you may be made aware of an issue. Any person may inform you of a concern or a possible abusive situation. There may be an instance when a member of staff has witnessed an incident that may cause concern or be made aware of a concern by a third party. It is important to stress that the same process is to be followed.

### **Record keeping and Confidentiality**

The Club will record all incidents and concerns using the Safeguarding Concern Reporting Form (see Appendix) or recording the information directly to the online reporting platform 'My Concern'. All such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. The Safeguarding Lead will regularly review reported concerns in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with General Data Protection Regulations notwithstanding the Club's obligations to information share with statutory partners and football authorities.

## **14. Low Level Concerns**

Wrexham Association Football Club believes every child, young person and adult at risk who participates our activities should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in Club activities. Wrexham Association Football Club recognises its responsibility to safeguard the welfare of all children, young people, and adults at risk by seeking to protect them from all forms of neglect and abuse.

Wrexham Association Football Club recognises that a critical step to safeguarding is to ensure that all those who work with children, young people and adults at risk in our sport, behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

Wrexham Association Football Club aims to create and embed a culture of transparency and confidence within our Club to enable all concerns about an individual's behaviour (including those below the referral threshold) that are below the expected standards and values of our organisation and does not meet the organisational expectations encapsulated within our Safeguarding Policies and Procedures, can be shared responsibly, with the right person, enabling them to be dealt with promptly and appropriately.

These reports should be recorded under the My Concern or My Voice platform.

## **15. Complaints and Public Interest Disclosure**

### **Complaints Procedure**

Wrexham Association Football Club welcomes information from participants, parents and carers in order to improve the overall experience in every area of the Club's activities. This complaints procedure highlights the responsibility of staff at the Club to respond to complaints within three working days of receipt. If a complaint requires additional investigation, the reporting person will be notified of this. All correspondence received is passed to the Head of Human Resources to assess the nature and the extent of each matter before being passed to the relevant Head of Department and in respect of a safeguarding complaint, to the Safeguarding Lead, in order for the appropriate action to take place.

Complaints can be made via the following contact lines:

Email: [info@wrexhamfc.co.uk](mailto:info@wrexhamfc.co.uk)

Telephone: 01978 89 1864

Post: Wrexham AFC, STōK Cae Ras, Mold Road, Wrexham, Wales, LL11 2AH

The vast majority of supporter and customer complaints are successfully concluded by the Club. However, if a supporter is not completely satisfied with the outcome of their complaint, they should refer the matter directly to The Independent Football Ombudsman (IFO).

Complaints should be made in writing and emailed to: [contact@theifo.co.uk](mailto:contact@theifo.co.uk). Complaints

may be submitted by post to: The Independent Football Ombudsman, Suite 33, Great George Street, Leeds, LS1 3AJ or by telephone (voicemail) on 0800 588 4066. Further information can be found at their website: 'theifo.co.uk'.

### **Whistleblowing (Public Interest Disclosures)**

The Club views the reporting of concerns by members of its workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol have been breached by another member of staff.

These reports should be made to the Head of Department who will make every effort to retain confidentiality.

If your concerns relate to the Head of Department, they should be reported to the Head of HR by email: [hr@wrexhamafc.co.uk](mailto:hr@wrexhamafc.co.uk)

### **16. Managing Allegations against Staff**

It is important that all allegations made against staff are reported immediately to the Safeguarding Lead and who will refer the matter to the Head of HR and the Designated Officer for Safeguarding at Wrexham Adult Services . A referral to the Affiliated Football Bodies will be made within 24 hours.

Set procedures must be followed when an allegation is made against a member of staff in a position of trust as they are responsible under the Social Services and Wellbeing (Wales) Act 2014. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to adults at risk and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and adults at risk are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

It is important to add that the Football Association may impose an interim suspension depending upon the circumstances as reported.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Subject to restrictions on the information that can be shared, the Head of Department should, as soon as possible, inform the member of staff about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action and/or referral to the Disclosure and Barring Service or regulatory body).

- The member of staff should:
- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be offered appropriate sources of support;
- Be kept informed, at agreed times, of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- If suspended, be kept up to date about events in the workplace.

### **Non-Recent Allegations**

All allegations concerning staff who are no longer employed at the Club, or allegations of non-recent abuse or poor practice must be reported to the Safeguarding Lead who will refer the matter to the North Wales Safeguarding Board and the Police if necessary. This process is to be adopted even if it is established that the alleged perpetrator of the abuse/poor practice is deceased.

### **17. Reporting Procedure for the Safeguarding Lead.**

The Club and its staff are not experts in adults at risk protection and will refer issues to appropriate agencies. Upon being notified of an allegation of abuse against a member staff:

- The Safeguarding Lead will ask for a written factual statement (using the Safeguarding Concern Reporting Form) from the person making the report – this must be signed and dated or a completed online version using the MyConcern reporting platform.

If any statement has been made by the adult at risk, this should be reported in their own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement.

- If the report involves an allegation about a member of staff, this will be referred to the Single Point of Contact for Wrexham County Borough Council Adult's Services within 24 hours or as soon as practicable.

Otherwise, if abuse is suspected, the Safeguarding Lead will contact Adult Social Care where the incident occurred or where the adult at risk lives. Adult Social Care may involve the police.

The Safeguarding Lead will notify the FA Safeguarding Team, the English Football League and the Football Association of Wales using the Affiliated Football Referral Form within 24 hours or as soon as practicable.

The Head of Department, the Head of Communications and the Head of HR will be informed of the referral.

The adult at risk and/or carer will be contacted as soon as possible following advice from Adult Social Care or the Police.

- The Safeguarding Lead or line manager will ensure that any adult at risk concerned is immediately removed from any possible risk of harm.
- Once Adult's Social Care has been informed and the incident accepted as a referral or notification, the Safeguarding Lead will notify the Club's Chief Executive Officer and Senior Safeguarding Manager in writing.
- All information will be dealt with confidentially and shared only with the people on a need-to-know or who-must-know basis.
- If the Safeguarding Lead is implicated, the Club's Chief Executive Officer and Head of HR should be contacted who will inform Adult's Social Care in line with the procedure in this section.

## **18. Staff Training**

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

Staff should be aware of systems within the Club which support safeguarding. This includes:

- the Club's Safeguarding Adults at Risk Policy and Procedure;
- Safer Working Practice;
- the details of the Safeguarding Lead.

All staff members should also receive appropriate safeguarding information which is regularly updated. The minimum being:

For staff working with adults at risk in Regulated Activity:

- The recommended Ann Craft Trust Safeguarding Adults in Sport training (or equivalent) every three years

For other staff working with adults at risk in a position of authority and trust:

- appropriate safeguarding information and/or training annually;

For all other staff:

- Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.

## **New Staff**

All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding adults at risk policy and safe working practices on their activities, as well as identification of their safeguarding training needs. They will be required to sign the Safer Working Practices Guide. We will also work with participants and parents/carers to raise awareness of safeguarding issues that may affect them e.g. social media issues.

## **Supply staff and other visiting staff working with adults at risk.**

Workers in this group will be given a "Safer Working Practice" booklet. All staff will be made aware of the increased vulnerability and risk of abuse of adults at risk.

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation. Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.

## **18. Prevent**

The Prevent Agenda was set up as part of the Governments wider counter-terrorism strategy called CONTEST.

It is a UK-wide strategy that aims to stop people becoming terrorists or supporting terrorism.

The strategy's three objectives are:

- To challenge the ideology that supports terrorism.
- To protect vulnerable people.
- To support sectors and institutions where there are risks of radicalisation.

Wrexham Association Football Club has a legal duty to prevent those participating in a learning environment from being drawn into extremism and radicalisation. The Club, in conjunction with its education providers and statutory partners, conducts an annual Prevent Self-Assessment and Action Plan. This supports the Club's commitment to its Equality Policy and overarching duty to protect all persons involved in Club activities as staff, volunteers or participants.

## **What is 'Radicalisation'?**

Radicalisation is a term that refers to a process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.



## **What is Extremism?**

Vocal or active opposition to fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

## **What are British Values?**

Democracy – Over 18-year olds can vote in local and general elections.

The Rule of Law – We understand the importance in having laws which protect us and know the consequences of breaking laws and rules.

Tolerance of those of different faiths and beliefs – We are part of a culturally diverse society

Individual liberty – We have the freedom to make choices about leisure activities we take part in

Mutual Respect – We treat each other with respect.

What makes someone at risk of radicalisation?

The following factors have been identified as increasing an individual's risk of radicalisation:

- Struggling with a sense of identity.
- Questioning their place in society.
- Family issues.
- Experiencing a traumatic event.
- Experiencing discrimination.
- Difficulty in interacting socially and lacking empathy.
- Difficulty in understanding the consequences of their actions.
- Low self-esteem.

## **How to Spot the Signs of Radicalisation**

There is no single pathway towards radicalisation – it is usually a combination of behaviours that are different to each person, according to their personal vulnerabilities.

The following behaviours could be an indication that an individual is becoming radicalised:

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views.
- Using derogatory language.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.
- Secretive about who they talk to online and which websites they visit.

## **Reporting Terrorism and Suspected Radicalisation**

If you suspect someone is involved in terrorism in any way or that someone has been radicalised, you can call the police on 101. You can remain anonymous throughout this process.

If a Prevent concern is identified in relation to an adult, a referral via the All Wales Prevent Referral Form should be submitted into the Welsh Extremism & Counter Terrorism Unit (WECTU). Please see the below links.

<https://digitalservices.south-wales.police.uk/en/all-wales-prevent-partners-referral-form-english/>

<https://digitalservices.south-wales.police.uk/cy/all-wales-prevent-partners-referral-form-welsh/>

If an individual presents with additional care and support this referral should be accompanied by a referral into Adult Safeguarding via email to: AdultsSPOA@wrexham.gov.uk or telephone 01978 291100. If you wish to discuss your concerns with a Club member of staff, please contact the Safeguarding Lead at email: safeguarding@wrexhamafc.co.uk

You can report online material that promotes terrorism or extremism on the GOV.UK website <https://www.gov.uk/report-terrorism>

Alternatively, you can call the Anti-Terrorist Hotline anonymously on 0800 789 321.

## **19. Photography and Images**

The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club and positive reflections of our Club operations. We understand however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances.

During the course of our activities it is foreseeable that a child or adult at risk's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and on-line via websites and social media.

### **Consent**

Where an activity may allow for the capture, and thus use, of a participant's image, the person responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent or participant consent in respect of an adult at risk and ensure that those individuals understand what they are consenting to and why. Consent must provide a genuine choice to be valid.

### **Legitimate Interest**

When images are taken for identification or coaching purposes, consent is not normally the appropriate condition for capturing and using such images in this way.

Parents/carers/guardians of children and adults at risk must be aware that images are being used in this way. Should there be any issues arising out of images being processed for the Club's legitimate interests they may contact our Data Protection Officer on email: [dpo@cwrexhamafc.co.uk](mailto:dpo@cwrexhamafc.co.uk). Details of all processing activities are documented in the Club's privacy notices available from the Club website.

### **Opt Out**

Other than on match / public event days (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed or object to their image being used as part of a legitimate interest. The workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with guardianship or parental responsibility for the individual and must uphold the dignity of the participant opting out.

### **Storage**

All images, whilst held by the Club, will be securely stored on the Club's IT systems and remain the property of the Club at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's or adult's at risk names in resulting public use.

### **Match Day, Public Events, Incidental Image Capture & Consent**

Large crowds may create further questions with consent and image use. At events such as matches, concerts and special public events, explicit consent is not required as there is a reasonable expectation that any person attending may have their image captured or broadcast. In any situations where adults at risk may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that an image of an adult at risk has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

### **Matchday photography**

Adults at Risk attend games as spectators and may appear as part of the crowd on matchdays and be reproduced in official Wrexham Association Football Club promotional material and appear in the public domain.

By entering the Ground, all persons are acknowledging that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be taken of them and may also be used, by way of example and without limitation, in televised coverage of the game and/or for promotional, training, editorial or marketing purposes by the Club, the EFL or others (including commercial partners and accredited media organisations) and entry into the Ground constitutes consent to such use. There is further acknowledgment that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be used (by the Club or by a third party, such as a law enforcement body) to identify individuals, where permitted by data protection laws, for the purposes of preventing or detecting crime, or any breach of Ground Regulations.

Any queries on promotional material featuring an adult at risk should be addressed to the Safeguarding Lead who can be contacted by email: [safeguarding@wrexhamafc.co.uk](mailto:safeguarding@wrexhamafc.co.uk)

The Club accepts no liability for non-Wrexham images and reserves the right to prohibit the use of any photography, video or film on its activities or premises. This includes match days.

## **20. Social Media and E-Safety**

All members of society increasingly use electronic equipment daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat and Instagram.

Unfortunately, some perpetrators will use these technologies to harm children and adults at risk. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children and adults at risk to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Children and adults at risk may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

### **Cyberbullying**

Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities.

The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

### **Staff Communication**

Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone and Club email address. This ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with adults at risk from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place).
- On all social media, any requests from adults at risk or their parents/carers should be rejected.
- Concerns arising from contact on social media from adults at risk should be directed to the Safeguarding Lead. This will help to avoid blurring boundaries between personal and professional life.
- Staff should take care on how they present themselves in the public domain (e.g. internet, media) and their association with Wrexham Association Football Club.
- Staff should use a disclaimer on social media with wording such as 'these views are my own views and not those of the Club'.
- Staff should direct any queries/clarification on this to the Safeguarding Lead

As a general policy, communication with adults at risk is via the Club through the parent/carer or school/college/organisation. However, the Club recognises that direct communication with adults at risk may be required on certain activities for professional and

welfare purposes and in such circumstances the Safeguarding Lead should be consulted, and protocols put in place and appropriate consent obtained from the parent/carer.

**Filtering:** Wrexham Association Football Club has an appropriate filtering system that manages the following content: discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence and gambling.

## **21. Matchday Procedures**

Wrexham Association Football Club works tirelessly to provide the best facilities for our disabled supporters including Adults at Risk. The Club prides itself on being inclusive to all. We understand and recognise that disabled supporters may need assistance when visiting the Racecourse Stadium to enjoy their experience. We offer reasonable adjustments based on individual needs.

Further information is available on the Club website at

<https://www.wrexhamafc.co.uk/supporter-information/disabled-policy/>

The Club's Disability Access Officer (DAO) Kerry Evans can be contacted via email at

[Kerry.evans@wrexhamafc.co.uk](mailto:Kerry.evans@wrexhamafc.co.uk)

### **Searching adults at risk**

To ensure the safety and security for all club activities all adults at risk may be subject to the club's search process. Adults at risk are asked to self-search as the preferred method; however, should the club suspect that the adult at risk may be concealing a prohibited item, consent will be sought from the adult at risk and/or their carer before a Steward or Security member of the same sex being observed by a Supervisor, searches the adult at risk.

### **Additional Information**

#### **Risk Assessments**

For all club activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The club's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the club learns from such matters.

Where an adult at risk is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the club's care. The risk assessment should set out what arrangements are in place for his/her care and supervision and how risks will be minimised. Activity leaders will be required to continually update risk assessments whilst leading such activities.

## **Supervision of adults at risk**

The Club adheres to best practice guidance from the local authority in relation to the supervision of club staff to adults at risk. Generally, there should always be a minimum of two members of staff and ratio of:

- One member of staff to every ten adults at risk.
- Activities may require more or less club employees to adult at risk ratios due to:
- Needs and capacity of the adults at risk;
- Nature of the activity and environment;
- Risk assessments or intelligence information identifying potential behavioural or other issues;
- Expertise and experience of the staff involved;
- Mixed gender adult at risk activities will require adults of both genders to supervise where possible.

Should the ratio not be suitable, the club's Safeguarding Lead will decide as to whether the activity or event takes place.

## **Working with external partners**

The Club always ensures external partners and organisations we engage with, promote the safety and welfare of adults at risk and this is outlined in contracts and/or service level agreements.

External partners and organisations are required to demonstrate competencies in safeguarding and the Club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Club's Policy and Procedures.

## **Confidentiality**

Every effort will be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

- The Safeguarding Team;
- The adult at risk or the person raising the concern;
- The carer of the adult at risk who is alleged to have been abused, where appropriate;
- Local Authority and Police;
- Dependent on role, the National Governing Body.

## **Information sharing**

The Club abides by the 7 guiding principles as set out by HM Government on sharing information:

1. The General Data Protection Regulation 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about an adult at risk is shared appropriately;

2. Openness and honesty with the adult at risk (and/or their carer/family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;
3. Advice is sought from the Club's Safeguarding Lead if there is any doubt about sharing the information concerned, without disclosing the identity of the adult at risk where possible;
4. Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the club's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;
5. Safety and well-being of the adult at risk is always considered;
6. Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;
7. Records of the club's decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on the Safeguarding Concern Report Form (see Appendix) and the online platform 'My Concern'.

The Club will share information with the relevant statutory agencies, the Premier League, EFL, The FA and FAW where appropriate in relation to safeguarding cases.



## **Appendices**

### **(a) Glossary**

**The Care Act** defines additional types of abuse related specifically to safeguarding Adults at Risk which are described below:

**Bullying:** Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

**Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

**Financial or material abuse:** Stealing from a vulnerable person, 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.

**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.

**Neglect/acts of omission:** Ongoing failure to meet the basic needs of Children and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Children and Adults at Risk are safe and adequately supervised or exposing Children and Adults at Risk to unnecessary risks.

**Organisational:** Neglect and poor care practice within an institution or specific care setting such as a hospital, care home or where care is provided within an Adult at Risk'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 or practices within an organisation.

**Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine

that they do not need and/or that may harm them or application of inappropriate restraint measures.

**Self-neglect:** Neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding.

**Sexual abuse:** Any act which results in the exploitation of Children and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

**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.

A person's disability or age 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.

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.

**Adult at Risk** is an adult who:

- (a) is experiencing or is at risk of abuse or neglect,
- (b) has needs for care and support (whether or not the authority is meeting any of those needs), and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

**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 (Mental Capacity Act 2005).

**County lines:** The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children and Adults at Risk. Gangs recruit Children and Adults at Risk through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

**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.

**Domestic Abuse and coercive control** – including psychological, physical, sexual, financial and emotional abuse. It can occur between any family members. It also includes so called 'honour' based violence which relates to a collection of practices used to control behaviour within families to protect perceived cultural and religious beliefs and/or honour.

**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.

**Female genital mutilation (FGM):** Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

**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 made it a criminal offence to force someone to marry. The forced marriage of adults occurs when the adult does not have the capacity to consent to the marriage.

**Grooming:** The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

**Hazing:** Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Children and Adults at Risk.

**Infatuations:** Children and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/her, or with a colleague, should discuss this at the earliest opportunity with a member of the Safeguarding Team.

**Making Safeguarding Personal** means placing the adult at the centre of the safeguarding process. The adult's views and desired outcomes should always direct the safeguarding process.

**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.

**Peer-on-peer abuse:** Children and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

**Poor practice:** This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children and Adults at Risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children and Adults at Risk, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

**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.

**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.

**Well-being duty.** People have a responsibility for their own well-being, supported by their families, friends and communities. Well-being includes protection from abuse and neglect (Section 5 Social Services and Well-Being Act (Wales) 2014).

### **Bullying & Cyber-Bullying**

Bullying and cyberbullying can happen to any child or adult at risk. Wrexham Association Football Club pledges to help keep them both safe from bullying, wherever it happens.

#### **What is Bullying?**

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at Club activities, at school, at home or online. It's usually repeated over a long period of time and can hurt both physically and emotionally.

Bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone
- verbal bullying: name calling, gossiping or threatening someone
- non-verbal abuse: hand signs or text messages
- emotional abuse: threatening, intimidating or humiliating someone
- exclusion: ignoring or isolating someone
- undermining, constant criticism or spreading rumours
- controlling or manipulating someone
- making silent, hoax or abusive calls
- racial, sexual or homophobic bullying
- bullying someone because they have a disability.

#### **What is cyberbullying?**

Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow wherever the child or adult at risk go, via social networks, gaming and mobile phone.

Cyberbullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a person
- encouraging persons to self-harm

- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children or adults at risk into sending sexual images or engaging in sexual conversations.

### **Signs of bullying**

No single sign will indicate for certain that a child or adult at risk is being bullied, but watch out for:

- belongings getting 'lost' or damaged
- physical injuries, such as unexplained bruises
- being afraid to leave the house, being mysteriously 'ill' each morning, or skipping school/college or scheduled appointments
- asking for, or stealing, money (to give to whoever's bullying them)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

### **Effects of bullying**

The effects of bullying can last for many years. At its worst, bullying has driven children, young people, and adults at risk to self-harm and even suicide.

Those who are bullied:

- may develop mental health problems like depression and anxiety
- have fewer friendships
- aren't accepted by their peers
- are wary and suspicious of others
- have problems adjusting to school, and don't do as well.

All those affected by bullying can suffer harm – whether they are bullied, they bully others, or they witness bullying.

### **Who's at risk -**

Any child or adult at risk can be bullied for any reason. If they are seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

### **Reporting Bullying**

The concern reporting process is detailed in Part 13 of this document. Wrexham Association Football Club will take all reports of bullying, discrimination and harassment seriously and adopt the appropriate process to ensure the reporting person is protected from repeat behaviour.

Wrexham Association Football Club is a supporter of the annual Anti-Bullying Week facilitated by the Anti-Bullying Alliance.

You may also wish to access any of the following websites designed to give advice and guidance to parents, carers, adults at risk and children who are faced with dealing with bullying:

### **Guidance for parents/carers**

[www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

[www.stonewall.org.uk](http://www.stonewall.org.uk)

[www.kickitout.org](http://www.kickitout.org)

[www.bullying.co.uk](http://www.bullying.co.uk)

### **Guidance for young people and adults at risk**

[www.anncrafttrust.org/help-advice/](http://www.anncrafttrust.org/help-advice/)

[www.youngstonewall.org.uk](http://www.youngstonewall.org.uk)

[www.kickitout.org](http://www.kickitout.org)

[www.childline.org.uk](http://www.childline.org.uk)

## **Safeguarding Contacts**

[safeguarding@wrexhamafc.co.uk](mailto:safeguarding@wrexhamafc.co.uk)

### **Club contacts**

Senior Safeguarding Manager

**Humphrey Ker** [safeguarding@wrexhamafc.co.uk](mailto:safeguarding@wrexhamafc.co.uk)

Safeguarding, Welfare and EDI Lead

**Llinos Preece** [safeguarding@wrexhamafc.co.uk](mailto:safeguarding@wrexhamafc.co.uk)

07852510910

Head of Operations

**Julie Greenwood** [Julie.greenwood@wrexhamafc.co.uk](mailto:Julie.greenwood@wrexhamafc.co.uk)

Academy Secretary, Safeguarding and Welfare

**Zoe Denman-Ellis** [Zoe.denman-ellis@wrexhamafc.co.uk](mailto:Zoe.denman-ellis@wrexhamafc.co.uk)

Head of Women's Football Operations

**Gemma Owen** [gemma.owen@wrexhamafc.co.uk](mailto:gemma.owen@wrexhamafc.co.uk)

Head of Wrexham Community Trust

**Steve Dale** [steven.dale@wrexhamafc.co.uk](mailto:steven.dale@wrexhamafc.co.uk)

### **Other Safeguarding Contacts in Football**

The English Football League (EFL) Safeguarding Team

Tel: 01772 325940

Email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

The FA Safeguarding Team

Tel: 0800 169 1863

Email: [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)



**If you are worried about your IMMEDIATE safety or the IMMEDIATE safety of another child or adult at risk, call the Police using 999**

**Other External Key Contacts:**

**NSPCC 24-hour Helpline – 0808 800 5000**

**NSPCC Childline – 0800 1111**

**North Wales Police – 101 (Non-emergency Number)**

**Wrexham County Borough Council Childrens' Services 01978 292039  
(office hours)**

**Wrexham County Borough Council Adult Services 01978 291100  
(office hours)**

**Emergency Out of Hours Duty Team 03450 533 116**