

TOTTENHAM HOTSPUR

SAFEGUARDING

SAFEGUARDING ADULTS POLICY AND PROCEDURE

FEBRUARY 2019
NEXT REVIEW: MAY 2019



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("Tottenham Hotspur")

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SAFEGUARDING ADULTS POLICY AND PROCEDURE

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SAFEGUARDING ADULTS

POLICY STATEMENT



FOREWORD

The Safeguarding Adults Policy reflects the safeguarding ethos of the Club. The Board of Directors endorses this document as part of the Club's constitution and we expect all staff in the workforce community at Tottenham Hotspur to share our commitment to safeguarding and promoting the welfare of adults at risk.

The Club's Safeguarding Children Policy and Safeguarding Adults Policy are linked to ensure the safety of vulnerable groups.

Matthew Collecott

Operations and Finance Director
on behalf of the Board of Directors
of Tottenham Hotspur Football & Athletic Co. Ltd.

Tottenham Hotspur is committed safeguarding children (under 18s) and adults at risk.

Tottenham Hotspur is committed to creating opportunities for adults at risk to participate in a broad spectrum of activities at the Club. The Club has an ethical, legal and social responsibility to provide a safe environment for all those participating in these activities.

All children and adults at risk are entitled to protection from harm and have the right to take part in Club activities in a safe environment. Tottenham Hotspur has a duty of care to safeguard all children and adults at risk involved from harm. All children, adults at risk and others who may be particularly vulnerable must be taken into account.

Adult safeguarding is defined as '*protecting an adult's right to live in safety, free from abuse and neglect*' (Care and Support statutory guidance, chapter 14ii. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

The safety and protection of adults at risk will be created through safe working practices, safeguarding procedures and systems, including an effective safe recruitment procedure along with arrangements for responding to allegations of abuse and working under the guidance of the Local Safeguarding Adults Board.

The term "at risk" is interchangeable with "vulnerable". A vulnerable or at-risk adult is a person who, by reason of a learning or physical impairment or illness, has a reduction in physical or mental capacity **and** may have a limited ability to cope with adverse situations.

Safeguarding children and adults at risk

Safeguarding policies and procedures apply to children and adults at risk:

- Child: a person who has not reached their 18th birthday.
- Adult at Risk: Someone aged 18 or over:
 - o who may need care services because of age, disability or illness;
 - o who may not be able to protect himself or herself from harm.

Tottenham Hotspur recognises that it is not appropriate to operate combined policies regarding the safeguarding of children and of vulnerable adults, due to the differences in legal and statutory requirements. Therefore, the information in this document only applies to the safeguarding of adults at risk. However, children and adults policies are interlinked to ensure the safety of vulnerable groups. Tottenham Hotspur's Safeguarding and Child Protection Policy can be accessed on the Club website.

Safeguarding information is available to all. The Club's policy and complaint/feedback mechanisms will be promoted to parents, care-givers, organisations and other stakeholders who have an interest in safeguarding adults at the Club.

Equality

All adults at risk have a right to be safe and to be treated with dignity and respect, with a right to privacy. All adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse, whether such abuse be physical, sexual, psychological, financial/material, domestic abuse, modern slavery, discriminatory, organisational, neglect/acts of omission or self-neglect. The needs of disabled people and others who may be particularly vulnerable are taken into account.



Policy Aim

This policy aims to ensure that safeguards are put in place to keep adults at risk safe and to prevent harm from occurring when participating in activities. Safeguarding adults at risk is an important responsibility for Tottenham Hotspur in order to help encourage wider participation and inclusion in its activities.

The policy and procedures will take effect from May 2016, and will be formally reviewed in September 2017, or in light of significant organisational change or legislation, or in the event of a serious incident. This work will be led by the Head of Safeguarding & Welfare who is the safeguarding lead for children and adults at Tottenham Hotspur.

Safeguarding Adults Lead

The Safeguarding Lead for children and adults at Tottenham Hotspur is the Head of Safeguarding & Welfare, who is responsible for safeguarding procedures, and referring and liaising with agencies, such as Social Care departments and the police about safeguarding issues. The deputy is the Operational Support Manager.

For contact information, see Appendix 1 – 'Contacts'.

Principles

- the welfare and safety of adults at risk is of primary concern
- everyone has the right to be treated as an individual
- all adults at risk have a right to be safe and to be treated with dignity and respect, with a right to privacy
- all adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse
- all incidents of suspected poor practice and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- confidentiality should be upheld in line with the and the Freedom of Information Act (2004) Data Protection Act 2018 GDPR
- this policy will be promoted to all staff and volunteers, partners and customers, and will be available on the Tottenham Hotspur website.
- all Tottenham Hotspur staff, volunteers and partner organisations have a role to play in ensuring that safeguarding responsibilities and commitments are upheld and at the forefront of everything they do.

This policy applies to the activities of all personnel employed by Tottenham Hotspur or Tottenham Hotspur Foundation, including staff from agencies, contractors, volunteers and other workers.

Responsibilities

Tottenham Hotspur will:

- accept the moral and legal responsibility to comply with the duty of care to protect and safeguard the welfare of adults at risk engaged in any activity over which it has supervision and control;
- emphasise that **everyone has a shared responsibility** to ensure the safety of adults at risk;
- respect and promote the rights, wishes and feelings of adults at risk;
- promote an organisational culture that ensures that all adults at risk, employees, service users and carers are listened to and respected as individuals and feel they can raise their concerns and know that they will be listened to, without worrying that something bad will happen as a result;
- undertake recruitment procedures that take account of the need to protect adults at risk and include arrangements for appropriate checks on new staff and volunteers;
- train and supervise its employees and volunteers to adopt best practice to safeguard and protect adults at risk from abuse, and reduce the likelihood of allegations of abuse against themselves;
- require all staff and volunteers to adopt and abide by this policy and the Code of Ethics and Conduct;
- seek to ensure that Club activities are inclusive and provide a positive experience for all;
- ensure that parents, adults at risk, staff and volunteers are provided with information about this policy;
- ensure that parents, adults at risk, staff and volunteers are provided with feedback mechanism to voice their concerns or lodge complaints;
- maintain confidentiality and ensure information is shared as appropriate with other agencies in all cases involving safeguarding, in line with current legislation
- respond to any allegations and concerns appropriately and implement the appropriate disciplinary and appeals procedures;
- continually seek ways to improve the safety and wellbeing of all adults at risk on activities at Tottenham Hotspur;
- commit to and lead on the continuous development, monitoring and review of this policy and the procedures outlined within it.



The term: **adult/adult at risk/vulnerable adult**

These terms are used interchangeably and, for the purpose of this policy, refer to someone aged 18 or over who is vulnerable to abuse. From 25 June 2018, the Premier League Rules defined a Vulnerable Adult as:

1. A.1.6. **“Adult at Risk”** means an adult who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or is at risk of, abuse or neglect and as a result of those care and support needs is unable to protect himself from either the risk of, or the experience of abuse or neglect. This may include (but is not limited to) people with learning disabilities, sensory impairments, mental health needs, elderly 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; means an adult 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 or herself, or unable to protect himself against significant harm or exploitation;

This amendment is intended to align with The FA's new definition of the term, which they have introduced to reflect guidance from the Information Commissioner.

Sporting Activities for Adults

Injury resulting from abuse differs from that which occurs in the context of sport because most sports injuries are accidental or the result of momentary lack of care.

Tottenham Hotspur takes all reasonable steps to ensure that adults at risk engaged in its activities do so in a safe environment and are safeguarded from abuse.

1. POLICY AND PRINCIPLES

This policy is available on the Club website for external stakeholders and on the Club intranet for staff.

Our core safeguarding principles are:

- The Club's responsibility to safeguard and promote the welfare of all children, young and vulnerable people is of paramount importance.
- Safeguarding is everyone's responsibility.
- Adults at risk should feel safe on our activities.
- Policies will be reviewed regularly: at least once a year unless an incident or new legislation or guidance suggests the need for an interim review.

1.1 Safeguarding statement

Tottenham Hotspur (the Club) recognises its moral and legal responsibility to safeguard and promote the welfare of adults at risk.

The Club will endeavour to provide a safe and welcoming environment where adults at risk are respected and valued.

Club staff are alert to the signs of abuse and neglect and follow reporting procedures to ensure that adults receive effective protection.

The procedures contained in this policy apply to all staff and are consistent with those of Haringey Safeguarding Adults Board and London Multi-Agency Adult Safeguarding Policy and Procedures.

1.2 Policy principles

- The welfare of the adult is paramount.
- All adults, regardless of gender, race, age, ethnicity, ability, sexual orientation, and religious or political beliefs, have equal rights to protection.
- All adults have the right to participate, enjoy and develop through sport, in a safe and inclusive environment, free from all forms of abuse, violence, neglect and exploitation.
- All staff have a role in the identification of need as well as risk of harm.
- All staff have a responsibility to act on any suspicion or disclosure that an adult is at risk of harm.

1.3 Policy aims

- To provide all staff with information to enable them to meet their adult protection responsibilities.
- To ensure good practice.
- To demonstrate the Club's commitment to safeguarding to adults at risk and other partners.



2. PURPOSE

The purpose of this policy is to ensure that staff are aware of the needs of 'adults at risk' and that they receive training and guidance in the recognition of abuse. It provides guidance on how to report any concerns or allegations of abuse.

2.1 Aims of Safeguarding

The following safeguarding principles provide a basis to achieve good outcomes for adults at risk:

- **Empowerment:** Being person led - people being supported and encouraged to make their own decisions and informed consent (make safeguarding personal).
- **Prevention:** It is better to take action before harm occurs – prevention of neglect, harm and abuse is the primary objective.
- **Proportionality:** The least intrusive response appropriate to the risk presented.
- **Protection:** Support and representation for those in greatest need.
- **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability:** Accountability and transparency in delivering safeguarding.

2.2 Early Interventions

To prevent abuse, early intervention can offer help and intervention at a lower level of concern and improve the outcomes for children or adults at risk.

2.3 Multi-agency Approach

People and agencies must work together to safeguard children and adults at risk so that abuse is stopped and prevented in the future. Children and adults at risk are often known to a number of services and it is important that information is shared.

Multi-agency working:

- increases awareness;
- ensures a co-ordinated response;
- promotes early intervention and prevention.

The outcomes for children or adults at risk are better when individuals and organisations take their safeguarding responsibilities seriously and work in close cooperation with other colleagues and agencies.

Haringey's Local Safeguarding Children Board (LSCB) and Safeguarding Adults Board (SAB) are responsible for making sure that agencies work together.

2.4 Responsibility of Policy

Tottenham Hotspur is committed to being inclusive and providing a safe environment for those involved in its activities.

The responsibility taken by this Policy is to:

- Safeguard the welfare of adults at risk at Tottenham Hotspur by protecting them from any significant physical, sexual and emotional harm and from neglect, bullying and financial harm within the Club.
- Ensure staff working with adults at risk are aware of the Safeguarding Adults Policy, are trained and know how to recognise abuse and how to report and respond to it.
- Report to the appropriate authority any concerns about abuse or harm to adults at risk whether this occurs within the Club or elsewhere.
- Ensure appropriate investigations and responses to concerns about abuse or harm within Tottenham Hotspur, utilising the disciplinary process as appropriate.
- Report when appropriate to the Disclosure and Barring Service (DBS) anybody delivering a regulated activity for Tottenham Hotspur who is believed by the Club to present a risk of harm to adults at risk. Where the Club "withdraws permission" for a person to deliver a regulated activity they will also be reported to the DBS.

2.5 Review

This policy will be constantly reviewed and revised to improve this response further. As a minimum, this will take place once a year. Any change in legislation will be deemed to be incorporated in these procedures.



3. ROLES AND RESPONSIBILITIES

3.1 Tottenham Hotspur

Tottenham Hotspur believes that adults at risk have the right to participate in Club activities in a safe environment.

We take all reasonably practicable steps to reduce the risk of harm to adults at risk involved in Club activities and discharge our moral and legal responsibility to protect them,

3.2 The Head of Safeguarding & Welfare

As the safeguarding lead, the Head of Safeguarding & Welfare has overall responsibility for safeguarding provision across the Club, including case management and the development and monitoring of the policy and procedures.

3.3 The Deputy for the Head of Safeguarding & Welfare

The Deputy is appropriately trained and, in the absence of the Head of Safeguarding & Welfare, carries out those functions necessary to ensure the ongoing safety and protection of adults at risk

3.4 The Safeguarding Officer

The Safeguarding Officer supports the Club's safeguarding policy, procedures and systems, and acts as a first point of contact for safeguarding matters for a specific department within the Club and will forward concerns to the Head of Safeguarding & Welfare.

3.5 The Head of Department and Senior Staff

Special responsibilities for safeguarding policy, procedures and systems fall on management and those involved in the recruitment, selection and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment and safe working practices in their day-to-day operation within their departments and projects.

3.6 Staff

The Club's Code of Ethics and Conduct states that '**Tottenham Hotspur is committed to safeguarding children and adults at risk**' and the Club expects all staff and volunteers (also referred to as "personnel") at every level to share this commitment as part of their duties.

- All staff have a responsibility to provide a **safe environment for adults at risk**.
- All staff have a responsibility to **identify adults** who may be in need of **extra help** or who are suffering, or are likely to suffer, **harm**.
- All staff then have a responsibility to take appropriate action and **report concerns**.
- All staff should respect and abide the Club's **Code of Ethics and Conduct**.
- All staff members should **work with the designated safeguarding lead**, the Head of Safeguarding, to deal with concerns.

For a list of designated safeguarding personnel at Tottenham Hotspur (the Head of Safeguarding & Welfare and Safeguarding Officers) and external contacts, see 'Contacts' in Appendix 1.



4. GOOD PRACTICE AND STAFF CONDUCT

To meet and maintain our responsibilities towards adults at risk we need to agree standards of good practice which form a code of conduct for all staff.

Good practice and staff conduct includes:

- treating all adults with respect.
- setting a good example by conducting ourselves appropriately.
- involving adults in decisions that affect them.
- encouraging positive, respectful and safe behaviour among adults.
- being a good listener.
- being alert to changes in an adult's behaviour and to signs of abuse, neglect and exploitation.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the Club's safeguarding adults policy, safe working practice and guidance documents on wider safeguarding issues, for example bullying, physical contact, modern slavery, radicalisation and extremism, e-safety and information-sharing.
- asking an adult's permission before initiating physical contact, such as physical support during a sporting activity or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between adults and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some adults lead to an increased risk of abuse.
- working in an open environment and within sight or hearing of others.
- reporting concerns about an adult's safety and welfare.
- following the Club's policy with regard to relationships with participants (service users) and communication with participants, including social media.

4.1 Staff/Adult Relationships

The Club provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with participants. Staff found to be in breach of these rules or the Code of Ethics and Conduct may be subject to disciplinary action or an investigation.

- Staff should ensure they maintain healthy, positive and professional relationships with all children (under 18s) and adults at risk.
- Staff working with adults and their managers are in a position of trust.
- Club personnel must not engage in sexual relationships with them while that unequal power relationship exists.
- The Club disapproves of relationships between personnel and participants for whom they have previously been responsible.

4.1.1 Abuse of position of trust

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

The Club's Code of Ethics and Conduct sets out this expectation.

4.2 Helping adults at risk to keep themselves safe

Adults at risk will be expected to comply with a code of conduct and this expectation will be made clear at the start of the activity by a member of staff.

Adults at risk will be encouraged to conduct themselves and behave in a responsible manner.

The Club participates in various campaigns (such as Anti-Bullying Week and Safer Internet Day) and will promote an ethos of respect for adults at risk, and they may speak to a member of staff of their choosing about any worries they may have.



4.3 Support for those involved in an adult protection issue

Abuse is devastating for the adult and can also result in distress and anxiety for staff who become involved.

We will support adults at risk and staff by:

- taking all suspicions and disclosures seriously.
- nominating a link person who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation, separate link people will be nominated to avoid any conflict of interest.
- responding sympathetically to any request from adults at risk or staff for time out to deal with distress or anxiety.
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- storing records securely.
- offering details of helplines or other avenues of external support
- following the procedures laid down in our safeguarding adults policy, whistleblowing, complaints and disciplinary procedures.
- co-operating with relevant statutory agencies.

4.4 Complaints procedure

Our complaints procedure will be followed where an adult at risk raises a concern about poor practice that initially does not reach the threshold for adult protection action (referral).

Poor practice examples include unfairly singling out someone or attempting to humiliate them, bullying or belittling someone or discriminating against them in some way.

- Formal complaints are managed by senior staff.
- Complaint and feedback mechanisms should be promoted on all activities.
- Complaints from staff are dealt with under the Club's complaints and disciplinary and grievance procedures.
- Complaints which escalate into an adult protection concern will be managed under the Club's safeguarding adults policy.

4.5 Recruitment and selection of staff

Tottenham Hotspur is committed to safer recruitment policies and practices for paid staff and volunteers. This includes enhanced Disclosures and Barring Service (DBS) checks for staff and volunteers, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff and volunteers.

4.6 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.

New staff will receive a briefing during their induction by their line manager, which includes the Club's safeguarding policy and Code of Ethics and Conduct, safe working practices, reporting and recording arrangements, and details for their Safeguarding Officer(s) and the Head of Safeguarding & Welfare.

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

- the Club's **Safeguarding Adult Policy**;
- **Safe Working Practice**;
- the Club's **Code of Ethics and Conduct** and
- the designated **safeguarding lead** (the Head of Safeguarding & Welfare) and the team of Safeguarding Officers.

All staff members should also receive appropriate adult safeguarding information which is regularly updated – the minimum being.

For staff working with adults in Regulated Activity:

- A Safeguarding Adult Workshop every three years.

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

- appropriate safeguarding information and/or training (such as Haringey Council's e-learning every three years);

For all other staff, including those in a position of responsibility:

- Safeguarding awareness through activities and communications, such as email.



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

4.6.1 New Staff

All new members of staff will undergo an induction that includes familiarisation with the Club's safeguarding ethos, Safeguarding Information, Code of Ethics and Conduct and safe working practices on their activities, as well as identification of their training needs.

4.6.2 Safeguarding Lead and Deputy

The Head of Safeguarding & Welfare and the Deputy undertakes safeguarding lead training every two years.

4.6.3 Supply staff and other visiting staff working with adults

Workers in this group will be given a "Safeguarding for Visitors" booklet or a code of conduct for their role. All staff will be made aware of the increased vulnerability and risk of abuse of certain groups, including disabled adults and adults with learning impairments and communication difficulties and transitions (leaving the care system).

Visitors with a professional role, such as social workers 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.



5. SAFEGUARDING LEGISLATION AND GUIDANCE

Safeguarding at Tottenham Hotspur is influenced by a range of legislation and guidance: The Care Act 2014 is the most significant piece of legislation since the establishment of the welfare state. The Act gives more responsibility to local authorities to promote wellbeing. As a result, the Care Act has widened the scope of safeguarding.

Safeguarding is everyone's responsibility. This responsibility is outlined in a number of pieces of legislation, guidance and policy and procedures.

	Children (under 18s)	Adults at Risk
Legislation	Care Act 2014 Children Act 1989/2004 Children and Family Act 2014	Care Act 2014 Mental Capacity Act 2005
Counter Terrorism 2015		
Statutory Guidance	Working Together to Safeguard Children 2018 (Department for Education)	Care and Support statutory guidance, March 2017 (Department of Health) <i>To support implementation of part 1 of the Care Act 2014 by local authorities</i>
Prevent Duty Guidance 2015 (Home Office): Preventing people becoming terrorists or supporting terrorism, require challenging extremist ideas that legitimise terrorism.		
Policy and Procedures	Haringey Local Safeguarding Children Board (LSCB) policies and procedures	Haringey Safeguarding Adults Board (LSAB) policies and procedures
London Multi-Agency Adult Safeguarding Policy and Procedures		

Tottenham Hotspur has produced guidance on safeguarding children and adults at risk. It says what all employees or volunteers must do if they have a concern about a child or adult at risk being harmed.

Due to their contact with adults at risk, staff at Tottenham Hotspur are well placed to observe changes in an adult's behaviour and the outward signs of abuse.

Adults at risk may also turn to a trusted adult at the Club when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse and understand the procedures for reporting their concerns so that the Club can take appropriate action.

5.1 Related Tottenham Hotspur policies

This policy is one of a series in the Club's safeguarding portfolio.

- Safeguarding Strategy
- Safe Working Practice (including physical contact, E-safety: hand held devices/staff-participant online communication, missing person)
- Complaints procedure
- Whistleblowing Policy (the Shelf)
- Safer Recruitment (recruitment and selection of staff working with children and adults at risk)
- Managing Allegations Policy
- Grievance Policy and Disciplinary Policy (The Shelf)

Other documents:

- Concern form
- Tottenham Hotspur Safeguarding Structure
- Workforce Development Plan
- Education and Training Matrix



6. SAFEGUARDING AND PROMOTING WELFARE

Safeguarding is both proactive and reactive – it means:

- promoting welfare and
- protecting from harm.

Unfortunately, the abuse of children and adults happens every day. It can happen anywhere and be perpetrated by anyone.

Abuse is not acceptable. Often people do not realise they are the victim of abuse or are unable to protect themselves from harm. This is why it is important that other people take action and know what to do.

Vulnerable groups – children and adults at risk – regularly access a range of activities, including:

- Tottenham Hotspur Academy activities;
- Tottenham Hotspur Foundation activities;
- Global Football Development (Global) activities;
- Tottenham Hotspur matchday activities.

Staff across these activities can make a difference. Safeguarding is not just the responsibility of people who are working directly with children or adults at risk.

Safeguarding is everyone's business – including all staff, workers or contractors delivering services on behalf of the Club. However, staff responsibilities will vary according to their role which may be: practitioner working with children or adults, manager of children's or adult activities, safeguarding officer, safeguarding lead, head of department or director.

Safeguarding will mean different things to different people:

- Making sure children and adults at risk are safe and healthy.
- Looking after or supervising people who are vulnerable.
- Preventing abuse and neglect from happening.
- Being aware of signs of abuse or neglect and reporting concerns.
- Protecting people from harm.

All staff have a role in the identification of need as well as risk of harm.



7. ADULT ABUSE

7.1 Where abuse may occur

Abuse can take place in any context and can occur anywhere, including where the person lives, in someone else's house, nursing or care home, hospital, workplace, in a custodial situation, public places and other places assumed as being safe.

Harm may occur anywhere in a Tottenham Hotspur activity or it can be reported to a Club representative (or indicative signs noticed) when it has occurred outside a Club activity.

7.2 Who can the abuser be?

Adults at risk may be abused by a wide range of people including:

- A family member, parent, child, spouse other relative
- Friend, neighbour or associate
- Professional member of staff, health worker, social carer or other worker
- Paid or volunteer carer
- Visitor
- Another adult at risk
- People who deliberately exploit vulnerable people
- Strangers

Abuse exists in various forms and can be perpetrated by one or more people.

7.1 How can you tell if someone is being abused?

Some people may not realise they are being abused. Often the person being harmed is not able to say what is happening to them. Here are some **warning signs**:

- Bruises, falls and injuries
- Signs of neglect such as clothes being dirty
- Poor care either at home or in a residential or nursing home or hospital
- Changes in someone's financial situation
- Changes in behaviour such as loss of confidence or nervousness
- Isolation
- Being withdrawn

Most people find it difficult to imagine that vulnerable adults and older people are victims of abuse. It is a hidden and often ignored problem in society.

7.2 Who is at risk and why

The Haringey Safeguarding Adult Board Annual Report 2014-2015 provided details of the safeguarding adults referrals received for that period.

Referrals are increasing every year as people become more aware of adult safeguarding and how to report concerns. The most common types of abuse were neglect and acts of omission with the majority of abuse happening in a person's own home.

7.3 Abuse on social media

Abuse can also occur through social media and this is often harder to detect. It is important to remember that the type of abuse that can occur through social media always includes emotional and psychological abuse and can include sexual and financial abuse. Social media includes (but is not limited to): networking sites such as Facebook, Twitter and LinkedIn, email, text messages, Skype and instant messaging services.

Some examples of abuse that can occur through social media include:

- Unwanted sexual text messages (sexual abuse)
- Unwanted communication or stalking/harassment (emotional abuse)
- Inappropriate messaging; with kisses attached (emotional and sexual abuse)
- Requests for money (financial abuse)
- Intimidation (emotional abuse) or Cyber-bullying (emotional abuse)
- Sexual coercion (sexual abuse)

It is not the responsibility of staff to decide that abuse of an adult at risk is occurring but it is their responsibility to act on any concerns.

7.4 What is Abuse?

Abuse is about the misuse of the power and control one person has over another. In determining whether or not abuse has taken place, it is important to remember that intent is not the issue. The definition of abuse is based not on whether the person intended harm to be caused but rather on whether harm was caused, and on the impact of the harm (or risk of harm) on the individual.

Incidents of abuse may be one-off or multiple acts, eg: physical abuse at the same time as financial exploitation or psychological abuse and effect one person or more.

People causing abuse may be relatives, carers, staff or workers from another organisation, volunteers, visitors, celebrities or anyone with the opportunity to carry out abuse.

Abuse is an action or a lack of action on the part of another person that causes harm. Abuse can be:

- intentional or unintentional;
- is not always a criminal offence;
- is a violation of a person's human and civil rights.

7.4.1 Types of abuse: The Care Act (2014) provides definitions of types of abuse:

- **Physical:** including: assault, hitting, slapping, pushing, misuse of medication (such as over medication), restraint or inappropriate physical sanctions.
- **Domestic violence:** can take the form of: physical, psychological, coercive or controlling behaviour, sexual, financial or emotional forms, and so called 'honour' based violence.
- **Sexual:** including rape, sexual exploitation, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, "sexting" and revenge porn (taking and sharing sexual images of the individual without consent or they have been coerced into), subjection to pornography or witnessing sexual acts without consent or being pressurised into doing so, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological:** including emotional abuse: treats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, bullying or cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Coercive control - controlling or observing victim's daily activities, including being made to account for their time; restricting access to money; restricting their movements, isolating the victim from family/friends; intercepting messages or phone calls.
- **Financial/material:** is the unauthorised use or theft of a vulnerable adult's money or property. It can include: theft, fraud, and exploitation. It may be pressure in connection with wills, property, inheritance or financial transactions. It can involve the misuse or misappropriation of property, possessions or benefits. It may include depriving a person access to their money, property or assets.
- **Modern slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory:** discriminatory abuse is an act or act of omission based on discrimination because of a vulnerable adult's race, culture, belief, gender, age, disability or sexual orientation which causes harm.
It may include: not providing a service or an appropriate service, not providing meals suitable for religious or cultural needs, not providing appropriate aids or adaptations, verbal abuse, taunts, bullying or degrading treatment. It may constitute **hate crime**.
- **Organisational:** including neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Neglect/acts of omission:** including ignoring medical, emotional or physical care needs; Failure to provide access to appropriate health, care and support or educational services; The withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect:** this covers a wide range of behaviour; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.



7.5 Related issues:

Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - most often by a third party, who has their own agenda. This is an example of **exploitation** - using a vulnerable person to further an individual or group's political views. The vulnerable person may be asked to carry out criminal acts on behalf of another.

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. Also included in this definition of extremism: calls for the death of members of armed forces, whether in this country or overseas.

Hate Crimes

Hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person's:

- disability
- race or ethnicity
- religion or belief
- sexual orientation
- transgender identity.

This can be committed against a person or property.

A victim does not have to be a member of the group at which the hostility is targeted. In fact, anyone could be a victim of a hate crime.

Hate crimes and incidents hurt; they can be confusing and frightening.

Violence against Women and Girls

Violence against women and girls covers all types of abuse; women and girls are disproportionately victims of forms of abuse and crimes. Men and boys are overwhelmingly represented as perpetrators of violence against women and girls, but can also be victims of some forms of violence.

Abuse by another adult at risk: Where the person causing the harm is also an adult at risk, the safety of the person who may have been abused is paramount.

Allegations against carers who are relatives or friends: There is not ways a clear difference between unintentional harm caused inadvertently by a carer and a deliberate act of either harm or omission, in which case the same principles and responsibilities for reporting apply.

Abuse of trust: A relationship of trust is one in which one person is in a position of *power or influence* over the other person because of their work or the nature of their activity. There is a particular concern when abuse is caused by the actions or omissions of someone who is in a position of power or authority.

Abuse by children (under 18s): If a child or children is/are causing harm to an adult at risk, this should be dealt with under the Safeguarding Adults policy and procedures, but will also need to involve the local authority children's services.

Transitions (care leavers): The Club will ascertain whether robust joint working arrangements between children's and adult services have been put in place to ensure that the needs of children leaving care are addressed as they move to adulthood and become or continue to be involved in Club activities.

Mental Capacity

Mental capacity refers to whether someone has the mental capacity to make a decision or not. There is a presumption that adults have mental capacity to make informed decisions about their lives. If someone has been assessed as not having mental capacity, decisions will be made in their best interests as set out in the Mental Capacity Act 2005 and Mental Capacity Act *Code of Practice*.

Deprivation of Liberty Safeguards (DoLS)

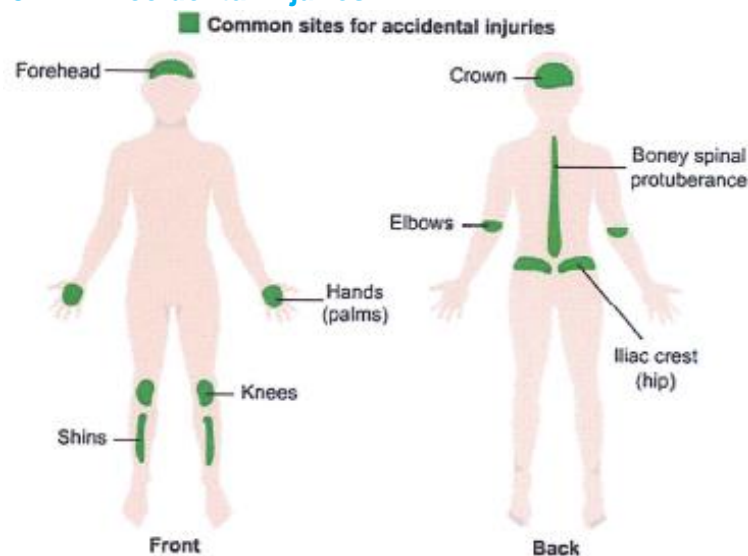
The **Deprivation of Liberty Safeguards** is the procedure prescribed in law when it is necessary to deprive of their **liberty** a resident or patient who lacks capacity to consent to their care and treatment in order to keep them safe from harm. A DoLS authorisation must be in place if a person without capacity is being deprived of his liberty. Haringey Council is the local DOLS supervisory body.,

8. SIGNS AND INDICATORS

In your role you may come across vulnerable people you think are at risk of harm:

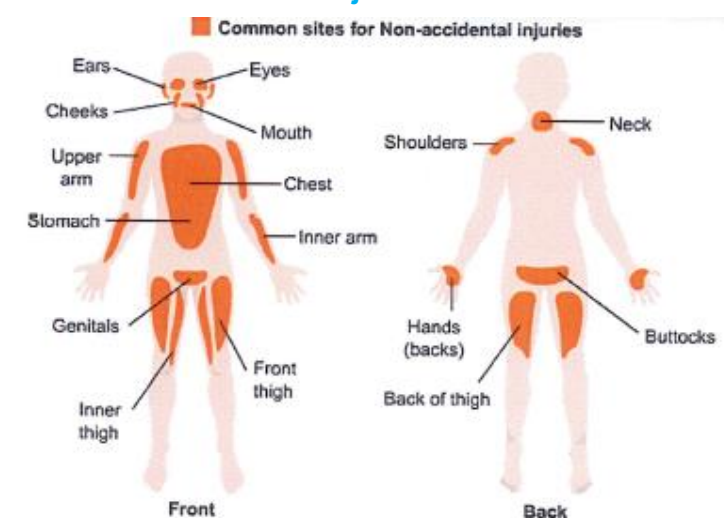
- An adult at risk may behave in certain ways which indicate abuse is occurring
- Abuse is not always easy to spot as there may be other reasons why an individual is acting in a particular way
- There are also material and physical signs to look out for which may indicate abuse
- Everyone has a responsibility to safeguard children or adults at risk
- Abuse is often hidden - often it isn't witnessed or disclosed.
- Signs and indicators are subtle clues that may suggest a person has been the victim of abuse or neglect, even if you haven't witnessed it or been told about it.
- It may be something you notice about the person who you are worried about, or a relationship they have with someone else, it could be something you notice about their house or where they are living.

8.1 Accidental Injuries



This diagram shows relatively common sites to find bruising due to accidental causes.

8.2 Non-accidental injuries



This diagram shows relatively common sites to find bruising due to non-accidental causes, and therefore may cause concern.



9. WHAT IS A SAFEGUARDING ADULT CONCERN?

An adult safeguarding concern is:

- any allegation about an adult who has or appears to have care and support needs that they may be subject to, or
- who may be at risk of abuse and neglect and may be unable to protect themselves against this.

A concern may be raised by anyone, and can be:

- An active disclosure of abuse by the adult, where the adult tells a member of staff that they are experiencing abuse and/or neglect
- An observation of abuse where someone has noticed signs of abuse or neglect, for example clinical staff who notice unexplained injuries
- An allegation of abuse by a third party, for example a family/friend or neighbour who have observed abuse or neglect or have been told of it by the adult
- A complaint or concern raised by an adult or a third party who doesn't perceive that it is abuse or neglect.
- A concern raised by staff or volunteers, others using the service, a carer or a member of the public; An observation of the behaviour of the adult at risk
- An observation of the behaviour of another
- Patterns of concerns or risks that emerge through reviews, audits, complaints or visits.

9.1 Capacity, Consent and Decision Making

The consideration of capacity is crucial at all stages of Safeguarding Adults procedures. For example, determining the ability of an adult at risk to make lifestyle choices, such as:

- choosing to remain in a situation where they risk abuse
- whether a particular act or transaction is abusive or consensual: or
- how much an adult at risk can be involved in making decisions in a given situation.

All adults are deemed to have capacity unless there has been a formal capacity assessment to indicate otherwise in line with Mental Capacity Act 2005.

9.1.1 Situations Where the Adult Does Have Capacity

If it is decided that a person does have capacity and has taken an informed choice to live in a situation that puts them at risk, then the person, their carer, their community support and any other relevant agency or individual should be consulted in order to ensure that the person is offered all possible choices. He or she may still choose to stay in the situation and live with that risk.

Staff will need to determine whether the adult at risk is making the decision of their own free will or whether they are being subjected to coercion or intimidation. If it is believed that the adult is exposed to intimidation or coercion, efforts should be made to offer the adult 'distance' from the situation in order to facilitate decision making. If others (children or adults) are at risk of harm or if a criminal offence has been committed, staff must take action and follow the reporting procedure.

9.1.2 Situations Where the Adult Does Not Have Capacity

If it is decided that the adult at risk does not have capacity then staff should act in the best interests of the person, and do what is necessary to promote health or wellbeing or prevent deterioration.

9.1.3 Advocacy (Independent Mental Capacity Advocates)

IMCAs must be instructed to represent people where there is no one independent of services, such as a family member or friend, who is able to represent the person, but may also be instructed in other circumstances. They advocate for people where appropriate, especially where there are potential issues relating to capacity and consent.

9.2 To summarise

- Act to protect the adult and take steps to ensure that the adult is in no immediate danger.
- If possible, make sure that other service users are not at risk.
- Seek the views/wishes of the adult at risk and what outcomes he wants to achieve.
- Seek consent to share information.
- Make notes or record on your mobile phone, if you have one.
- Report the abuse to your line manager or, in his absence, to your Safeguarding Officer or Head of Safeguarding & Welfare.
- Record the event – use the Concern Form.

10. REPORTING PROCEDURE

The primary responsibility of the Club is to ensure:

- concerns and any relevant information about possible abuse are passed to police or adult social care without delay.
- the safety and wellbeing of the adult at risk whilst under its supervision.

If you SEE IT, HEAR IT, SUSPECT IT – REPORT IT.

10.1 Role of Staff

All personnel and volunteers have a *duty to act* in a timely manner on any concern or suspicion that an adult who is vulnerable is, or is at risk of, being abused, neglected or exploited and to ensure that the situation is assessed and investigated.

Staff are in the frontline of preventing harm or abuse occurring and empowering the person at risk to take action where concerns arise.

It is not the responsibility of staff to interview or investigate.

10.2 Actions for Staff

- **Step 1 - In an emergency, ring 999**
If you think that the person, yourself or anyone else is in danger or needs urgent medical attention, ring **999**.
- **Step 2 - Keep people safe**
Keep you, the child or adult at risk and other people safe.
- **Step 3 - If you think a crime has happened, or is happening, phone the Police**
To report a crime, ring the non-emergency contact number **101**.
- **Step 4 - Tell your line manager**
Report your worries to your line manager who is responsible for making a decision about what to do next.
If your manager is not available; or you don't feel able to go to your manager; or you are worried your manager may be a part of the abuse, you can:
 - tell your line manager's manager, safeguarding officer or Head of Safeguarding & Welfare; OR
 - when Club officials are not available, contact social care services (see Contacts).

10.3 Record

Make a record (use Concern Form to guide) and forward to your Safeguarding Officer or the Head of Safeguarding & Welfare.

10.4 Follow procedure

Follow procedure and any **advice** you are given by the Safeguarding Officer, Head of Safeguarding & Welfare or any helpline contacted and maintain a record of this.

- Don't take any individual action or response outside this procedure.
- Ensure **confidentiality** – do not mention to other people.
- Seek support for yourself – speak to your line manager, Safeguarding Officer or Head of Safeguarding & Welfare.

Once the allegation or suspicion of abuse has been reported to the Adults Safeguarding Officer, he/she will discuss with the Head of Safeguarding & Welfare.

10.5 Radicalisation: actions for staff suspecting vulnerability to radicalisation

In line with Prevent Duty, where there are concerns that behaviour or views give concern that the individual is vulnerable/susceptible to being led into extremist activities and there is no immediate risk of them initiating a violent extremist attack, the staff should follow the reporting procedure, as the Head of Safeguarding & Welfare (Safeguarding Lead) is also the Prevent Lead.

If there are concerns about an immediate or possible risk of them initiating a violent extremist attack, the Police should be notified immediately.



10.6 Disclosure by an adult at risk

If an adult experiencing abuse or neglect speaks to you about this, follow procedure.

- Stay calm: don't look horrified or shocked even though this might be how you are feeling.
- Be sympathetic and understanding: they did the right thing in telling and you are taking the information seriously.
- Reassure the person: tell them it is not their fault. **Ask the person what they would like to happen** – this is part of making safeguarding personal.
- **Ask for consent*** to share the information with others and take action.
"What you are saying is important, so I need to talk to someone about it"
It is essential that you consider if the adult at risk has the capacity to give informed consent.
* An adult's legal right to consent to the sharing of his personal data marks the fundamental difference between approaches in safeguarding adults and safeguarding children.
- **Tell the person** what you will do next and with whom the information will be shared (e.g. Line Manager, Safeguarding Officer, Head of Safeguarding & Welfare).
"I'm going write down what you've just told me and speak with".
- **Make a record:** Records should note clear observations of fact.
 - Be precise about what happened and what you were told.
 - It is important they are written at the time and not with hindsight.

If the individual has specific communication needs, provide support and information in a way that is most appropriate.

- **Do not** give promises of complete confidentiality.
- **Do not** be judgmental or jump to conclusions – keep an open mind.
- **Do not** asking leading questions.
- **Do not** discuss with the person alleged to have caused harm.
- **Do not** destroy any evidence.

Important: If an adult starts disclosing something but does not continue when he is told that it cannot remain confidential, this needs to be raised as a concern with your line manager and Safeguarding Officer. You can still support the adult by directing him/her to helplines and websites that can offer support (see *Contacts*).

If you hear about an incident of abuse from a third party (this is when someone else tells you about what they have heard or seen happen to an adult at risk), encourage them to report the facts of what they know or contact a Helpline.

10.6.1 Key points to remember about disclosure

- Many incidents of abuse or crimes only come to light because the abused person tells someone.
- The person may not appreciate the significance of what they are sharing. They may not realise or accept they are being abused.
- Disclosure may take place many years after the actual event or when the person has left the setting in which they were afraid.

10.6.2 Allegations of Previous Abuse

Allegations of abuse may be made some time after the event. Where such an allegation is made, the Club will follow the procedures as detailed in this section and report the matter to appropriate Adult Services and the police.

If the allegation involves a member of staff, the Premier League and the FA (or other NGB) will be informed by the Head of Safeguarding & Welfare. This is because other adults at risk, either within or outside sport, may be at risk from this person.

10.7 When to contact Emergency Services

Direct contact should be made with Emergency Services (dial 999) if:

- The adult is in need of urgent medical attention.
- A serious crime has taken place or there is a need for an immediate police response to protect the adult at risk.

Otherwise, report to your line manager who will speak with the Safeguarding Officer or Head of Safeguarding & Welfare.



10.8 Concerns about poor practice

Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.

In the first instance, staff should discuss with their line manager. If there are reservations about sharing concerns with the line manager, then any of the following can be contacted directly: Safeguarding Officer, Head of Safeguarding & Welfare, Head of Department or HR Manager.

If a member of staff believes that this route has been ineffective, **whistleblowing** procedures are in place for such concerns to be raised (found in the Staff Handbook)

10.9 Concerns about a colleague's practice

If you have concerns about a colleague's practice, follow these stages:

1. Talk to your line manager about the problem, or talk to someone senior such as your Safeguarding Officer or Head of Safeguarding & Welfare. To make a formal complaint: record the facts and make a complaint using the Club's **Grievance Procedure**.
2. If you do not feel able to raise your concern with your line manager or other management (including your Safeguarding Officer, the Head of Safeguarding & Welfare and Head of Department), consult and follow the Club's **Whistleblowing Policy**.
3. If you have tried all these stages or you do not feel able to raise your concern internally, you can raise your concern in confidence with an organisation called Safe Club or contact Protect - formerly Public Concern at Work - for advice and guidance (see 'Whistleblowing' and 'Contacts').

Where there are concerns about the Head of Safeguarding & Welfare, these should be referred to the Deputy for the Head of Safeguarding & Welfare (the Operational Support Manager).

In an external organisation, concerns about its staff should be reported in line with its reporting procedures.

When reporting concerns about another member of staff you should understand that it is common for there to be a high degree of stress including feelings of guilt for having reported the matter. All information is treated with confidentiality. If you require anonymity, you should say so and explain why to the person to whom you have made the report.

Do not discuss the concern with the person alleged to have caused harm.

10.10 Concerns arising from Complaints

Concerns may arise from the Club's complaint and appeals procedures. Complaints by adults at risk, their carers or partner organisations about abusive behaviour by staff or any behaviour which constitutes poor practice, should be shared with the Safeguarding Officer who in turn will share with the Head of Safeguarding & Welfare. Complaints are open to challenge through the appeals procedure.

If a complaint leads to a safeguarding adult investigation, the Club can decide to postpone or not to commence the complaints investigation if this would compromise the safeguarding adults investigation. The complainant would be informed of this course of action and the reason for this.

10.11 Allegations against staff

Any allegations against staff must be reported immediately to the Head of Safeguarding & Welfare who will refer to the Local Authority Designated Officer in Haringey.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for an adult at risk to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

An adult at risk 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 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 not the default option and alternatives to suspension will always 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/children are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff



The procedures for dealing with allegations against staff can be found in the Club's Managing Allegations Policy and Procedures.

10.11.1 Historical Allegations

Allegations concerning staff who no longer work at the Club, or historical allegations will be reported to the Safeguarding Adults Team and, if the role involves working with children the Local Authority Designated Officer will be consulted too.

10.12 Helplines

Helplines offer advice and guidance, and can be used by anyone – whether your concern is minor (you may be unsure whether to report something) or major (i.e. you have been informed of possible abuse). Calls are confidential. Helplines can be contacted for out-of-office support or for a prompt response to a concern or allegation when Club officials are not readily available. See 'Contacts'. Staff may also access the Club's Employee Assistance Programme (details found on the Shelf).

10.13 Whistleblowing

Any member of staff who believes that allegations or suspicions, which have been reported to the line manager, Safeguarding Officer, Head of Department or Head of Safeguarding & Welfare, have not been investigated properly should follow the Club's Whistleblowing Policy, which identifies alternative contact points within the Club. The Club's Whistle-Blowing Policy is included in the Staff Handbook.

In relation to the above, if any member of staff believes that allegations or suspicions are not being investigated properly by the Club, they should report to Safe Club (see 'Contacts').

The whistleblower may want to get independent legal advice first, or contact their trade union or professional body. The whistleblower can also contact the independent whistleblowing charity Protect, formerly Public Concern at Work, for free and confidential advice (see Contacts).

10.14 Confidentiality

Confidentiality must be maintained for all concerned. Information is handled and shared on a need-to-know or must-know basis in order to protect adults at risk, facilitate enquiries, manage disciplinary/complaint aspects and protect any rights of the person alleged to have caused the harm. Considerations of confidentiality will not be allowed to override the rights of adults at risk to be protected from harm.

Information will be stored separately from other records and in a secure place with limited access to designated people, in line with data protection law (e.g. that information is accurate, regularly updated, relevant and secure).

10.15 Information sharing

In raising safeguarding adults concerns it is necessary to share information with others:

- Information will be shared on a 'need to know' basis when it is in the interests of the adult
- Confidentiality must not be confused with secrecy
- Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse or neglect, it may be necessary to override the requirement; and
- It is inappropriate to give assurances of absolute confidentiality in cases where there are concerns about abuse, particularly in those situations when other adults may be at risk.

10.16 Record keeping

It is vital that a written record of any incident or allegation is made as soon as possible. Written records must reflect as accurately as possible what was said and done by the people initially involved in the incident either as a victim, suspect or potential witness. Records must be kept safe as it may be necessary to make records available as evidence and to disclose them to a court at a later date.

Staff must make an accurate record at the time, including:

- Date and time of the incident.
- What the adult at risk said, using their own words (their account) about the abuse and how it occurred or exactly what has been reported to you.
- Appearance and behaviour of the adult at risk and/or any injuries observed.
- Name and signature of the person making the record.
- If you witnessed the incident, write down exactly what you saw.



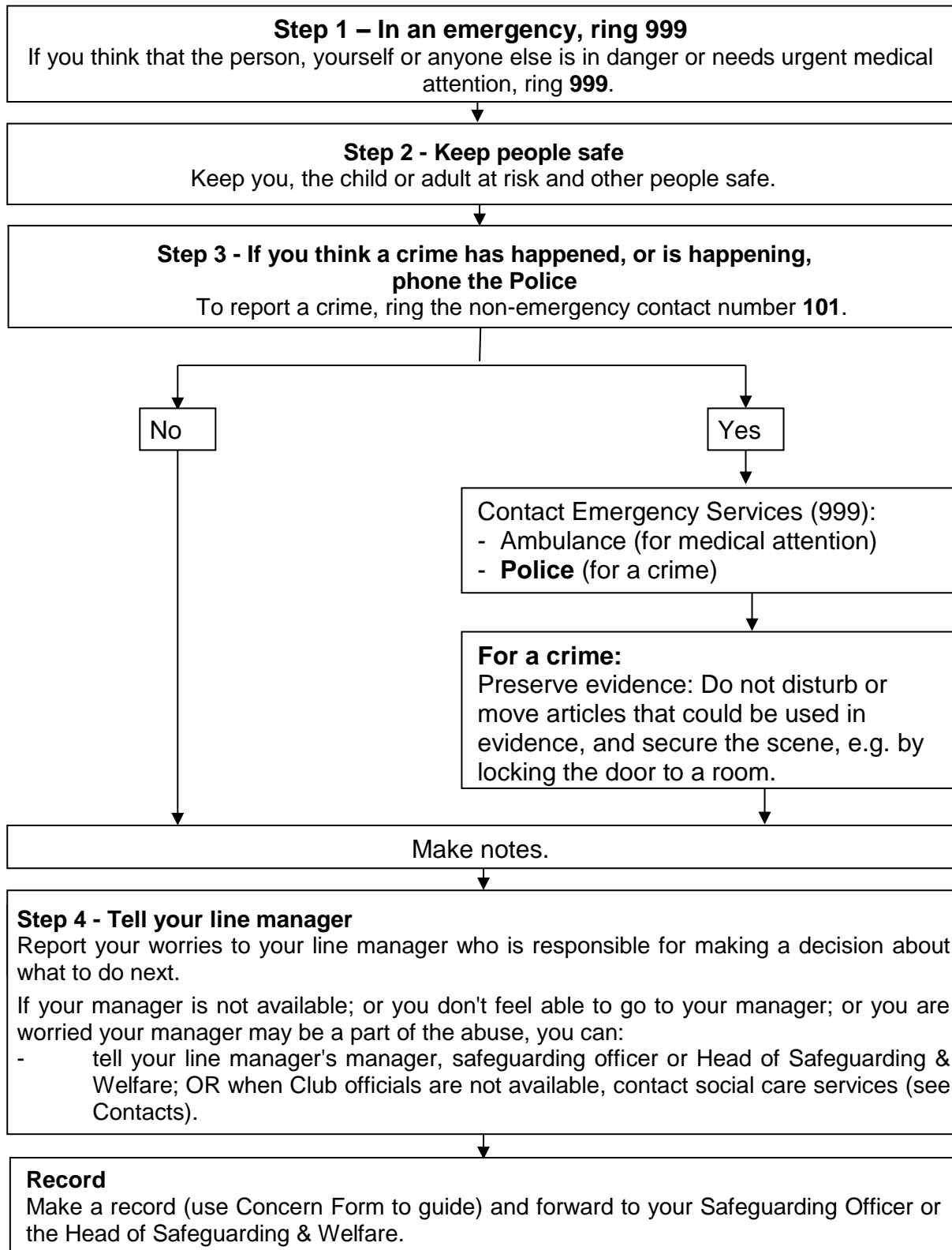
The record should be factual. However, if the record does contain an opinion or an assessment, it should be clearly stated as such and be backed up by factual evidence. Information from another person should be clearly attributed to them.

10.17 FLOWCHART FOR STAFF: RAISING AN ALERT

(An **alert** is a concern that an adult at risk is or may be at risk of being a victim of abuse or neglect. An alert may be a result of a disclosure, an incident, or other signs or indicators.)

ALERT- Abuse discovered or suspected

A concern that an adult at risk is or may be at risk of being a victim of abuse or neglect.



IMMEDIATELY (if an emergency) OR WITHIN 4 HOURS

**Do not interview or investigate.
Maintain confidentiality.**



11. SAFEGUARDING STRUCTURES

11.1 Safeguarding Lead

Once the information has reached the Head of Safeguarding & Welfare, in their role as the Safeguarding Lead, it is their responsibility to decide if a referral is needed and make the referral to Adults Social Care (see Contacts) where the incident took place.

- In the absence of the Head of Safeguarding & Welfare, a Safeguarding Officer or the Deputy will take over the role.
- If the Head of Safeguarding & Welfare is implicated, this would be investigated by either an outside body supervised by HR or the Director of Finance and Operations.

Once the concern has been raised with the Head of Safeguarding & Welfare, they will discuss with the member of staff (if appropriate), Safeguarding Officer and/or Line Manager and decide on the most appropriate course of action.

11.2 Roles of Management

To summarise:

- Take any immediate action to identify and address the risk.
- Decide if a referral is needed.

11.2.1 Role of the Safeguarding Lead

- Raises Alert (Concern) within 24 hours of allegation, suspicion or concern;
- Completes the appropriate LA Alert form;
- Contacts the Safeguarding Adults Team where the incident took place (who will involve the police if required) and copy to Safeguarding Co-ordinator in the local authority in which the person lives (if not the same).
- If an allegation has been against a member of staff or volunteer, the Safeguarding Lead will discuss this with the Safeguarding Adults Team. If the person also works with children, the Haringey LADO will be consulted.

If the concern is assessed as a referral, the Head of Safeguarding & Welfare:

- Notifies the Club's most senior administrative officer (the Director of Finance and Operations in the role of Company Secretary) that a referral has been made.
- Completes 'the Affiliated Football Referral Form' to notify the FA Safeguarding Team (safeguarding@thefa.com) and the Head of Safeguarding at the Premier League (safeguarding@thepremierleague.com) that a referral has been made to an external agency.
- Tottenham Hotspur Foundation – in addition: If the referral relates to a member of staff, worker, consultant, third party or volunteer then the Premier League Charity Fund (E: safeguarding@plcf.co.uk) and the Charity Commission (E: RSI@charitycommission.gsi.gov.uk) must be informed.

Note: If the abuse relates to a participant disclosing abuse outside the Foundation, this does not need to be shared with the PLCF or Charity Commission. The Charity Commission are only expecting reports regarding abuse or harm to beneficiaries within the charity's care.

The local authority will lead on any investigation after this point. The Head of Safeguarding & Welfare, as the Safeguarding Adults Lead, will be the main point of contact and provide assistance as required. This does not prevent the Club from taking steps through HR processes to deal with the alleged person if a member of staff.

11.2.2 Role of the Line Manager

The Line Manager will:

- Take reasonable and practical steps to safeguard the adult at risk.
- If the person causing the harm is also an adult at risk, arrange for a member of staff to attend to their needs.
- Make sure that other service users are not at risk.
- Support any member of staff or volunteer who raised the concern.
- Enable relevant staff to participate in the Safeguarding Adults process.
- Ensure that staff delivering a service to the adult at risk are kept up to date on a need-to-know basis and do not take actions that may prejudice the investigation.

11.2.3 Role of the Head of Department and HR

If a concern involves staff: after consultation with the Safeguarding Adults Team, the Head of Safeguarding & Welfare will liaise with the Head of Department and the HR Manager who will:

- In line with the Club's disciplinary procedures, suspend staff suspected of abusing an adult or adults at risk.



11.3 Deciding whether or not to make a referral

As well as deciding whether or not to refer the issue to a Safeguarding Adults referral point, the Head of Safeguarding & Welfare must also decide whether to follow other relevant Club reporting procedures. Where an alert indicates that a member of staff may have caused harm, referral to the organisation's disciplinary procedures will also be considered.

A referral should be made when:

- the person is an adult at risk and there is a concern that he is, or is at risk of, being abused or neglected, and at risk of significant harm.
- the adult at risk has capacity to make decisions about his own safety and wants this to happen.
- the adult at risk has been assessed as not having capacity to make a decision about his own safety, but a decision has been made in his best interests to make a referral.
- a crime has been or may have been committed against an adult at risk without mental capacity and to report a crime and a 'best interests' decision is made.
- the abuse or neglect has been caused by a member of staff or a volunteer.
- other adults or children are at risk from the person causing the harm.
- the concern is about institutional or systemic abuse.
- the person causing the harm is also an adult at risk.

11.4 Making a decision not to refer

If the adult at risk has capacity and does not consent to a referral and there are no **public or vital interest* considerations**, he should be given information about where to get help if he changes his mind or if the abuse or neglect continues and he subsequently wants support to promote his safety. The referrer must assure himself that the decision to withhold consent is not made under undue influence, coercion or intimidation.

A record must be made of: the concern; the decision of the adult at risk; and of the decision not to refer, with reasons. A record should also be made of what information was given to the adult at risk.

An investigation# under the safeguarding procedures would not be carried out against wishes of an adult at risk, unless:

- others are at risk from the same person, service or setting;
- the seriousness of the situation requires immediate action which is proportionate to the circumstances and lawful.

* **Vital interest** is a term used in the Data Protection Act 2018 to permit sharing of information where it is critical to prevent serious harm or distress or in life threatening situations.

A note on investigations involving people with special needs – be aware:

- A person with special needs may be more easily influenced by the way information and choices are presented and there may be a tendency to guess an answer rather than say "don't know".
- People with special needs may need more time to understand and think about a question. Ensure adequate time is given to understand the question; reassure the person that "don't understand", "don't know" "don't remember" are acceptable answers if true
- People with special needs are not always used to having their views listened to and may be more easily influenced by others even when they have a different view themselves.

11.5 Allegations of Previous Abuse

Allegations of abuse may be made some time after the event. Where such an allegation is made, the Club will follow the procedures as detailed in this section and report the matter to appropriate Adult Social Care and the police.

11.6 Reporting procedure for activities for other organisations

When delivering activities for other organisation or directly under the supervision/management of organisation staff, the organisation's arrangements for reporting will apply:

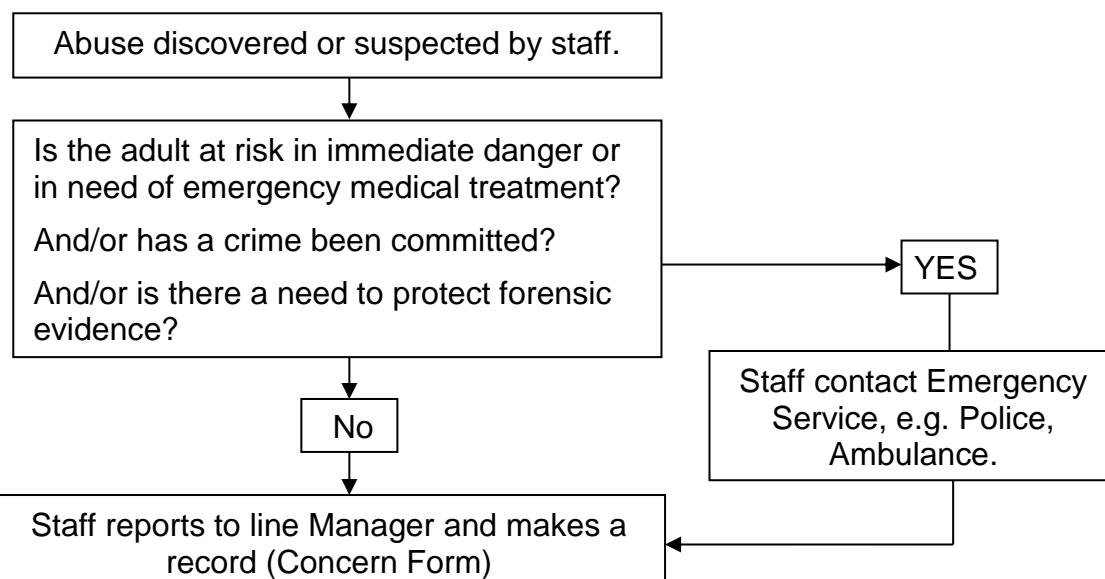
- You must inform the designated person for that organisation, who will follow their protocols.
- You should then speak with your line manager and inform your Safeguarding Officer or the Head of Safeguarding & Welfare.

When delivering activities in partnership with an organisation, but on Club premises or out of office working and without supervision from the organisation, follow the Club's procedures.

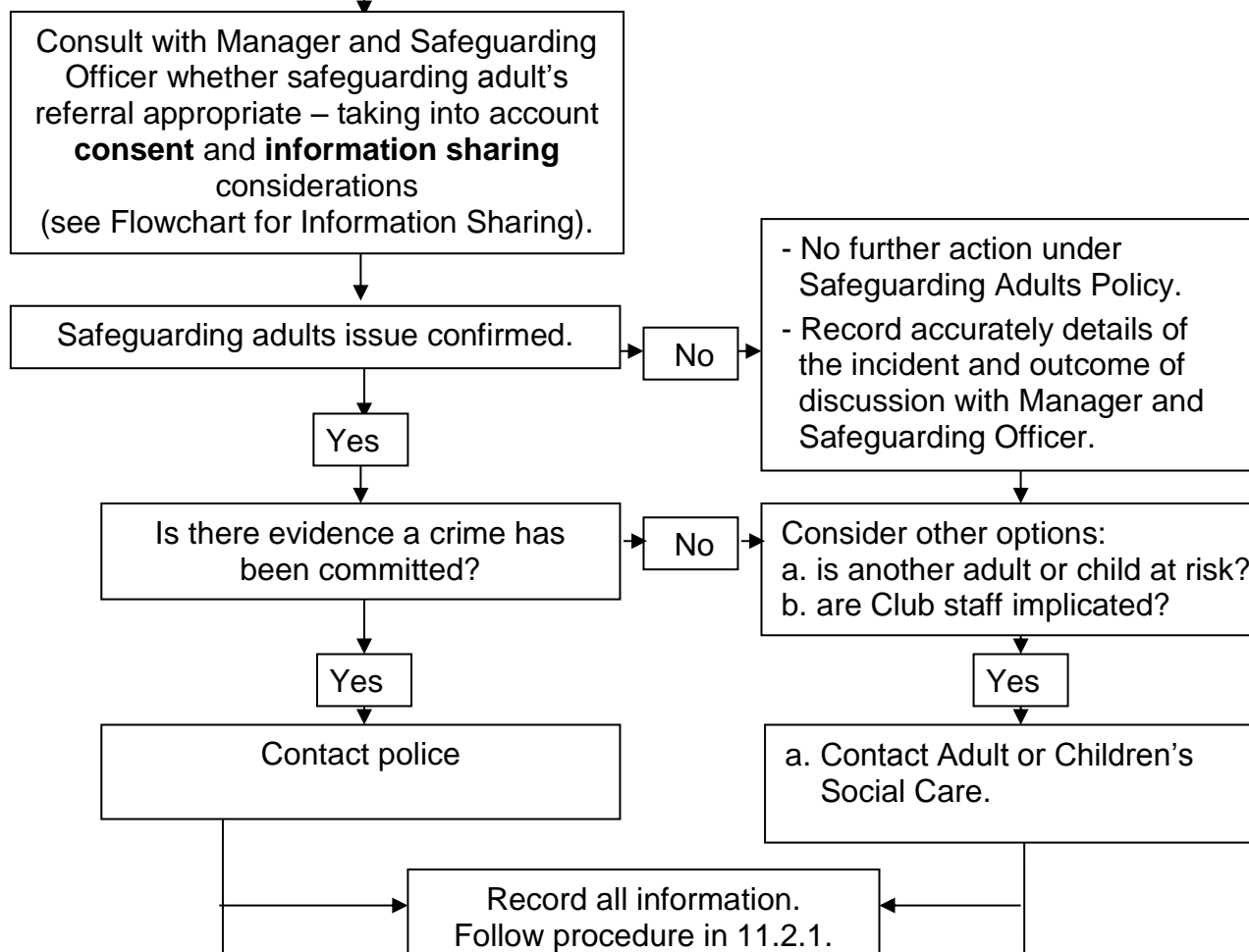


11.7 Flowchart: Suspected Abuse

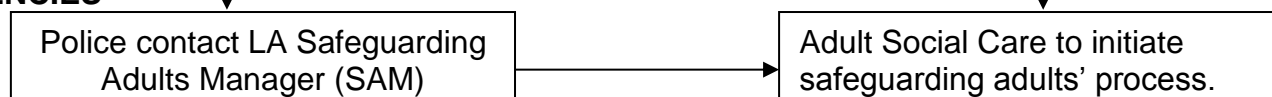
STAFF



SAFEGUARDING LEAD

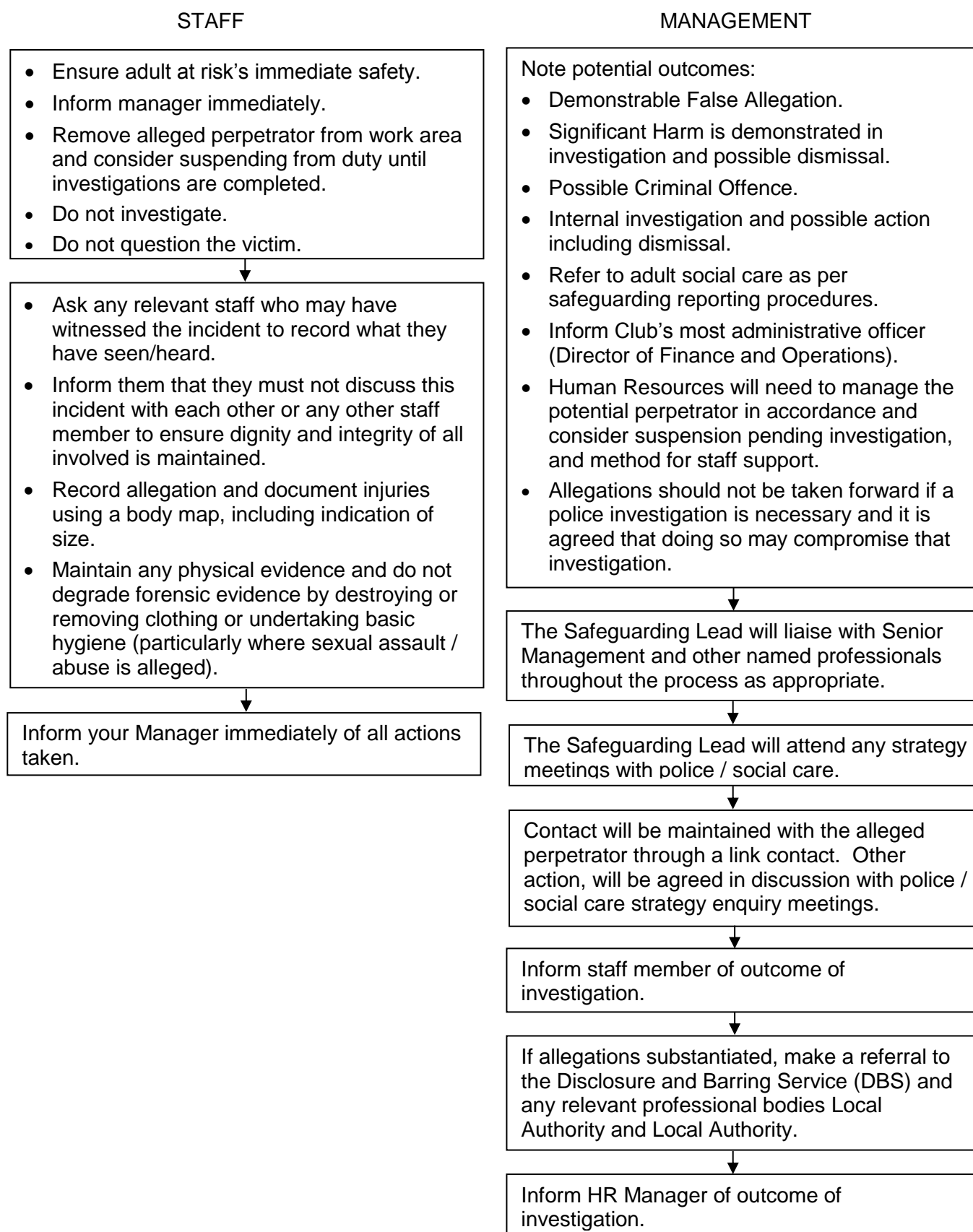


STATUTORY AGENCIES



WITHIN 24 HOURS

11.8 Flowchart: Guidance for managing allegations of abuse against staff



11.9 Flowchart for information sharing

Tottenham Hotspur will follow agreed information sharing protocols.

Principles

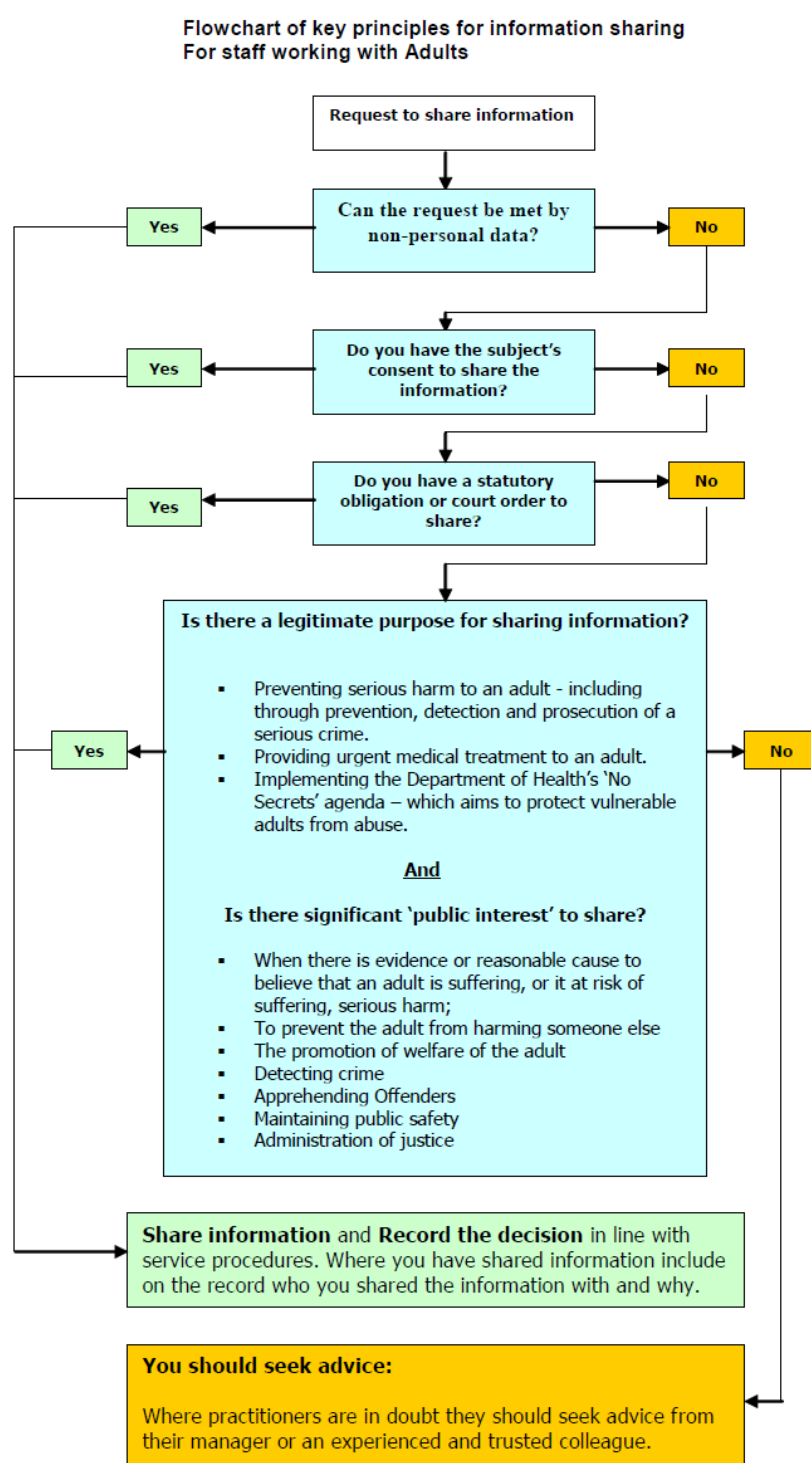
It is recognised that information sharing is key to the goal of delivering effective safeguarding practice and this should be coordinated around the needs of the individual.

Where there are concerns about the safety of an individual, the sharing of information in a timely and effective manner between organisations can improve decision-making so that actions taken are in the best interests of the individual. Information sharing is a vital element in improving outcomes for all and is essential to enable early intervention and preventative work

It is most important that people remain confident that their personal information is kept safe and secure and that staff maintain the privacy of the individual, whilst sharing information to deliver better safeguarding practice. It is therefore important that staff can share information appropriately and do so confidently.

Flowchart of key questions for information sharing

Source: Haringey Safeguarding Adults Multi Agency Information Sharing Protocol. A Practitioners Guide 2013
<https://www.haringey.gov.uk/social-care-and-health/safeguarding-adults/safeguarding-adults-policies-and-procedures#sharing-protocol>





TOTTENHAM HOTSPUR	tottenhamhotspur.com	
Tottenham Hotspur, Lilywhite House, 782 High Road, London, N17 0BX		T: 020 8365 5055
Safeguarding Lead	Dayne Matthieu, Head of Safeguarding & Welfare	
(Children and Adults)	dayne.matthieu@tottenhamhotspur.com	M: 07879 997 839
Deputy	Angela Seymour, Operational Support Manager	
	angela.seymour@tottenhamhotspur.com	M: 07867 934 969
Safeguarding Officers (Adults and Children)		
Foundation	Jack Tipton (acting), Projects & Ops Officer	
(Adults and Children)	jack.tipton@tottenhamhotspur.com....	M: 07788 130 010
Global Football Development	Natalie Pascarella, Programme Co-ordinator	
(Children)	natalie.pascarella@tottenhamhotspur.com ..	M: 073 84 461 430
Academy (Scholars)	Nick Boulli, Welfare Officer	
(Children)	nick.boulli@tottenhamhotspur.com	M: 07779 223 350
Academy (U11s-U16s)	Tay Albayrak, Physiotherapist	
(Children)	tay.albayrak@tottenhamhotspur.com	M: 07557 371 545
Academy (U6s-U10s)	Gary Broadhurst, Foundation Lead Coach	
(Children)	gary.broadhurst@tottenhamhotspur.com	M: 07825 176 866
Medical	Dr Laurence Gant	
(Children)	laurence.gant@tottenhamhotspur.com	M: 07469 852 555
Match Days/Stadium Events	Dean Smith, Safety Officer, Football Safety	
(Adults and Children)	dean.smith@tottenhamhotspur.com	M: 07766 553 225
Hospitality	Richard Knott, Snr Event Day Venue Manager	
(Adults and Children)	richard.knott@tottenhamhotspur.com	M: 07741 313 558
ADULT SOCIAL CARE		
HARINGEY:	haringey.gov.uk	
Safeguarding Adults - for concerns about an adult at risk (24 hours)		
- First Response Team (Adult Social Services)		T: 020 8489 6931/
E: firstresponseteam@haringey.gov.uk		1400
Children's Services: LADO	E: lado@haringey.gov.uk	T: 020 8489 2968
Police Community Safety Unit (24 hours)		T: 020 8345 1939
Police – Out of office emergencies only (5pm-9am)		T: 020 8489 1000
Police – Criminal Investigation Department (evenings / weekends)		T: 020 8345 0832
Haringey Safeguarding Adults Board (SAB) – key contacts:		T: 020 8489 6931
Haringey Council, River Park House, 225 High Road, London N22 8HQ		
- Jeni Plummer – Head of Operations, Adult Social Services.		
E: Jennifer.Plummer@haringey.gov.uk or		T: 020 8489 5727
- Helen Constantine, Strategic Lead – Governance & Improvement Service		
E: Helen.Constantine@haringey.gov.uk		T: 020 8489 3905
BARNET:	barnet.gov.uk	
Barnet Council Adult Social Care (ask for duty social worker)		T: 020 8359 5000
E: socialcaredirect@barnet.gov.uk		
BRENT:	brent.gov.uk	
Brent Customer Services	E: safeguardingadults@brent.gov.uk	T: 020 8937 4300
Out of hours for emergencies: 020 8863 5250		
ENFIELD:	enfield.gov.uk	
Enfield Adult Abuse Line		T: 020 8379 5212
Police Community Safety Unit	www.met.police.uk/csu	T: 020 8345 4500
WALTHAM FOREST:	walthamforest.gov.uk	
Safeguarding Adults team		T: 020 8496 3459
Emergency Duty Team		/ 3497
E: safeadults@walthamforest.gov.uk		T: 020 8496 3000
EMERGENCY SERVICES (Police, Ambulance, Fire)		T: 999 or 112
Non-emergencies: see Police/101 and NHS 111 service overleaf.		



NON-EMERGENCY SERVICES

Police (non-emergency): to contact local police or to report crime and other concerns that do not require an emergency response.

www.police.uk/101

T: 24 hrs/7 days a week 101

NHS 111 service: when you need medical help fast, but it isn't a 999 emergency.

www.nhs.uk

T: 24 hrs/7 days a week 111

NATIONAL SUPPORT/HELPLINES

GENERAL

ACT (Ann Craft Trust): safeguarding advice for families/organisations with disabled children or adults at risk.

anncrafttrust.org Safeguarding adults advice helpline T: 24 hours 0115 951 5400 (free)

Samaritans: Confidential emotional support service for people who are experiencing feelings of distress or despair.

samaritans.org E: jo@samaritans.org

T: 24 hours 116 123 (free)

Victim Support: Support for victims and witnesses of crime.

victimsupport.org.uk E: supportline@victimsupport.org.uk T: 9am-9pm 0808 168 9 111

ADULTS OVER 65

Action on Elder Abuse: Focuses exclusively on the issue of elder abuse and works to protect and prevent the abuse of vulnerable older adults.

elderabuse.org.uk

T: Mon–Fri, 10am-4pm 0808 808 8141

ADULTS WITH LEARNING DISABILITIES:

Respond: Supporting children and adults with learning difficulties, their families, carers and professionals affected by trauma and abuse.

respond.org.uk

T: Mon-Fri, 1.30pm-5pm 0808 808 0700

ADULTS WITH SENSORY IMPAIRMENT

Action for Blind People: Providing practical help and support to blind and partially sighted people of all ages.

actionforblindpeople.org.uk

T: Mon-Fri 9am-5pm RNIB Helpline: 0303 123 9999

Deafblind: Offering specialist services and human support to deafblind people.

deafblind.org.uk

T: 24 hours, 7 days a week 0800 132 320

ADULTS WITH MENTAL HEALTH PROBLEMS:

MIND: Promotes and protects good mental health.

mind.org.uk

E: info@mind.org.uk

T: Mon-Fri, 9am-6pm 0300 123 3393

Alzheimer's Society: Works to improve the quality of life of people affected by dementia.

alzheimers.org.uk

T: National Helpline 0845 300 0336

SANEline: A national out-of-office telephone helpline offering emotional support and information for anyone who is worried about their own mental health or affected by health problems: a concerned family member, friend, acquaintance or professional.

sane.org.uk

T: Out of Office 0845 767 8000

ADULTS AND DOMESTIC VIOLENCE

Refuge: Domestic Violence help for women and children.

refuge.org.uk

T: 24 hours National Helpline 0808 2000 247

WHISTLEBLOWING

Protect (formerly Public Concern At Work): The leading independent UK authority on whistleblowing. Provides confidential advice for individuals who have witnessed wrongdoing in their workplace but are unsure how to raise their concerns.

pcaw.co.uk

For whistleblowing advice contact: 020 3117 2520



TOTTENHAM HOTSPUR

CONCERN FORM

Guidelines

This form is designed to capture “initial safeguarding concerns”.

Please complete the form (*answering all relevant questions*) to the best of your knowledge of the person you are concerned about.

Once completed, send the form to: safeguarding@tottenhamhotspur.com within 24 hours.

Who is this concern about?

First Name	_____	Date of Referral	_____
Surname	_____	Activity	_____
Gender	_____	DoB & Age	_____

Information about you (the person completing this form)

Your full name: _____

Position & Department: _____

Contact number: _____

Email address: _____

My concern

Please tick which box/boxes best describes your reason for making this referral:

- I am concerned for this person’s welfare ☐
- I am concerned for the child/adult at risk’s immediate safety and feel they cannot leave the site unless an assessment of their current situation is considered ☐
- Child/adult at risk has disclosed information that makes me concerned that they may be at risk of future harm unless support is identified ☐
- Parent, relative or professional has disclosed information about the child that is concerning / a worry ☐
- Child/adult at risk’s physical presentation concerns me ☐
- Child/adult at risk’s emotional presentation concerns me ☐
- Physical/emotional needs are severely impacting on their ability to carry out basic daily functions ☐
- Physical/emotional needs are severely impacting on their ability to participate in activities ☐
- Child/adult at risk struggles to socialise with others and appears generally isolated ☐
- I am concerned for this child’s/adult at risk’s ability to participate fully due to their diagnosed/undiagnosed medical condition ☐

What has happened?

Please give full details/description in the box below in relation to your referral.

(please be factual, writing your referral in the format of):

1. Who made the disclosure?
2. When was the disclosure made (date and time)?
3. What was said and by whom?
4. Where did the concern/incident/disclosure happen (location)?
5. What is the impact of the concern/incident/ on the child in question?

1. Who made the disclosure?

2. When was the disclosure made?

Date:

Time:

3. What was said and by whom?

4. Where did the concern/incident/disclosure happen (location)?

5. What is the impact of the concern/incident/ on the child/adult in question?

What have you said?

Please tick the box/boxes that best describes your actions in relation to this referral thus far.

- I have spoken to the child/adult at risk about my concerns, and have informed them of this referral and **have their consent to refer** ☐
- I have spoken to the child/adult at risk about my concerns, and have informed them of this referral, however, **they have not given their consent to be referred.** ☐
- I have spoken to the parents/carers and **have shared my concerns with them.** ☐

Signed:

Print Name:

(if typed, your covering email will be deemed an electronic signature)

Date :

DOMESTIC VIOLENCE OR ABUSE

Source: SCIE (Social Care Institute for Excellence), April 2018

https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse?gclid=EAlalQobChMIrprj0POp4AIVmobVCh1pIQc9EAAYASAAEgJkMvD_BwE

Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called '*honour'-based violence, female genital mutilation and forced marriage.*

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

APPENDIX 4 GLOSSARY

Adult: means a person aged 18 years or over.

Adults at risk: Definition of Adult in Section 42 the Care Act 2014

An adult who may be vulnerable to abuse or maltreatment is deemed to be someone aged 18 or over, who is in an area and:

- i. Has needs for care and support (whether or not the authority is meeting any of those needs);
- ii. Is experiencing, or is at risk of, abuse or neglect; and
- iii. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Abuse is defined widely and includes **domestic** and **financial** abuse. The other crucial difference from the previous definition is that the duties apply regardless of whether the adult lacks mental capacity.

The Care Act 2014 states; Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action – **making safeguarding personal and person-led**. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Under Premier League Rules, effective 25.06.2018, the term Vulnerable Adult (Adult at Risk) is defined as:

*1. A.1.6. “**Adult at Risk**” means an adult who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or is at risk of, abuse or neglect and as a result of those care and support needs is unable to protect himself from either the risk of, or the experience of abuse or neglect. This may include (but is not limited to) people with learning disabilities, sensory impairments, mental health needs, elderly 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; means an adult 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 or herself, or unable to protect himself against significant harm or exploitation.*

This amendment is intended to align with The FA's new definition of the term, which they have introduced to reflect guidance from the Information Commissioner. The Club will apply this definition to its safeguarding policies and activities for adults at risk.

Alert is a concern that an adult at risk is or may be a victim of abuse or neglect. An alert may be a result of a disclosure, an incident, or other signs or indicators.

Alerter is the person who raises a concern that an adult is being, has been, or is at risk of being abused or neglected. This could be the person themselves, a family member, a carer, a friend or neighbour or could be a member of staff or a volunteer.

Safeguarding Lead is the person within the organisation designated to make Safeguarding Adult referrals.

Capacity is the ability of an adult at risk to make a decision about a particular matter at the time the decision needs to be made.

Care and Support Needs: The adult's needs arise from or are related to a physical or mental impairment or illness. Local authorities must consider at this stage if the adult has a condition as a result of either physical, mental, sensory, learning or cognitive disabilities or illnesses, substance misuse or brain injury... a formal diagnosis of the condition should not be required. (Care Act 2014)

Care setting/services includes health care, nursing care, social care, domiciliary care, social activities, support setting, emotional support, housing support, emergency housing, befriending and advice services *and* services provided in someone's own home by an organisation or paid employee for a person by means of a personal budget.

Carer refers to unpaid carers, for example, relatives or friends of the adult at risk. Paid workers, including personal assistants, whose job title may be 'carer', are called '**care workers**'.



Club: Tottenham Hotspur Football and Athletic Co. Ltd and includes other terms: Tottenham Hotspur, Spurs, THFC and includes **Tottenham Hotspur Foundation**.

CQC (Care Quality Commission): CQC's role is to regulate providers of health or adult social care in England.

Consent is the voluntary and continuing permission of the person to the intervention based on an adequate knowledge of the purpose, nature, likely effects and risks of that intervention, including the likelihood of its success and any alternatives to it.

DBS (The Disclosure and Barring Service): In December 2012, the CRB and ISA (Independent Safeguarding Authority) merged to become the Disclosure and Barring Service (DBS) and any reference made to CRB after this date should be taken to mean DBS. The DBS is an Executive Non-Departmental Public Body sponsored by the Home Office. The DBS supports organisations that recruit people to work with children and other eligible positions by processing Disclosure certificates. DBS checks are complementary to an organisation's recruitment practice and represents a step forward in the safeguarding of vulnerable groups (children and adults).

EDO (emergency duty officer) is the social worker on duty in the Emergency Duty Team (EDT).

EDT (emergency duty teams) are social services teams that respond to out-of-office referrals where intervention from the council is required to protect a vulnerable child or adult, and where it would not be safe, appropriate or lawful to delay that intervention to the next working day.

Investigation is a process to gather evidence to determine whether abuse took place.

LADO is the Local Authority Designated Officer (also 'Designated Officer'), located within Children's Services, who deals with allegations against professionals. A LADO deals with issues arising in connection with all personnel working with children and young people, whether paid casual or permanent employees, contractors, agency or other workers and volunteers. They deal with concerns, allegations or offences which arise in situations outside the workplace. The LADO provides advice, guidance and help to determine whether an allegation requires referral.

Mental capacity refers to whether someone has the mental capacity to make a decision or not. There is a presumption that adults have mental capacity to make informed decisions about their lives. If someone has been assessed as not having mental capacity, decisions will be made in their best interests as set out in the Mental Capacity Act 2005 and Mental Capacity Act *Code of Practice*.

Referral: an alert becomes a referral when it is passed on to a Safeguarding Adults referral point and accepted as a Safeguarding Adults referral.

Regulated activity – Adults: The focus is on the activities needed by the adult in the form of services, not where the activity takes place. The definition is included here since any person using or reliant on a regulated activity in an aspect of his day-to-day living is likely to be an adult at risk. An individual only needs to engage once in the activities listed below to be carrying out regulated activity relating to adults. The definition focuses on those activities which, should they be needed by any adult, mean that an adult is considered vulnerable at the point of receiving them.

There are six types of activity which can be classed as regulated activity relating to adults:

- healthcare for adults provided by, or under the direction or supervision of a regulated health care professional
- personal care for adults involving hand-on physical assistance with washing and dressing, eating, drinking and toileting; prompting and supervising an adult with any of these tasks because of their age, illness or disability; or teaching someone to do one of these tasks
- social work - provision by a social care worker of social work which is required in connection with any health services or social services
- assistance with an adult's cash, bills or shopping because of their age, illness or disability arranged via a third party
- assisting in the conduct of an adult's own affairs under a formal appointment
- conveying adults for reasons of age, illness or disability to, from, or between places, where they receive healthcare, personal care or social work arranged via a third party.

A person whose role includes the day-to-day management or supervision of any person engaging in regulated activity, is also in regulated activity. However, regulated activity relating to adults excludes any activity carried out in the course of family relationships, and personal, non-commercial relationships.



Safeguarding Adults process refers to the decisions and subsequent actions taken on receipt of a referral. This process can include a strategy meeting or discussion, an investigation, a case conference, a care/protection/safety plan and monitoring and review arrangements.

Service User is the term used to refer to an adult at risk participating in a Club activity as guest or visitor. It does not apply to an adult at risk who is a member of the Club's personnel (employee, worker, etc.).

Staff: Anyone in paid work who provides services or activities for the Club, and includes the terms: employee and personnel.

Vital interest is a term used in the Data Protection Act 2018 to permit sharing of information where it is critical to prevent serious harm or distress or in life threatening situations.



The Care Act 2014

The Department of Health First published the Care Act 2014 in October 2014. It is the base upon which social care will develop over the next few decades and enshrines the new statutory principle of individual wellbeing which is the driving force behind the Act, and makes it the responsibility of local authorities to promote wellbeing when carrying out any of their care and support functions.

The introduction of the Care Act 2014 puts adult safeguarding on a statutory footing for the first time, embracing the principle that the '**person knows best**'. It lays the foundation for change in the way that care and support is provided to adults, encouraging greater self-determination, so people maintain independence and have real choice.

There is an emphasis on working with adults at risk of abuse and neglect to have greater control in their lives to both prevent it from happening, and to give meaningful options of dealing with it should it occur.

For staff, the Act provides clearer guidance, and supports pathways to working in an integrated way, breaking down barriers between organisations. This approach has been championed by all the organisations who have worked together to produce the 'London Multi-agency Safeguarding Policy and Procedures'.

The Care Act and statutory guidance (March 2016)

The edition published on 10 March 2016 supersedes the version issued in October 2014. It takes account of regulatory changes, feedback from stakeholders and the care sector, and developments following the postponement of social care funding reforms to 2020.

The Equality Act 2010

The Equality Act 2010 became law in October 2010 and covers the same equality strands that were protected by previous equality legislation, but extends some protections to groups not previously covered, and also strengthens particular aspects of equality law.

It replaced previous legislation (such as the Race Relations Act 1976 and the Disability Discrimination Act 1995) to ensure consistency in what employers need to do to make an organisation compliant with the law. This policy has been screened for impact on equalities.

Human Rights Act 1998

This Act came into force in this country on 2 October 2000. It brings the rights outlined in the European Convention of Human rights into English law for the first time. The Act is designed to protect individuals from abuse by state institutions and people working for these institutions.

Data Protection Act 2018

Vital interest a term used in the Data Protection Act (DPA) 2018 to permit sharing of information where it is critical to prevent serious harm or distress, or in life threatening situations.

Information Sharing

Haringey Safeguarding Adults Board - Information Sharing Protocol

The golden rule is: if you need to share information in order to protect someone from harm or criminal activity, you must do so.

This is an agreement between Partner Organisations to facilitate and govern the sharing of information between agencies working with Adults (aged 18 and over). The purpose of the protocol is to facilitate the secure exchange of information to cover specific social care issues not previously addressed by the Crime, Disorder and Anti-Social Behaviour protocol.

Sexual Offences Act 2003

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

Mental Capacity Act 2005

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

This act provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves; and establishes a framework for making decisions on their behalf.

Best Interest - the Mental Capacity Act 2005 (MCA) states that if a person lacks mental capacity to make a particular decision then whoever is making that decision or taking any action on that person's behalf must do so in the person's best interest. This is one of the principles of the MCA.

The Mental Capacity Act 2005 provides a statutory framework to empower and protect adults at risk who are not able to make their own decisions and is underpinned by five key principles:

- A presumption of capacity - every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise.
- The right for individuals to be supported to make their own decisions - people must be given all appropriate help before anyone concludes that they cannot make their own decisions.
- Individuals must retain the right to make what might be seen as eccentric or unwise decisions.
- Best interests – anything done for or on behalf of people without capacity must be in their best interests.
- Least restrictive intervention - anything done for or on behalf of people without capacity should be the least restrictive of their basic rights and freedoms.

The Act sets out a single clear test for assessing whether a person lacks capacity to take a particular decision at a particular time. It is a “decision specific” test. No one can be labelled “incapable” as a result of a particular medical condition or diagnosis.

The Act makes it clear that a lack of capacity cannot be established merely by reference to a person's age, appearance, or any other condition or aspect of a person's behaviour which might lead others to make unjustified assumptions about capacity. A person lacks capacity in relation to a specific matter if he/she is unable to:

Make a decision for him/herself in relation to the matter because of impairment or a disturbance in the functioning of the mind or brain [Mental Capacity Act 2005].

- Understand the information relevant to make the decision
- Retain the information
- Use or weigh that information as part of the process of making the decision

Communicate their decision, whether by talking, using sign language or any other means [Mental Capacity Act 2005].

IMCA (independent mental capacity advocate) established by the Mental Capacity Act (MCA) 2005. IMCAs are mainly instructed to represent people where there is no one independent of services, such as family or friend, who is able to represent them. IMCAs are a legal safeguard for people who lack the mental capacity to make specific important decisions about where they live, serious medical treatment options, care reviews or adult safeguarding concerns.

Independent Mental Health Advocate - under the Mental Health Act 1983 certain people known as ‘qualifying patients’ are entitled to the help and support from an Independent Mental Health Advocate. If there is a safeguarding matter whilst the IMHA is working with the adult at risk, consideration for that person to be supported by the same advocate should be given.

Version	Date	Author	Status	Comment
V.2	Feb 2018	Operational Support Manager	<p>Review - document reviewed in light of feedback from Barnardo's.</p> <p>Key changes:</p> <ul style="list-style-type: none"> - Concern Form replaces Incident Form (Appendix 2). - Jack Tipton acting Safeguarding Officer for Foundation (Nikki Kelly left in Nov 2018). - Domestic Abuse (Appendix 3) in line with SCIE guidance for adult abuse. - Information chart (Appendix 9) updated to reflect Haringey SAB 'Safeguarding Vulnerable Adults – Quick Reference Guide'. 	To reflect feedback from Barnardos.
V.1	Oct 2018	Operational Support Manager	<p>Review:</p> <ul style="list-style-type: none"> - References to government documents: <ul style="list-style-type: none"> o Working Together to Safeguard Children 2015 changed to 2018; o Information Sharing changed to 2018; - Reporting Procedure for the Safeguarding Lead updated to include Premier League Charitable Fund and the Charity Commission for Foundation referrals related to beneficiaries. - Roles - Dayne Matthieu, Head of Safeguarding & Welfare and Welfare added as safeguarding lead and former safeguarding lead Angela Seymour's new role added as Operational Support Manager, as well as Deputy. Richard Knott added as Safeguarding Officer for Hospitality. - Updated Haringey Safeguarding Adults contacts. - Definitions: FA's and Premier League's definition of Vulnerable Adult added to definition of Adult at Risk. - Helplines –new Ann Craft Trust safeguarding adults advice helpline added (similar to the NSPCC's safeguarding children helpline). - Addition of new Appendix 9 – Safeguarding Information (poster) 	In line with Football Secretary's email of 25.06.2018.
V1.0	Dec 2017	Safeguarding Lead	Safeguarding Officers updated to included Chris Acaster in Global Coaching. Dean Smith (Safety Officer) added as Safeguarding Officer for match days.	

V1.0	Sept 2017	Safeguarding Lead	<ul style="list-style-type: none"> - Brent added to Contacts. - Updated to reflect changes in Safeguarding Officers: Tay Albayrak replaces David McGinness .Dr Laurence Gant replaces Dr Imtiaz Ahmad, Match Days TBC. - Version Control sheet included in policy as an appendix (previously had been a separate document). - Equality Impact Assessment included in policy as an appendix (previously had been a separate document). 	Brent added to Contacts to reflect Foundation activities extended to this London borough and match days at Wembley for the 2017/18 season. For consistency, a Version Control Sheet and Equality Impact Assessment also included in the Safeguarding and Child Protection Policy.
V1.0	July 2017	Safeguarding Lead	- Review.	Mid-season interim review
V1.0	Dec 2016	Safeguarding Lead	- Safeguarding Officers: Dr Laurence Gant replaces Dr Imtiaz Ahmad, TBC for David McGinness(Contacts).	Mid-season interim review
V1.0	May 2016	Safeguarding Lead	Approved by Director of Finance & Operations on behalf of the Board.	Policy scrutinised by legal person prior to approval.

Tottenham Hotspur Safeguarding Adults Policy

		Yes/No	Comments
1. **	Does the policy/guidance affect one group less or more favourably than another on the basis of:	No	
1.1	<ul style="list-style-type: none"> Age 	Yes	This policy relates to people over the age of 18 years – people under 18 years have separate safeguarding and child protection policy – but both policies are linked to protect vulnerable groups. Older people in institutions are at particular risk of abuse.
1.2	<ul style="list-style-type: none"> Disability 	Yes	People with disabilities who are reliant on services to support either their mental or physical health have increased vulnerabilities and increased risk of all types of abuse. This policy raises awareness for staff to report and alert people to any specific issues.
1.3	<ul style="list-style-type: none"> Gender Reassignment 	Yes	The transition from one sex to the other has both a physical and mental impact on individuals which adds to the level of risk. In addition societal attitude can make this group isolated and also abused.
1.4	<ul style="list-style-type: none"> Marriage/ Civil Partnership 	Yes	High levels of abuse in both forced and arranged marriages and exploitation of vulnerable women often in isolated communities.
1.5	<ul style="list-style-type: none"> Pregnancy / Maternity 	Yes	High levels of reported domestic violence for pregnant women.
1.6	<ul style="list-style-type: none"> Race, Nationality, Culture, Ethnic origins 	Yes	This policy aims to ensure that all vulnerable groups, regardless of race are safeguarded. Some particular ethnic groups have cultures that can make some people in their culture more vulnerable so this policy helps to raise the awareness for staff about these groups and what action to take.
1.7	<ul style="list-style-type: none"> Religion or belief 	Yes	This policy should ensure that all vulnerable groups regardless of race are safeguarded. Some particular ethnic groups have cultures that can make some people in their culture more vulnerable so this strategy helps to raise the awareness for staff about these groups and what action to take.

		Yes/No	Comments
			Some religions advocate practices such as genital mutilation for women which is illegal in Britain – this policy raises awareness for staff to raise concerns and issues.
1.8	• Sex (Gender)	Yes	Evidence shows that there is a higher incidence of domestic abuse for women and that can make them particularly vulnerable. Some cultures advocate practices such as genital mutilation for women which is illegal in Britain – this policy raises awareness for staff to raise concerns and issues.
1.9	• Sexual Orientation including lesbian, gay and bisexual people	Yes	High incidence of domestic abuse in same sex relationships both within the relationship but also other forms of abuse from a wider society.
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	Yes	See all the above comments.
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	

** Nil impact: process stops here; complete the screening section and which is part of policy template.

Low impact: 1 – 3 yes's, full EIA required, but not an immediate priority, but must be completed within 6 months of policy ratification

High impact: 4 – 9 yes's, full EIA required using the Full EIA template. Best practice is to do so with the groups affected.

Assessment completed by: Angela Seymour, Operational Support Manager

Date: October 2018



TOTTENHAM HOTSPUR

CODE OF ETHICS AND CONDUCT

Tottenham Hotspur is committed to safeguarding children* and adults at risk**

Activities for children/adults at risk should be carried out in a safe, positive and encouraging environment.

It is the responsibility of adults and children or adults at risk to treat one another with **dignity, respect, sensitivity** and **fairness**, and promote a *child/adult at risk centred perspective*.

- Listen to children/adults at risk and involve them in decision making as appropriate.
- Encourage and praise children/adults at risk – give constructive feedback.
- Respect a child's/adult at risk's uniqueness/identity and right to personal privacy.
- Encourage children/adults at risk to feel comfortable to point out attitudes or behaviour they do not like.
- Provide an example of good conduct (this includes not smoking, drinking alcohol or using abusive/bad language in front of children/adults at risk).
- As minimum, two adult staff should be present and within sight/hearing of an activity or interaction with children/adults. Staff ratios should be appropriate to the age and the activity.
- Maintain professional relationships and distance, and know your limits of expertise and qualifications.
- Operate within the Club's guidance and procedure.
- Challenge unacceptable behaviour and report any issues, complaints or concerns.
- **Self report** any situations that may have compromised professional boundaries or Club policy.
- Report concerns or allegations and follow the reporting procedure for your activity, if in doubt speak with your manager.

Follow guidance for **safe working practice** and maintain a clear boundary between professional and personal life.

Staff should protect themselves from compromising situations:

- **Avoid** favouritism and spending excessive time alone with a child/adult at risk away from others.
- **DO NOT** give lifts to children/adults at risk, except when organised or authorised by the Club.##
- **DO NOT** have personal direct electronic communication with a child/adult at risk (e.g., email, text, social media). All communication with children is via the Club through the parent/carer or school/organisation, and using Club IT.##
- **Do not** give or receive personal gifts from children – any gifting should be organised by the Club.
- **Do not** have inappropriate physical and verbal or written contact with children/adults at risk or take part in rough physical or sexually-provocative games, including horseplay.
- **Do not** allow or take part in any form of inappropriate touching or relationships.
- **Do not** allow children/adults at risk to use inappropriate language; always challenge this behaviour.
- **Do not** make sexually-suggestive comments to a child/adult at risk, even in fun.
- **Do not** reduce a child/adult at risk to tears as a form of control.
- **Do not** allow allegations made by a child/adult at risk to go unchallenged, unrecorded or not acted upon and don't jump to conclusions about others without checking the facts.
- **Do not** do things of a personal nature for children/adults at risk that they can do for themselves.
- **Do not** invite or allow children to stay with you at your home unsupervised.
- **Do not** accept bullying, rule violations or the use of prohibited substances.

Staff should ensure they maintain **healthy, positive and professional relationships with all children (under 18s)/ adults at risk**. Staff in **positions of authority and trust** in relation to young people aged 16 and 17 years or adults at risk must not engage in sexual relationships with them while that unequal power relationship exists.

A breach in the Code of Ethics and Conduct may result in disciplinary action, possibly leading up to dismissal. Serious breaches may result in a referral to the DBS (Disclosure and Barring Service) Darlington.

Discriminatory[#], offensive and violent behaviour are unacceptable and complaints will be acted on.

* The term 'child' or 'children' applies to anyone under 18 years of age.

** An 'adult at risk' (also: 'vulnerable adult') refers to any person aged 18 and over:

- who may need care services because of age, disability or illness;
- who may not be able to protect themselves from harm.

Discrimination: prejudice; unacceptable oppressive or offensive behaviour or language in relation to ethnic origin, race, nationality, religion or belief, age, marital status, disability, gender, gender reassignment, sexual orientation, trans-gender status.

Any exemptions are subject to approval by the Club with parental consent in place.

Reviewed: October 2018



APPENDIX 9 SAFEGUARDING INFORMATION

- OUR BELIEF:**
- The safety of all children, adults and fellow workers is very important to us.
 - We need to use extra vigilance for vulnerable groups (children and adults at risk)
 - Children and adults at risk have equal rights to protection.
- OUR AIM:**
- To provide a safe and inclusive environment for everyone.

WHAT IS SAFEGUARDING

Safeguarding helps vulnerable people to live in safety. This includes children (under 18s) and adults at risk. Sometimes we may see or hear things and need to take action to keep someone safe.

WHO IS VULNERABLE

Some people may be at a higher risk of exploitation and abuse because of their age, frailty, disability or illness. A child is anyone under the age of 18 and for adults we use the term **adult at risk** (also called a **vulnerable adult**).

An **adult at risk** of harm is someone 18 years or older who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect himself from either the risk of, or the experience of abuse or neglect.

ABOUT ABUSE...

Being abused means a person is being deliberately hurt by someone else. It could be a seemingly trivial act of not treating someone with dignity and respect - to extreme punishment, cruelty or torture.

Signs of concern include: change in behaviour, bruises, self-harm, withdrawal, poor health, personal hygiene/presentation.

What is abuse of adults?

Abuse is about the misuse of the power and control that one person has over another. It's about whether harm was caused, and the impact of the harm (or risk of harm) on the individual.

Who can be affected?

Abuse can affect adults of any age, background or disability.

Who could the abuser be?

A wide range of people including:

- relatives and family members
- professional staff, paid care workers
- volunteers, other service users
- neighbours, friends and associates
- people who deliberately exploit
- strangers

ABUSE HAPPENS IN MANY WAYS...

The law defines the types of abuse as:

Physical abuse

Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical punishments.

Domestic Violence and Abuse

Including psychological, physical, sexual, financial, emotional, or so-called 'honour' based violence.

Institutional / Organisational abuse

Including neglect or poor care practice within a care setting, such as a hospital or care home, or in one's own home.

Sexual abuse

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts to which the adult has not consented or was, indecent pressured into consenting.

Psychological abuse

Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Neglect and acts of omission

Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory abuse/Hate Crime)

Including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

Financial or Material abuse

Including theft, fraud, internet scamming, coercion in relation to an adult's money, including in connection with wills, property, inheritance, financial transactions, or the misuse of property, possessions or benefits.

Modern Slavery

A serious and often hidden crime where people are exploited for financial gain by others. It takes many forms including slavery, forced labour, sexual exploitation, trafficking and even forced marriage.

Self-neglect: This covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding, as well as not eating or taking medication.

- YOUR RESPONSIBILITY:**
- TO PROMOTE THE WELFARE OF CHILDREN & ADULTS AND KEEP THEM SAFE.
 - TO REPORT CONCERNS, DISCLOSURES AND SUSPECTED ABUSE.

WHAT TO DO:

RECOGNISE possible abuse

If something doesn't feel or look right:

Look out for the signs: a cluster of symptoms or repeating patterns.

Something you have heard or seen causes you concern or you may suspect harm/abuse.

RESPOND appropriately

LISTEN. Make notes and discuss with your line manager.

REPORT your concerns

Contact your Safeguarding Officer or the Safeguarding Management Team.

RECORD your observations

Complete a **Concern Form**. Keep your own personal notes.

TOTTENHAM HOTSPUR - SAFEGUARDING CONTACTS:

Safeguarding Management Team:

Dayne Matthieu, Head of Safeguarding & Welfare M: 07879 997 839
(Safeguarding Lead for Children & Adults)
Deputy: Angela Seymour, Operational Support Manager M: 07867 934 969

Safeguarding Officers

Tottenham Hotspur Foundation:
Jack Tipton (acting) M 07788 130 010
Schedule Phone, M 07788 130 010
Global: Natalie Pascarella, M 07384 461 340
Academy: Nick Boulli, M 07557 652 373

Medical: Dr Laurence Gant,
M 07469 862 555

Match Days/Stadium Events:

Dean Smith, M 07766 553 225

Hospitality:

Richard Knott, M 07741 313 558

EXTERNAL CONTACTS – 24 hours: Emergency Services: Police/Ambulance/Fire 999 Local Police: 101

About adults

ACT Helpline T: 0115 951 5400 Visit: anncrafttrust.org

About children (under 18s) **NSPCC Helpline** T: 0808 800 5000 Visit: nspcc.org.uk/