

TOTTENHAM HOTSPUR FOOTBALL CLUB

Domestic Abuse, Coercive and Controlling Behaviours & Stalking Policy

Foreword

IMPORTANT: If you are experiencing Domestic Abuse and are in danger, **please stop reading this policy and call 999 if it is safe to do so.** If you are unable to speak on the telephone, call 999 and press 55, listen to the questions from the operator and, if you can, respond by coughing or tapping on the handset if it is safe to do so. For more information on how to make a silent call, please see <https://www.met.police.uk/contact/how-to-make-a-silent-999-call/>

This Domestic Abuse, Coercive and Controlling Behaviours & Stalking Policy (the “**Policy**”) reflects the ethos of Tottenham Hotspur Football and Athletic Co. Limited (trading as “**Tottenham Hotspur Football Club**”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “**Foundation**”) and Tottenham Hotspur Women Football Club Limited – together the “**Club**”.

The board of directors of the Club and trustees of the Foundation endorse this Policy as part of the Club’s constitution and commitment to support Players and Staff from Domestic Abuse, Coercive and Controlling Behaviours and Stalking.

The Club is committed to working in partnership with The Football Association, the Premier League and relevant statutory and regulatory agencies to ensure that information and training opportunities are available to all Players and Staff to ensure best practice when dealing with matters of Domestic Abuse, Coercive and Controlling Behaviours and Stalking.

Matthew Collecott

STRATEGIC SAFEGUARDING LEAD

Board of Directors of the Club

Trustee of the Foundation

Effective Date of Policy: April 2024

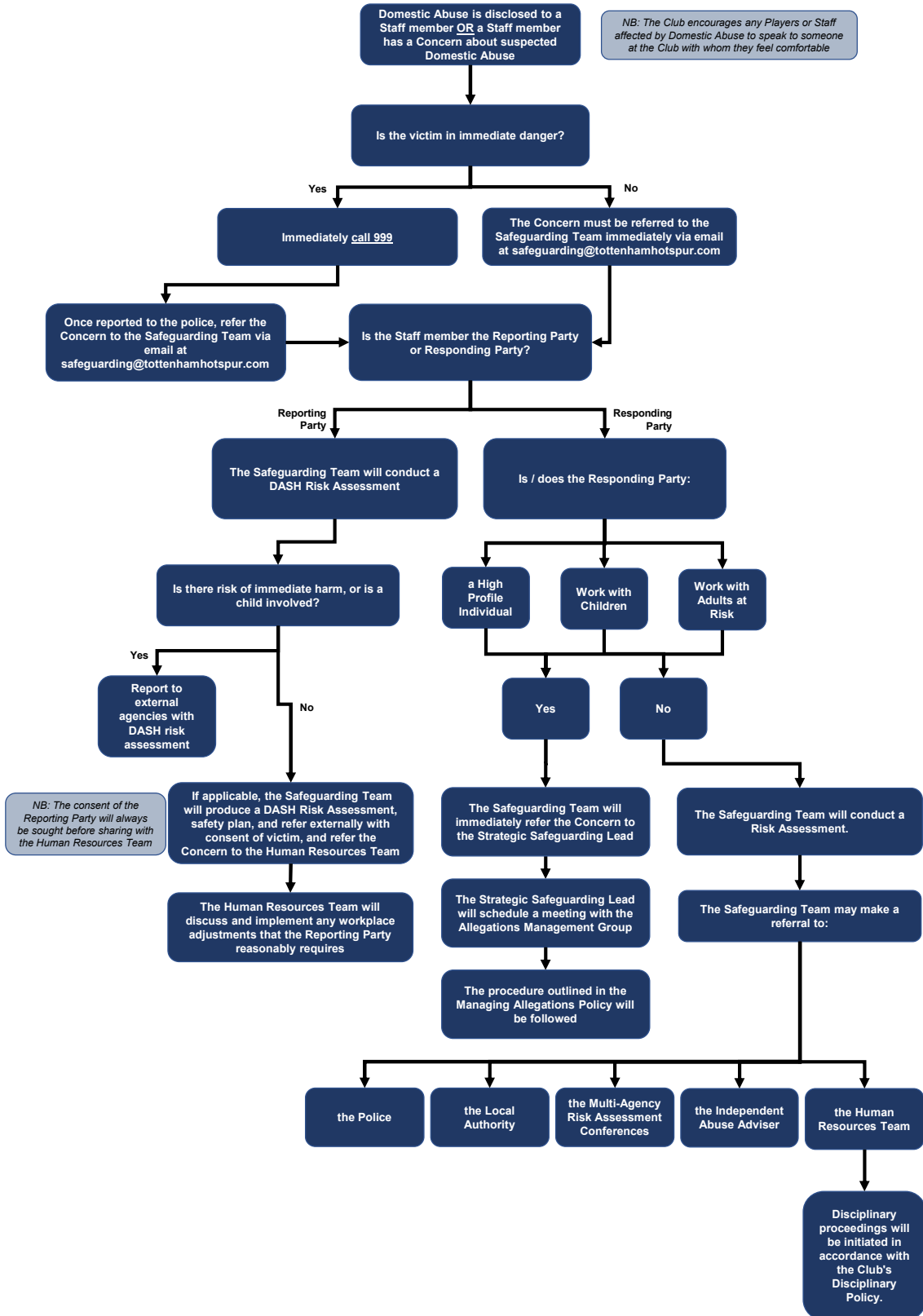
Policy Owner/Lead: Head of Safeguarding and Welfare

Review Date: April 2025

**Tottenham Hotspur Football Club – Domestic Abuse
INTERNAL ONLY**

If you are experiencing Domestic Abuse and are in danger, please stop reading this policy and call 999

NB: If you are unable to speak on the telephone, call 999, listen to the questions from the operator and, if you can, respond by coughing or tapping on the handset



Introduction

The Club recognises its moral, legal and regulatory responsibility to safeguard and promote the welfare of all Players and Staff.

The Club acknowledges that anyone (including Players and Staff) can be a victim of Domestic Abuse, Coercive and Controlling Behaviours and/or Stalking regardless of sex, gender, gender reassignment, age, ethnicity, socio-economic status, sexuality, or background and that this may have an adverse impact on their working lives.

The objectives of this Policy are to:

- a) recognise Domestic Abuse, Coercive and Controlling Behaviours and/or Stalking as an issue;
- b) raise awareness of Domestic Abuse, Coercive and Controlling Behaviours and/or Stalking and its impact on work, including how the Club can provide a safe place of work for the R of Domestic Abuse, Coercive and Controlling Behaviours and/or Stalking and empower Staff to respond appropriately to any Concerns that are made;
- c) protect and support Players and Staff who are the Reporting Party;
- d) manage Concerns relating to Players and/or Staff who are the Responding Party;
- e) encourage open conversations between the Club, Players and Staff; and
- f) direct Players and Staff to relevant advice and assistance.

The Club undertakes to make available (on request) to stakeholders electronic copies of this Policy as amended from time to time. Electronic copies of this Policy are available on the Shelf. The Shelf will also contain contact details in the event that (i) any individual is unable to download this Policy; and/or (ii) any individual requires this Policy in another form, for example, in braille or large print. All requests will be considered on their merits on a case-by-case basis. In circumstances where an individual has been classified as having an intellectual impairment, the Club shall use all reasonable endeavours to communicate the contents of this Policy to such individual in the most appropriate manner.

The Club has a dedicated “**Safeguarding Team**” with primary responsibility for working with Staff to provide guidance and support in relation to any Concerns. Player Care will have primary responsibility for Players and may work alongside the Safeguarding Team to provide guidance and support in relation to any Domestic Abuse, Coercive and Controlling Behaviours and Stalking Concerns.

Any Club-wide Concerns can be addressed to any member of the wider Safeguarding Team via the contact details below. Other helpful external agency contact details are contained within **Appendix 2**.

Safeguarding Team

Email: safeguarding@tottenhamhotspur.com

All capitalised terms used within the policy shall have the meaning given to them in Appendix 1.

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Section A: General Information

What is Domestic Abuse?

In this policy, the term Domestic Abuse refers to Abuse which takes place between two individuals aged 16 years or over who are personally connected to each other.

The term Reporting Party is used to refer to the individual who has been, or is being, subjected to Domestic Abuse.

The term Responding Party is used to describe the individual whose behaviour is “Abusive” and who is committing or has committed the Domestic Abuse.

Behaviour is “Abusive” if it consists of any of the following:

- (a) Physical or Sexual Abuse;
- (b) violent or threatening behaviour;
- (c) Coercive and Controlling Behaviours;
- (d) Economic Abuse;
- (e) Psychological, Emotional or other Abuse; and/or
- (f) Stalking.

The signs of Domestic Abuse are not always visible or obvious, and individuals experiencing Abuse may attempt to hide the effects of that Abuse. They may also provide an alternative explanation for any signs of Abuse that are apparent to colleagues or be reluctant to engage in conversation. Sometimes victims of Domestic Abuse may not identify their experiences as those of Domestic Abuse at all.

What are Coercive and Controlling Behaviours?

Coercive and Controlling Behaviours are:

- a) An individual (“**Person A**”) repeatedly or continuously engages in behaviour towards another person (“**Person B**”) that is Coercive and Controlling (there is no requirement that the activity should be of the same nature);
- b) Person A’s behaviour has a serious effect on Person B; and
- c) Person A knows or ought to know that the behaviour will have a serious effect on Person B.

A pattern of Coercive and Controlling Behaviours can be well established before a single incident is reported. In many cases the behaviour of Person A may seem innocent; especially if considered in isolation of other incidents and Person B may not be aware of, or be ready to acknowledge, abusive behaviour.

Stalking

For the purposes of this Policy, Stalking is a type of Domestic Abuse. Stalking may be understood as a pattern of four behavioural traits; “fixation”, “obsession”, “unwanted” and “repeated” which are considered intrusive and may include the following carried out by Person A (this is not an exhaustive list):

- following Person B;
- contacting, or attempting to contact Person B, by any means;
- publishing any statement or other material relating or purporting to relate to Person B (for example, publishing online without prior consent), or Stalking;
- monitoring the use of the internet, email, social networking sites, email, chat rooms or any other form of electronic communication by Person B;
- loitering in any place (whether public or private);
- interfering with any property in the possession of Person B; and/or
- watching or spying on Person B.

Domestic Abuse - Workplace Implications

The Club recognises that Domestic Abuse may have workplace implications because Abuse that an individual experiences at home is likely to have a direct impact on every aspect of their life, including their work life. The Club want all Players and Staff to be able to remain and thrive at the Club and, if informed of the Abuse, will work with the Reporting Party to make appropriate workplace adjustments (as outlined in more detail in Section B).

Where the Responding Party works in a Position of Trust in respect of Children or Adults at Risk, this will trigger the Managing Allegations Against Staff process which is located here.

Training on Domestic Abuse

Training on Domestic Abuse will be available to all members of the Safeguarding Team, Human Resources Team and line managers and Training will be made available to all Staff on request.

Confidentiality

The Club will ensure that all Players and Staff are aware of their responsibilities in relation to confidentiality. Improper disclosure of information i.e. breaches of confidentiality by any Player or Staff member will be taken seriously and may be subject to disciplinary action.

Information may be shared internally and externally depending on the circumstances. The Club will always seek to agree with the individual who is experiencing Domestic Abuse what will be communicated to colleagues, if any changes are obvious and may require explanation. As far as possible, information will only be shared on a need-to-know basis, for example, sharing information with the Human Resources Director in order to put in place workplace adjustments. The Club will only share personal data if it is absolutely necessary.

The Club will always endeavour to obtain consent before sharing information. For further information and advice on sharing information without consent please speak to a member of the Legal, Risk and Compliance Team by email on personaldata@tottenhamhotspur.com.

Section B: Reporting Party

Who to Speak with if You are Experiencing Domestic Abuse

The Club acknowledges that it can be very hard for the Reporting Party to speak out about Domestic Abuse.

The Club recognises that developing a life free from Domestic Abuse is a process and the Club will provide ongoing support for Players and Staff who disclose Domestic Abuse. The Club will respond sympathetically, confidentially and effectively to any Player or Staff member who discloses that they are experiencing Domestic Abuse.

Any Player or Staff member affected by Domestic Abuse is encouraged to speak to someone at the Club with whom they feel comfortable. The Club can then assist to refer the Reporting Party to internal support via Safeguarding and HR and external support including occupational health and independent counselling services. The Club operates an Employee Assistance Programme (“EAP”) and a mental health & wellbeing support package for Players and Staff which can be accessed via <https://tottenhamhotspur.unily.com/sites/human-resources/SitePage/13168/mental-health-first-aiders>

Recognising Domestic Abuse

There will be many instances where victim of Domestic Abuse will not be able to escape the Abuse or perpetrator of Domestic Abuse. Individuals will often not realise that they are in relationship where Domestic Abuse is present, as some Abuse may not be violent or immediately obvious; the Club therefore shall endeavour to handle cases sensitively and without any preconceptions.

The Club have outlined general guidance for Players and Staff to help prevent and identify Domestic Abuse. The Club does not expect Players and Staff to become experts on Domestic Abuse; however, it does expect all Players and Staff to be supportive of colleagues who may be affected by Domestic Abuse at work.

The Club reminds all Players and Staff of the importance of not divulging personal details of other Players and Staff, such as addresses, telephone numbers or shift patterns.

The Club also encourages Players and Staff to be familiar with some of the signs of Domestic Abuse, while recognising that these signs may also be indicative of other issues.

These signs may include but are not limited to:

a) **Physical signs:**

- visible bruising or single or repeated injury with unlikely explanations;
- changes in appearance (for example, wearing different clothes or more make-up to conceal injuries);
- alcohol and/or substance abuse; and/or
- fatigue.

b) Changes in productivity and working patterns:

- persistent lateness, absence or needing to leave work early (for example, because an individual is being prevented from leaving their house) or, conversely, spending an increased number of hours at work for no obvious reason;
- reduced quantity or quality of work for example missing deadlines or a reduction in usual performance standards;
- webcams being turned off during video calls;
- withdrawal from or lack of participation in work-related meetings and events;
- regular interruptions during the working day (for example receiving regular calls or messages which the individual may find distressing and potentially needing to leave their desk to address the communications or to compose themselves if they are distressed);
- lack of access to basic equipment or the internet when working from home (or monitoring of access);
- interception of text and other messages, letters and emails; and/or
- conduct out of character with previous employment history.

c) Changes in behaviour:

- becoming very quiet, anxious, frightened, tearful, aggressive, distracted, depressed, etc.;
- isolating themselves from family, friends and colleagues;
- obsession with timekeeping;
- secretive regarding home life; and/or
- worried about leaving Children at home with their partner for example.

d) Other signs:

- control of finances (for example, wages being paid into a new bank account or an individual not being given enough money to buy food or pay bills);
- partner or ex-partner in or around the workplace;
- partner or ex-partner exerting unusual amount of control or demands over work schedule;
- flowers/gifts being received for no apparent reason; and/or
- an individual assuming sole responsibility for Childcare arrangements.

It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that Domestic Abuse is actually taking place. If Staff have any questions, please raise these with Safeguarding Team via email at: safeguarding@tottenhamhotspur.com

What to do if You are Worried About a Player or Staff Member

If anyone is in immediate danger, call 999.

There are signs which may indicate an individual may be subject to Domestic Abuse. If you are worried about a Player or Staff, because of something you have noticed in their behaviour or appearance, or because of something they or another person has told you, you can report the Concern to the Safeguarding Team via email at safeguarding@tottenhamhotspur.com.

If a Concern involves a Child, or there is a risk of serious harm to an individual the Concern must be reported to the Safeguarding Team immediately via email at safeguarding@tottenhamhotspur.com

If you have a strong suspicion that a Player or Staff member is committing Domestic Abuse, the Concern must be reported to the Safeguarding Team immediately via email at safeguarding@tottenhamhotspur.com or consider whether calling 999 is more appropriate.

You should treat any such suspicions with the upmost confidentiality and should not discuss the matter with friends, family or colleagues.

Staff and Players should be assured that the Club will take any Concern seriously and you will not face disciplinary action for raising a Concern if it proves to be unfounded or does not merit action, provided the Concern was raised in good faith.

What to do if Domestic Abuse is Disclosed to You

If anyone is in immediate danger, call 999.

If Domestic Abuse is disclosed to you, your role is not to deal with the Domestic Abuse itself but to provide support related to work and to direct the Reporting Party to internal and external support available. If you need support or guidance following the disclosure, the Safeguarding Team are available to support all Players and Staff on a confidential basis.

If a Concern involves a Child, or there is a risk of serious harm to an individual the Concern must be reported to the Safeguarding Team immediately via email at safeguarding@tottenhamhotspur.com.

It can be difficult for Players and Staff to make a disclosure of Domestic Abuse, and your support is important and if someone discloses to you, please consider the below:

- **DO** be sensitive/non-judgemental/practical/supportive/discrete;
- **DO** prioritise safety over work efficiency;
- **DO** allocate some private time and space to listen;
- **DO NOT** seek proof of Abuse;
- **DO NOT** contact the Responding Party;
- **DO NOT** compel the Reporting Party to accept support;
- **DO NOT** tell the Reporting Party to leave the Responding Party; and
- **DO NOT** adopt the role of being a support worker yourself.

Concerns Relating to more than One Player or Staff Member

In cases where the Reporting Party and the Responding Party both work for the Club, the Head of Safeguarding and Welfare will schedule a meeting with the Allegations Management Group to discuss the particulars of the Concern and consider the appropriate next steps in accordance with the Club's Managing Allegations Against Staff Policy.

Concerns Relating to Children

Where a Player or Staff member is affected by or is aware of Domestic Abuse involving a Child, the Concern must be reported to the Safeguarding Team immediately via email at safeguarding@tottenhamhotspur.com. For more information on Concerns relating to Children please see the Club's Safeguarding Children Policy.

Risk Assessment

Once the Safeguarding Team are notified of a Concern, it will conduct a Domestic Abuse, Stalking, Harassment and Honour Based Violence Assessment and Management Model (“**DASH**” risk assessment). A copy of the DASH Risk Assessment can be accessed via: <https://www.dashriskchecklist.com/>

If applicable, the Safeguarding Team will produce a safety plan and refer the Concern to the Human Resources Team if a workplace risk assessment is needed. Any information that is disclosed in this process will be on a need-to-know basis, with the consent of the Reporting Party. Following completion of the DASH risk assessment the Safeguarding Team may undertake any of the following actions:

- referral to the Police;
- referral to the Local Authority regarding risk to general public or vulnerable people, for example Children;
- referral and signposting to independent domestic abuse adviser (IDVA) support services for victims of domestic abuse and their families;
- referral to Multi-Agency Risk Assessment Conferences (**MARAC**), to coordinate the local response to preventing harm; and/or
- recommendations to the Human Resources Team.

Consent will always be sought from the Reporting Party before sharing any information with the Human Resources Team, however the Club will be limited in the protections that it can put in place if the Human Resources Team are not involved. The Club will always seek to agree with the Player or Staff member who is experiencing Domestic Abuse what will be communicated to colleagues, if any changes are obvious and may require explanation.

Support and Adjustments

If workplace adjustments are required or requested, the Safeguarding Team will always refer this to the Human Resources Team who will conduct a risk assessment and work alongside any relevant managers (on a need-to-know basis) to put in place support for the Reporting Party. However, for any workplace adjustments to be implemented the Human Resources Team will require the consent of the Reporting Party. Decisions about what support can be offered will be made on a case-by-case basis, taking into account the needs of the Reporting Party and business requirements.

The Club is committed to offering the following workplace adjustments where possible and appropriate in the circumstances (please note that this is not an exhaustive list):

- a) Paid time off work, up to a maximum of 5 days each calendar year (unless otherwise agreed by the Strategic Safeguarding Lead), to deal with issues such as moving to a safe house, refuge or new home, settling Children into a new school or attending appointments with support providers;
- b) Temporary adjustments to work patterns, hours or duties, as well as temporary flexible working arrangements, including private rooms to take confidential phone calls or a safe car parking space covered by CCTV;

- c) Safe methods of communication (for example, providing a new work email address, telephone number, or discrete code word between trusted Staff members) and diversion of telephone calls and emails from a list agreed with the Reporting Party;
- d) Alterations to finances, for example payment of wages into a different bank account, temporary change to the date on which wages are paid, or a redirection of work-related post, such as in relation to pension arrangements and private medical insurance;
- e) Privacy, including the removal of the Reporting Party's work contact details and photographs from the Club's website and other public platforms operated by the Club and/or an agreed procedure with reception and other key contacts to ensure that details of the Reporting Party's whereabouts during working hours are not disclosed or made accessible; and
- f) Adjustments to disciplinary, capability and absence procedures where Domestic Abuse is a factor in any performance, conduct or absence issues.

The Safeguarding Team will endeavour to ensure that the Reporting Party is protected and reassured and that any immediate harm is prevented and where required reported to the appropriate external agencies.

The Club encourages the Reporting Party to provide the Club with emergency contact details for a trusted friend or family member and to let the Club know if personal information (for example, in relation to work-related benefits provided by the Club) should be updated. If notified to the Human Resources Team, the Club can work with the Reporting Party to form an action plan, for example, if an individual does not arrive at work by a certain time who should be contacted.

Specific Support for Players

Support for Players will follow the same mechanisms as Staff; however, the levels of confidentiality and information sharing may vary. For example, a member of football coaching or administration staff may need to be aware of Concerns at a broad level for team planning purposes. This will also be shared with the consent of the Player disclosing.

If the case is referred to the local MARAC the Club will take all reasonable measures within its control to ensure maximum confidentiality. Lower levels of information sharing at multi-agency level can be requested for high-profile individuals.

Concern Records

All Concerns shall be recorded in writing, and notes on all follow up meetings will be held outside of general Player and Staff personnel records and stored securely via the Safeguarding Team's case management system, Confide.

Section C: Responding Party

Domestic Abuse perpetrated by a Player or Staff will not be condoned under any circumstances nor will it be treated as a purely private matter. The Club recognises that it has a role in encouraging and supporting Players and Staff to address Abuse of all kinds.

Players and Staff are expected at all times to present high standards of personal integrity and will not conduct themselves in a way that may reflect adversely on the Club and its reputation. The Club views Abuse by Players and Staff as a breach of the Club's Code of Conduct.

Where the Responding Party is in a Position of Trust, in Regulated Activity with Children and Adults at Risk, Concerns must be reported to the Head of Safeguarding & Welfare. The Strategic Safeguarding Lead will be alerted and will schedule an Allegations Management Group in line with the Managing Allegations against Staff policy.

Following a Concern relating to Children being reported, the Head of Safeguarding and Welfare will schedule a meeting with the Allegations Management Group to discuss the particulars of the Concern and consider the appropriate next steps in accordance with the Club's Managing Allegations Policy.

Concerns Relating to High Profile Individuals

Where a Concern relates to a High Profile Individual such Concern must be referred to the Strategic Safeguarding Lead immediately. The Strategic Safeguarding Lead will then schedule a meeting with the Allegations Management Group to discuss the particulars of the Concern and consider the appropriate next steps in line with the Managing Allegations Against Staff Policy.

Specific Support for Players

Where there is a risk that the allegation has become known to the press (and is therefore, more likely to be discussed in a press conference) the case will be referred to the Communications Team to assist the Club in managing the allegation.

If the case is referred to the local Multi-agency Risk Assessment Conferences ("MARAC") the Club will take all possible measures to ensure maximum confidentiality.

Concerns Relating to more than one Player or Staff Member

The Club will consider what, if any, investigation may be needed. During any investigation, the Responding Party will have an opportunity to respond to the allegations against them if they also work for us. Where possible, and if it is deemed appropriate following discussion with the Reporting Party, the Club will seek to ensure that it is the Responding Party's, not the Reporting Party's, work arrangements that are changed.

Action may also need to be taken to minimise the potential for the Responding Party to use their position or work resources to find out details about the whereabouts of the Reporting Party. This may include a change of duties or withdrawing the Responding Party's access to certain computer programmes or offices.

Risk Assessment

Once the Safeguarding Team are notified of a Concern regarding the Responding Party, it will conduct a **Risk Assessment** and, if applicable, produce a safety plan and refer the Concern to the Human Resources Team if a workplace risk assessment is needed. Any information that is disclosed in this process will be on a need-to-know basis.

Following completion of the Risk Assessment the Safeguarding Team may undertake any of the following actions with approval from the Strategic Safeguarding Lead:

- referral to the Police;
- referral to the Local Authority regarding risk to general public or vulnerable people, for example Children;
- referral and signposting to support services for perpetrators of domestic abuse; and/or
- recommendations to the Human Resources Team.

Disciplinary Action Against the Responding Party

Any Player or Staff member who is alleged to have committed Abuse may be subject to disciplinary proceedings in accordance with the Club's Disciplinary Policy.

If any Player or Staff member is found to have knowingly assisting the Responding Party in connection with suspected Domestic Abuse may be seen as having committed a disciplinary offence which will be investigated in accordance with the Club's Disciplinary Policy.

Where a Players or Staff members conduct is the subject of a criminal investigation, the Club will not usually await the outcome of any prosecution before deciding what action, if any, to take.

Self-Disclosure

Where a Player or Staff member discloses their Abusive behaviour to the Club, the Club will engage with that individual to identify sources of external help and support. The Club encourages all Players and Staff members to address their Abusive behaviours of any kind and recognise that change may only be possible with the provision of external help. There may be occasions where it is appropriate for the matter to be escalated internally or to an external agency.

Malicious Reporting

In the event that a false allegation of Domestic Abuse is made by a Player or Staff member either maliciously, deliberately or recklessly, the Club will consider what disciplinary action, if any, is appropriate.

Regulatory Requirements

The Club is committed to complying with its obligations arising under the Football Authority Regulations and the any requirements of the Local Authority Designated Officer, subject to any overriding applicable legal obligations.

Concern Records

All Concerns shall be recorded in writing, and notes on all follow up meetings, will be held outside of general Player and Staff personnel records and stored securely via Confide.

Appendix 1 - Definitions and Rules of Interpretation

Definitions

The following definitions apply in this Policy:

“Abuse”	is any form of harm or maltreatment of an individual including Domestic Abuse, Coercive or Controlling Behaviours and Stalking. There are four main types of Abuse: Emotional Abuse, Physical Abuse, Sexual Abuse and Neglect. Other forms of Abuse may include Discriminatory Abuse or Psychological Abuse;
“Adult”	an individual over the age of 18;
“Bullying”	a form of Emotional Abuse whereby an individual is discriminated against;
“Child/Children”	an individual under the age of 18;
“Child Sexual Abuse”	forcing or enticing a Child to take part in sexual activities whether or not the Child is aware of what is happening. The activities may involve physical contact as well as non-contact activities, such as grooming. Child Sexual Exploitation is a form of Child Sexual Abuse;
“Child Sexual Exploitation”	is a form of Child Sexual Abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity usually in exchange for something the Child needs or wants;
“Coercive and Controlling Behaviours”	are a purposeful act or a pattern of behaviours which takes place over time in order for the Person A to exert power to coerce or control Person B. Examples of such behaviour include acts of assault, threats, humiliation and intimidation or other Abuse that is used to harm, punish, isolate, exploit or frighten another person. Coercive and Controlling Behaviours are a type of Domestic Abuse;
“Concern”	fear, worry or concern that an individual may be at risk of Abuse ;
“Cyber Bullying”	is the use of technology to harass, threaten, embarrass, or target another person;
“DASH”	the Domestic Abuse, Stalking and Honour Based Violence Risk Identification, Assessment and Management Model;
“Data Protection Legislation”	all applicable laws relating to data protection, the processing of personal data and privacy, including: the Retained EU law version of the General Data Protection Regulation ((EU) (2016/679)) (“UK GDPR”) and the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as

may be amended by the proposed Regulation on Privacy and Electronic Communications), and any other data protection and/or privacy legislation applicable in the UK from time to time, (each as amended, updated, replaced or re-enacted from time to time and including all subordinate legislation made from time to time under or giving effect to the same) and references to “controller”, “personal data”, “special category data”, “process”, “processing” and “supervisory authority” have the meanings set out in, and will be interpreted in accordance with, such applicable laws;

“Discriminatory Abuse”	including Abuse based on race, sex, disability or other protected personal characteristic as defined in the Equality Act 2010, as well as other forms of harassment, slurs or similar unfair treatment;
“Domestic Abuse”	Abuse which takes place between two individuals aged 16 years or over who are personally connected to each other;
“Economic Abuse”	any behaviour by Person A that has a substantial adverse effect on Person B’s ability to (i) acquire, use or maintain money or other property; and (ii) obtain goods or services;
“Emotional Abuse”	the persistent emotional maltreatment of another such as to cause severe and persistent adverse effects on their emotional development;
“Extremism”	vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs;
“Faith and Honour Based Abuse”	means a collection of practices (including Extremism, Radicalisation and Terrorism) which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour, such Abuse occurs when Person A perceive that Person B has shamed their family and/or community by breaking their honour code;
“Football Authority Regulations”	the rules and regulations from time to time in force under the auspices of The Football Association and/or the Premier League to the extent that they relate or apply to the Club;
“High Profile Individual”	Players, former Players, Club "legends", Club shareholders, the Club’s statutory directors, senior leadership team, senior executives, senior football leads (e.g. the manager of the men’s first team) and those with associated and/or engaged by the Club who are well known in the public domain;

“Neglect”	the persistent failure to meet an individual’s basic physical and/or psychological needs, likely to result in the serious impairment of the individual’s health or development;
“Physical Abuse”	a form of Abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent, or other person with parental responsibility fabricates the symptoms of, or deliberately induces, illness;
“Players”	means all Club players in the men’s senior first team, the women’s senior first team, the academy and the women’s academy;
“Position of Trust”	means roles where the post holder has power and authority and may have key influence in the life of others, this includes but is not limited to coaching staff and medical staff;
“Premier League”	means The Football Association Premier League Limited, or any other successor or replacement competition organiser of the football league matches in which the Club competes;
“Psychological Abuse”	including Bullying, Cyber Bullying, Emotional Abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, Controlling, intimidation, Coercion, harassment, Verbal Abuse, isolation or withdrawal from services or supportive networks;
“Radicalisation”	the process by which an individual comes to support or engage with Terrorism and forms of Extremism which can lead to Terrorism;
“Reporting Party”	means the individual who is Abused, Coerced, Controlled and/or Stalked;
“Responding Party”	Means the individual who is accused of using behaviours to Abuse, Coerce, Control, and/or Stalk someone else;
“Sexual Abuse”	forcing or enticing an individual to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening, without consent. The activities may involve physical contact as well as non-contact activities, such as grooming. Child Sexual Abuse and Child Sexual Exploitation are forms of Sexual Abuse;
“Staff”	any individual acting for or on behalf of the Club in an official role whether as an employee, volunteer, casual workers or staff, consultant or otherwise;
“Stalking”	means a pattern of unwanted, fixated and obsessive behaviour which is intrusive. This can include harassment that amounts to

stalking or stalking that causes fear of violence or serious alarm or distress in another person, which can occur in person or online. Stalking is a type of Domestic Abuse;

“Terrorism”

an action that endangers or causes serious violence to an individual/individuals; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause;

“The Football Association”

means The Football Association currently the governing body of professional association football in England; and

“Verbal Abuse”

means the use of threatening, abusive or insulting language with the intention of causing an individual alarm or distress, or to harass them.

Application of the Policy

This Policy applies to all Players and Staff.

This Policy shall not form part of any contract of employment or contract to provide services.

All Players and Staff under the jurisdiction of the Club agree to abide by all Club policies and procedures as in place from time to time, including this, Policy.

Power to Change, Rescind or Add to the Provisions of the Policy

In the event an issue arises that is not foreseen in this Policy, it will be addressed by the Club in a manner that protects and promotes the objectives identified in this Policy.

The Club is committed to reviewing this Policy periodically which may be amended from time to time by the Club.

Laws

The laws of England and Wales shall apply to this Policy.

Legislation and Guidance

The Club’s approach is based on the principles recognised within UK and International legislation and UK Government guidance and regulations. For the purposes of this Policy, the following have been taken into consideration:

- Domestic Abuse Act 2021;
- Stalking Protection Act 2019;
- Criminal Justice and Courts Act 2015;
- Serious Crime Act 2015;
- Domestic Violence, Crime and Victims Act 2004;
- Crime and Disorder Act 1998;
- Protection from Harassment Act 1997;

- The Human Rights Act 1998;
- Health and Safety at Work etc. Act 1974;
- Infant Life (Preservation) Act 1929; and
- Offences against the Person Act 1861.

Guidance and Regulations:

- Domestic Abuse Act 2021 Statutory Guidance;
- The Domestic Abuse, Stalking and Honour Based Violence (DASH 2009-2023) Risk Identification, Assessment and Management Model;
- The DASH (2009-2023) Risk Checklist;
- DASH (2009-2023) Practice Guidance on Risk Identification;
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013;
- The Management of Health and Safety at Work Regulations 1999;
- Health and Safety (Consultation with Employees) Regulations 1996;
- 10 Principles of an Effective MARAC; and
- Premier League Guidance for Safer Working Practice.

Appendix 2 – Directory Of National Support Services

National Domestic Abuse & Stalking Services		
24-hour National Domestic Violence Helpline	<p>A service for women experiencing Domestic Abuse, their family, friends, colleagues and others calling on their behalf.</p> <p>It is run in partnership between Women’s Aid and Refuge.</p>	<p>0808 2000 247 www.nationaldomesticviolencehelpline.org.uk</p> <p>Callers may first of all hear an answerphone message before speaking to a person.</p>
Women’s Aid	A confidential helpline for women experiencing Domestic Abuse.	helpline@womensaid.org.uk
Men’s Advice Line	<p>A confidential helpline for all men experiencing Domestic Abuse by a current or ex-partner.</p> <p>Caters for all men: whether in heterosexual or same-sex relationships.</p> <p>Offers emotional support, practical advice and information on a wide range of services for further help and support.</p>	<p>0808 801 0327 www.mensadviceline.org.uk</p> <p>Days and times of phone support vary.</p>
Respect Phonenumber	A confidential helpline for people who are abusive and/or violent towards their current or ex-partner. Offers information and advice to support perpetrators to stop their violence and change their abusive behaviours. The main focus is to increase the safety of those experiencing Domestic Abuse.	<p>0808 802 4040 www.respectphonenumber.org.uk</p> <p>Days and times of phone support vary.</p>
Galop	Provides support to LGBT+ people who have experienced a hate crime, Domestic Abuse or sexual violence.	<p>0900 999 5428 help@galop.org.uk</p>
Broken Rainbow	National LGBT Domestic Violence Helpline providing confidential support to all members of the Lesbian, Gay, Bisexual and Trans (LGBT) communities, their family and friends, and agencies supporting them.	<p>0300 999 5428 help@brokenrainbow.org.uk www.brokenrainbow.org.uk</p>

Jewish Women's Aid	Provides support to Jewish women and Children affected by Domestic Abuse.	0808 801 0500
Karma Nirvana	Supports Victims of forced marriage and 'honour'-based violence and abuse	0800 599 9247 www.karmanirvana.org.uk
Man Kind Initiative	The Man Kind Initiative is a national charity that provides help and support for male Victims of Domestic Abuse.	01823 334244
Muslim Women's Network	Provides a confidential listening service for Muslim girls or women.	0800 999 5786
Southall Black Sisters	Advice and information on Domestic Abuse, racial harassment, welfare and immigration, primarily for Asian, African and African-Caribbean women.	www.southallblacksisters.org.uk
National Stalking Helpline	National Stalking Helpline provides information and guidance to anyone affected by harassment or stalking. Our helpline is open 9.30 a.m. – 4 p.m. Monday – Friday (except Wednesday when we open at 1p.m.) We also offer advice via email and on our Forum which can be found on our website.	0808 802 0300 advice@stalkinghelpline.org www.stalkinghelpline.org
Support for Employers & Professionals		
Corporate Alliance Against Domestic Violence	The Corporate Alliance Against Domestic Violence (the Alliance) is the nationally recognized membership charity working with employers addressing the impact of Domestic Abuse in the workplace. The vision at the Alliance is to work with every employer to respond effectively in a business appropriate manner to Domestic Abuse by providing accredited training, consultancy, business appropriate risk assessment, strategic response, support and tools to employers, Human Resources teams and line managers that are proven to save lives.	07917228760 www.caadv.org.uk support@caadv.org.uk

SafeLives	SafeLives is a national charity dedicated to ending domestic abuse. Our experts find out what works to stop Domestic Abuse. We gather evidence, and we spread great new approaches across the UK. We work with everyone who wants to stop domestic abuse.	0117 317 8750 www.safelives.org.uk info@safelives.org.uk
Women's Aid	<p>Women's Aid is the national Domestic Abuse charity that coordinates and supports a network of over 500 local services working to end Domestic Abuse against women and Children.</p> <p>The Women's Aid National Training Centre, an accredited National Open College Network Centre, provides a variety of training and awareness raising courses addressing Domestic Abuse that respond to individual training requirements as well as tailor made training packages for the workplace to suit employers.</p> <p>Women's Aid also runs the UK Gold Book Online which provides up to date information for professionals on services for survivors of Domestic Abuse. A range of information and support services are available on Women's Aid's website including a forum for survivors.</p>	0117 915 7450 www.womensaid.org.uk