



2018

# Alexandra Soccer & Community Association

CS5-REQUIRED-SAFEGUARDING ADULTS AT RISK POLICY  
CS5-REQUIRED-SAFEGUARDING ADULTS AT RISK  
PROCEDURES



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<b>By</b>	<b>Senior Team</b>
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## 1.1 - Vulnerable Adults Policy Statement

The Alexandra Soccer & Community Association is referred to as the Association throughout this policy. The association Trustees and Senior Management, CCO's and staff do hereby strive to provide a 'SAFE' environment for all Children, Young People and Vulnerable Adults to enjoy their personal experience with the company. The Association Trustees and Senior Management, CCO's and staff state that all Safeguarding policies have been adopted.

## 1.2 – Safeguarding Roles and Responsibilities

Alexandra Soccer & Community Association

Senior Safeguarding manager is Andrew Blakemore

Contact telephone number 01270 213014

All safeguarding matters should be referred to Andrew Blakemore

If Andrew Blakemore is not contactable then safeguarding matters should be referred to one of the deputy safeguarding managers.

Callum Carey. Contact telephone number – 07708723932

Ray Walker. Contact telephone number – 07557391426

Nicholas Rimms. Contact telephone number – 07970835347

One of the safeguarding managers will be available between 08.00 and 24.00 24 hours a day every day of the year

### The Role of the Association Safeguarding Manager is to:

Receive all safeguarding referrals directly. In all cases act appropriately on them.

To maintain a confidential safeguarding log of all safeguarding issues and incidents.

To ensure all employees and volunteers working for the community association are fully trained in safeguarding matters and the policy and procedure.

To report any breach of policy or procedures to the manager of the Community Association.

To review the safeguarding policy and procedures at least annually.

To ensure the Community association complies with Premier League rules, EFL, The FA safeguarding agenda and Government legislation.

Maintaining key relationships with the Premier League Safeguarding Team.



Local authority child protection service and the Local Authority Designated Officer. The local authority vulnerable adults protection services. The FA Safeguarding and Case Management teams.

Provide regular reports to Senior Association Management on the effectiveness of the Safeguarding strategy.

To ensure compliance and updates on current legislation and any changes in Premier League, EFL or The FA Rules or statutory agency legislative changes which will impact on the Community Association.

To liaise directly with the safeguarding manager at Crewe Alexandra football club to ensure all safeguarding policies and procedures are compatible and cover all aspects of both the club and the associations work

### 1.3 - Useful Contacts

- Local authority children's safeguarding team.  
0300 123 5012 – 8.30-4.30pm  
Out of Hours – 0300 123 8022
- Local authority Designated Officer. Name and number
- Local authority vulnerable adults protection team. Number
- The Football Association/NSPCC Safeguarding Children & Vulnerable Adults Helpline  
Tel: 0808 800 5000 - Text phone for Deaf Users Tel: 0800 056 0566.
- Affiliated Football's Safeguarding Policy  
<http://www.thefa.com/~media/files/thefaportal/governance-docs/safeguarding/raisingawareness/affiliated-footballs-safeguarding-policy-and-procedures.ashx>
- FA Safeguarding Team - Tel– 0844 980 8200



## 2.0 – Vulnerable adult Protection Policy

### 2.1 - Policy Statement

The Association Trustees and Senior Management, CCO's and staff do hereby strive to provide a 'SAFE' environment for all vulnerable adults to enjoy their personal experience with the company.

All participants should have a positive experience at all times during any activity managed by the Association and its staff. All participants will be treated equitably and with dignity and respect. All our members have a duty to keep vulnerable adults safe and help protect them from physical, sexual, or emotional harm and from neglect and bullying.

The Association Trustees, Board, Staff and Volunteers recognise the importance of Safeguarding and regular reviewing of policies.

The Association Trustees Board members are determined to work together to fulfil all important responsibilities.

### 2.2– Equal Right to Protection

- All vulnerable adults and children have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation.
- The vulnerable adult's welfare is, and must always be the paramount consideration.
- All allegations of abuse will be taken seriously and responded to appropriately
- The Association will work with other organisations, children, young people and vulnerable adults, their parents/carers.

### 2.3 - Key Aims

The Association is committed and understands this policy together with the Vulnerable adults Protection and Best Practice Guidelines set's out the Association's Role and Responsibilities.

The Association aims

- A safe and welcoming environment for vulnerable adults involved in any Community/club activities, free from abuse and fear of abuse in all its forms;
- A culture where safeguarding practice is widely understood, openly discussed and where the workforce recognise the role they play in keeping vulnerable adults, themselves and their colleagues, safe from harm;
- A clear system which promotes and supports: constant vigilance, prevention and early intervention in safeguarding matters, and where necessary, prompt and thorough action in response to any concerns or incidents;



- To implement legislation, Government policy and Premier League, FA and EFL regulations, policy and guidance where necessary; and to work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and young people.

In order to realise these aims we will:

- Work with relevant governing bodies and statutory agencies to ensure we meet all necessary regulations in respect of our safeguarding practice. We will adopt the standards presented in the Governments statutory guidance documents 'Working Together to Safeguard Children' and 'No Secrets';
- Listen to vulnerable adults, take them seriously, and react swiftly and appropriately to ideas, feelings and concerns and address them in a fair, effective and timely manner;
- Develop and communicate a series of clear policies, protocols and guidance designed to help deliver good practice across the Association;
- Maintain a visible presence across all areas of the Community internet platforms;
- Create an effective support network of Safeguarding managers and a senior safeguarding manager;
- Provide an advisory and support mechanism across all areas of the business where children and young people are involved in any Association activity;
- Support the Club's 'Safer Recruitment' philosophy, through an appropriate DBS (Disclosure and Barring Service) vetting protocol, in accordance with legislative and regulatory requirements.
- Develop a consistent and appropriate safeguarding training programme for staff, volunteers, partners and participants;
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with the Data Protection Act.

## **2.4 – Reference**

- Working Together to Safeguard Children (2015)
- Crime and Disorder Act 1998.
- Data Protection Act (1998).
- EFL Guidance to members Clubs and Trusts (2017).
- Human Rights Act (1998).
- Police Act (1997).
- Protection of Freedoms Act (2012).



- Rehabilitation of Offenders Act (1974).
- Safeguarding Vulnerable Groups Act 2006.
- Sex Offenders Act 1997.
- Sexual Offences Act (2003).
- Youth Evidence & Crime Evidence Act (1999).

## 2.5 – Policy Review

The Association Trustees and Senior Management will review Safeguarding on an annual basis. The date of this review will be May 2018. The reviewing process will be carried out by Senior Management and reported to the Association trustees at the next appropriate meeting. A full review of the policy and procedures would be carried out immediately following any major incident or any changes to the organisation's operation or following and legislation changes.

## 2.6 – Definition of a Vulnerable adult at Risk

The Association recognises its commitment to ensuring that all vulnerable adults are protected from harm.

## 2.7 – Policy Applies to

The Association recognise that all policies apply to all staff and volunteers paid or unpaid and Trustees. All Trustees and staff have access to all policies through the 'Staff' handbook and 'Capability' information pack.

## 2.8 – Recognising Abuse & Types of Abuse

### Abuse

A form of maltreatment of a vulnerable adult. Somebody may abuse or neglect a vulnerable adult by inflicting harm, or by failing to act to prevent harm. Vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or a child or children.

### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a vulnerable adult.



## Sexual abuse

Involves forcing or enticing a vulnerable adult to take part in sexual activities that they do not consent to, not necessarily involving a high level of violence, whether or not the vulnerable adult is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging vulnerable adults to behave in sexually inappropriate ways, or grooming a vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual exploitation is also sexual abuse where a person offers some inappropriate incentive in exchange for abusive sexual contact

## Emotional abuse

The persistent emotional maltreatment of a vulnerable adult such as to cause severe and persistent adverse effects on the vulnerable adult's emotional development. It may involve conveying to a vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on vulnerable adult. These may include interactions that are beyond a vulnerable adult's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the vulnerable adult participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of vulnerable adult. Some level of emotional abuse is involved in all types of maltreatment of a vulnerable adult, though it may occur alone.

## Neglect

The persistent failure to meet a vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the vulnerable adult's health or development. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a vulnerable adult from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, vulnerable adult's basic emotional needs.





## Radicalisation

Radicalisation is the process of encouraging someone to develop any radical views. It is not brainwashing which is changing someone's views against their will. It may be about encouraging radical views in any area of life. While currently much thought is about terrorism children and young people can be encouraged to develop radical views about any issue. These might include race, sexuality, gender, age, disability, politics, religion, animal rights, etc.

## Other abuse

Other abuse may include female genital mutilation, forced labour, forced marriage, trafficking, grooming, racial abuse, financial abuse, institutional abuse, bullying, cyberbullying, sexist abuse, abuse around gender, identity and lifestyle and many others.

## Signs of abuse

Signs of abuse can be many and varied. All employees and volunteers will be given safeguarding training in the signs and symptoms of abuse.

Signs can include any physical injury such as bruises, cuts, fractures, bites, burns,

Indirect signs can be unwillingness to undress, excessive clothing, limping, flinching, refusal to return home, wincing, poor attention, low self-esteem.

Any injury which is non-accidental. Any injury with an inconsistent or implausible explanation. Repeat injuries. Inadequate parental concern. Sudden change in behaviour, poor attendance, eating disorder, frozen awareness and social isolation.

Sexualised behaviour, sexually transmitted diseases or, inappropriate sexual knowledge.

Hunger, tiredness, enuresis or encopresis, lack of attention to medical issues, ill-fitting clothes or inappropriate dress, fear,

Signs again are linked to the above e.g. the parent openly demonstrates their disliking of the vulnerable adult by the use of negative and destructive comments aimed at the vulnerable adult. Look for sudden changes in the vulnerable adult's character, sensitivity and crying.

## 2.9 Allegations and disclosures of abuse

All allegations of abuse or suspicions of abuse will be reported directly without discussion or conference to the safeguarding manager without delay.

Any person receiving information about abuse or possible abuse or allegations of abuse or suspicions of abuse or disclosures of abuse will need to act appropriately.

A number of basic responses are vital and various skills and knowledge is needed. When a child or any other person starts to disclose information about abuse of vulnerable adults.



- Stay calm. Act as though it is OK to talk about anything
- Take what they say seriously. Be concerned and sensitive
- Keep an open mind. Vulnerable adults sometimes find it difficult to describe events accurately if they are outside their experience
- Do not stop children talking unless there is a clear reason
- Do reassure vulnerable adults that you will help them
- Do not agree to keep secrets. You have to pass this information on. You can reassure children that the information will be dealt with very carefully.
- **Do not ask any closed, direct or leading questions**
- You may ask a few very general questions if you feel it is necessary
- Do not promise the vulnerable adult anything you cannot deliver. You cannot say you will stop them seeing someone or remove them from home.
- Do reassure the vulnerable adult that others will also work to keep them safe

Information should be recorded in as much detail as soon as possible after the information is received. We should remember that there are three types of information that we can record. Fact, Hearsay or third party information or opinion. Care is needed at all times when recording to be accurate.

Once the safeguarding manager receives the information they will make a decision about what happens next and will not necessarily share this with the referrer.

Any information that suggests significant harm or likely significant harm to any child or vulnerable adult must be referred by the safeguarding manager to the appropriate local authority safeguarding team.

Any allegation of abuse against any worker or volunteer of the Association must be referred by the safeguarding manager to the local authority Designated Officer.

These referrals require a telephone referral immediately and a follow up written referral within 24 hours.

These referrals will also require an entry onto the safeguarding log with an account of the action taken and any subsequent information that may or not be received.

Any safeguarding issue which falls below the significant harm or likely significant harm threshold can be dealt with internally by the safeguarding manager. The safeguarding manager will record details of the incident in the safeguarding log and will record what action they have taken and the outcome of that action.

In the event of a lesser safeguarding issue arising the safeguarding manager will decide whether they need to take some action or whether they can advise another person to take the appropriate action.

## 2.10 – Reference to Internal and other organisational guidance

Internal policies which must also be familiar to all workers and volunteers



- Alexandra Soccer & Community Association Bullying & Harassment Policy (Employment Policy).
- Alexandra Soccer & Association Data Handling and Protection Policy.
- Alexandra Soccer & Association Disciplinary Policy (Employment Policy).
- Alexandra Soccer & Association Equal Opportunities Policy (Employment Policy).
- Alexandra Soccer & Association Grievance Policy (Employment Policy).
- Alexandra Soccer & Association Health & Safety Policy.
- Alexandra Soccer & Association Safeguarding Vulnerable Adults Policy & Procedures.

## Other organisational guidance

- FA Respect Codes of Conduct.
- Premier League Guidance for Safer Working Practice.
- Premier League Rules.
- Working Together 2013

### 2.11 – Codes of Conduct (Staff & Volunteers)

This policy applies to all our Trustees, Staff & Volunteers. All members are bound by their contracts to follow this Code of Conduct.

All Association Trustees, Staff & Volunteers should:-

- Abide by all policies and procedures. Including the safeguarding policy and procedure. Report all safeguarding issues immediately and correctly.
- Show respect for every person at all times. Be ethical and responsible when dealing with our Association finance, products, partnerships and public image.
- Discrimination, harassment and victimisation will not be tolerated. Workers and volunteers must not engage in any such behaviour and must report any such behaviour that they witness to the safeguarding manager. It is abuse.
- Ensure the rights of the child and vulnerable adult are maintained at all times
- Treat all Association equipment with respect and care and protect it.
- Show integrity, enthusiasm and professionalism in the workplace.
- Follow Association dress code at work and at any partnership event.
- We discourage employees from accepting gifts from the public or partners. Any gift received must be reported to the Association manager
- To encourage mentoring throughout.
- To be open to communication and to reply to all relative internal and external communication.

The Association may take disciplinary action against an employee or volunteer if they fail to follow this Code of Conduct.



## 2.12 – Code of Conduct (participants-players, coaches, parents, officials, spectators)

This policy applies to all players, coaches, parents, officials and spectators.

All players, coaches, parents, officials and spectators should:-

- The Association have a zero tolerance policy to discrimination, harassment, abuse and bullying. We expect all person involved with the organisation to abide by this approach
- Respect all community users, players, coaches, parents, officials and spectators, discrimination, harassment or victimization will not be tolerated.
- Conform to all Health & Safety, Data Protection, Safeguarding and all other policies whilst on the Association facilities and beyond.
- To respect the Association facilities and equipment.
- Show integrity, enthusiasm and positive behaviour at the Association facility.
- We discourage employees from accepting gifts from the public or partners.
- To be open and honest with all communication.
- To adhere to all Community administration responsibilities.

## 2.13 – Media and Social Media Policy

### Alexandra Soccer & Community Association Social Media Policy

#### Introduction

Employees of the Association may be able to access social media services and social networking websites at work either through company IT systems or via their own personal equipment

This social media policy describes the rules governing use of social media at the Association. It sets out how staff must behave when using the company's media accounts it also explains the rules about using the company's social media accounts it also explains the rules about using personal social media accounts at work and describes what staff may say about the company on their personal accounts.

This policy should be read alongside other key policies. The Associations' internet use policy is particularly relevant to staff using media

#### Why this policy exists

Social media can bring significant benefits to the Association particularly for building relationship with current and potential customers.

However it's important that employees who use social media within the company do so in a way the enhances the company's prospects

A misjudged status update can generate complaints or damage the company's reputation.

There are also security and data protection issues to consider.

This policy explains how employees can use social media safely and effectively

#### Policy Scope

This policy applies to all staff, contractors and volunteers at the Association who use social media while working no matter whether for business or personal reasons.



It applies no matter whether that social media use takes place on company premises while travelling for business or while working from home.

Social media sites and services include (but are not limited to):

- Popular social networks like **Twitter** and **Face book**
- Online reviews websites like **Reevoo** and **Trustpilot**
- Sharing and discussion sites like **Delicious** and **Raddit**
- Photographic social network like **Instagram**
- Question and answer social networks like **Quora** and **Yahoo Answers**
- Professional Social network like **Linkedin** and **Sunzu**

#### Responsibilities

Everyone who operates a company social media account or who uses their personal social media accounts at work has some responsibilities for implementing this policy.

However these people have key responsibilities:

- The Operations Manager is responsible for ensuring that the Association uses social media safely, appropriately and in line with the company's objectives
- The Operations Manager responsible for proactively monitoring for social media security threats
- The Operations Manager is responsible for working with the Clubs Social Media Manager to roll out marketing ideas and campaigns through our social media channels.
- The Operations Manager is responsible for ensuring request for assistance and support made via social media are followed up.

#### General Social Media Guidelines

##### The power of Social Media

The Association recognises that social media offers a platform for the company to perform marketing stay connected with customer and build its profile online.

The company also believes its staff should be involves in industry conversation on social networks. Social media is an excellent way for employees to make useful connections, share ideas and shape discussions.

The company therefore encourages employees to use social media to support company's goals and objectives.

##### Basic Advice

Regardless of which social network employees are using or whether they're using business or personal accounts on the company time , following these simple rules help avoid the most common pitfalls:

- **Know the social network.** Employees should spend time becoming familiar with the social networking before contributing. It's important to read any FAQs and understand what is and is not acceptable on a network before posting messages or updates.
- **If unsure don't post it.** Staff should err on the side of caution when posting to social networks. If an employee feels an update or message might cause complaints or



offence or be otherwise unsuitable they should not post it. Staff members can always consult the **Social Media Manager** for advice

- **Be Thoughtful and Polite.** Many social media users have got into trouble simply by failing to observe basic good manners online. Employees should adopt the same level of courtesy used when communicating via email.
- **Look out for Security Threats.** Staff members should be on guard for social engineering and phishing attempts. Social networks are also used to distribute spam and malware. Further Details Below.
- **Keep personal use reasonable.** Although the company believes that having employees who are active on social media can be valuable both to those employee's and to the business, Staff should exercise restraint in how much personal use of social media they make during working hours.
- **Don't make promises without checking.** Some social networks are very public, so employees should not make any commitments or promises on behalf of the Association without checking that the company can deliver on the promises. Direct any enquiries to the **Social Media Manager**.
- **Handle complex queries via other channels.** Social networks are not good place to resolve complicated enquiries and customer issues. Once a customer has made contact, employees should handle further communication via the most appropriate channel usually email or telephone.
- **Don't escalate things.** It's easy to post a quick response to a contentious status update and then regret it. Employees should always take the time to think before responding and hold back if they are in any doubt at all.

Use of company social media accounts

Authorised users

Only people who have been authorised to use the company's social networking accounts may do so.

Authorisation is usually provided by the **Social Media Manager** it is typically granted when social media related tasks form a core part of an employee's job.

Allowing only designated people to use the accounts ensures the company's social media presence is consistent and cohesive.

Creating social media accounts

New social media accounts in the company's name must be created unless approved by the **Social Media Manager**.

The company operates its social media presence in line with a strategy that focuses on the most appropriate social network given available resources.

If there is a case to be made for opening a new account; employees should raise this with the **Social Media Manager**.

Purpose of company social media accounts

The Association social media accounts may be used for many different purposes

In general employees should only post updates messages or otherwise use these accounts when that use is clearly in line with the company's overall objectives.

For instance employees may use company social media accounts to:



- Respond to **Customer enquiries** and request for help
- Share **blog posts articles and other content** created by the company
- Share **insightful articles, video, media and other content** relevant to the business but created by others
- Provide fans or followers with **an insight into what goes on at the company**
- Provide **marketing campaigns** and special offers
- Support **new products lunches** and other initiatives

Social media is a powerful tool that changes quickly. Employees are encouraged to think of new ways to use it and to put those ideas to the **Social Media Manager**

Inappropriate content and uses

Company social media accounts must not be used to share or spread inappropriate content or to take part in any activities that could bring the company onto disrepute.

When sharing an interesting blog post, article or piece of content, employees should always review the content thoroughly, and should not post a link based on solely on a headline.

Further guidelines can be found below.

Use of personal social media accounts at work

The Value of social media

The Association recognises that employee's personal social media accounts can generate a number of benefits for instance:

- Staff members can make industry contacts that may be useful in their jobs
- Employees can discover contents to help them learn and develop in their role
- By posting about the company, staff members can help to **build the business profile** online

As a result the company is happy for employees to spend a reasonable amount of time using their personal social media accounts at work.

#### Personal Social Media Rules

Acceptable use:

- Employees may use their personal social media accounts for **work related purposes** during regular hours, but must ensure this is for a **specific reason** (e.g. competitor research). Social media should not affect the ability of employees to perform their regular duties.
- Use of social media accounts for non-work purposes is **restricted to non-work times** such as breaks and during lunch.

**Talking about the company:**

- Employees should ensure it is clear that their social media account **does not represent** Alexandra Soccer & Community Associations views or opinions.
- Staff may wish to **include a disclaimer** in the social media profiles: **The views expressed are my own and do not reflect the views of my employer**

Safe Responsible social media use

- Any Employees using company social media accounts
- Employees using personal social media accounts during company time



### Users must not:

- Create or transmit material that might be **defamatory or incur liability** for the company.
- Post messages, status updates or links to material or **content that is inappropriate**

Inappropriate content includes: pornography racial or religious slurs gender specific comments, information encouraging criminal skills or terrorism or materials relating to cults, gambling and illegal drugs.

This definition inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race , age, sex religious or political beliefs national origin, disability, sexual orientation or any other characteristic protected by law.

- Use social media for any **illegal or criminal activities**.
- Send **offensive or harassing material** to other via social media.
- Broadcast **unsolicited views** on social, political, religious or other non-business related matters.
- Send or post messages or material that **could damage The Association's image or reputation**.
- Interact with the Association competitors in any ways which could be interpreted as being **offensive disrespectful or rude**. (Communication with direct competitors should be kept to a minimum.)
- Discuss **colleagues, competitors, customers or suppliers** without their approval
- Post, upload, forward or link to **spam junk email or chain emails and messages**.

### Copyright

The Association respects and operates within copyright laws. Users may not use social media to:

- Publish or share any **copyrighted software, media or materials owned by third parties**, unless permitted by that third party.  
If staff wish to **share content published on another website**, they are free to do so if that website has obvious sharing or functions on it.
- Share links to **illegal copies** of music, films, games or other software.

## 2.14 – Trips, events and activities

The Association recognises that children and young people can be actively involved in ensuring their own safety. Young people will input into the planning of all residential and day trips, in particular the ground rules for any such activity. The Association believes it can promote self and peer monitoring.

### Parental Consent

- No vulnerable adult will be allowed to participate in any activity without the written consent of parent or carer.
- Consent forms should provide parents / carers with a rundown of all events that will take place within a programme, evening session or on a day trip or residential.





Parents or carers should be given the opportunity to opt out of any activity that they do not wish a vulnerable adult to partake in.

- The Association understands it has a duty to support parents and carers in completing parental/carer consent forms (Appendix E) and communicating information to parents and carers in a way that allows them to make an informed decision on the vulnerable adult's care. Consent forms should be written by the DSO.
- Consent forms are confidential and any information provided on them may not be shared with any other party unless consent has been sought from the parent or carer, the information provided on the consent forms will be stored in accordance with the data protection act 1998. When consent forms are disposed of, it is the duty of the Association to ensure that all information is removed from the computer network as well as paper files being destroyed.

#### Lost child procedure

Any Worker or volunteer who has a lost vulnerable adult should follow the following procedure.

- 1 Stay with the vulnerable at all times until they are reunited with their parent or carer or they are handed formally to the police.
- 2 Make reasonable efforts to locate the parent or carer within the vicinity or by phone.
- 3 If a parent or carer is not located within a reasonable time then the police should be contacted and a safeguarding report should be reported to the safeguarding manager

## 2.15 – Whistle blowing Policy and Procedures

The Association adheres to the whistle blowing policy and procedures that enable staff to raise concerns relating to:

- crime
- a miscarriage of justice
- illegality
- health and safety
- environmental or property damage
- unauthorised use of public funds
- concealing or attempting to cover up any of the above.

This code provides additional information to help the Community Association/Club staff to understand the role of whistle blowing in the context of poor practice and unacceptable conduct and attitudes towards children.

#### When to use the code

The whistle blowing procedures and this code may be used by anyone employed by the Community Association/Club in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a child, young people or vulnerable adults is inappropriate.

Inappropriate conduct includes, but is not confined to:



- bullying or humiliation
- contravening health and safety guidelines
- serious breaches of the school's code of ethical practice
- professional practice that falls short of normally accepted standards
- compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.

### Reasons for blowing the whistle

Staff may be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that children, young people or vulnerable adult are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects children, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the Community Association, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail children, young people or vulnerable adults and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the child and the reputation of the whole 'Association' and Parent Club.

### Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimisation, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable but you can be reassured that whistle blowing procedures addresses these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistle blowing. The Association's solicitor or the local authority legal services can provide you with information about your legal position.



### Confidentiality and anonymity

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The Association Board would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The Association will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistle blowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

### Reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the Community Manager/Company Secretary.
- If the Community Manager/Company Secretary is the subject of your concern, speak to the chair of governors.
- A friend, colleague or solicitor may accompany you to the meeting if you wish.
- Ensure the Community Manager/Company Secretary or Chair informs you of their proposed action and sets a date for a second meeting.
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.
- Process and outcome

The Community Manager/Company Secretary or Chairman will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred. Members of the community staff, including management, may be asked to provide information or advice.

- External advice, for example, from legal or human resources or children's services may be sought.



- A written record of the conduct, established facts and outcome of the inquiry will be kept.
- The whistleblower will be kept informed of the progress of the inquiry.
- The outcome of the inquiry will be one of the following:
  - No poor practice or wrongdoing is established and the case is closed
  - The concern has some substance and the subject of the concern will receive advice and support from the head teacher to improve practice
  - Poor practice or wrongdoing is established and disciplinary proceedings are initiated
  - The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

Whistle blowing that is of a safeguarding nature should be made to the safeguarding manager.

Whistle blowing of a safeguarding nature can also be made to the local authority safeguarding team or the police.

Whistle blowing on matters that are not safeguarding can be made to a member of the board.

## 2.16 – Complaints and Appeals

The Association have a complaints policy and procedure.

Any person connected with the Alexandra Soccer and Community Association can make a complaint.

The Alexandra Soccer and Community Association will treat all complaints in a positive and constructive manner and seek to learn from the experience as well as to address the issues raised.

Any complaints should be made to the Associations complaints manager.

Melvin Bates

Alexandra Soccer and Community Association

Crewe Road, Shavington, Crewe. CW2 5AF

Telephone 07557407851

Upon receipt of any complaint the complaints manager will formally and in writing acknowledge receipt of the complaint to the complainant.

If the complaint is of a safeguarding nature it will be handed to the safeguarding manager who will deal with it as they would any other safeguarding concern but they will also acknowledge receipt of the complaint.

The complaints manager will formally investigate the complaint and will decide what action to take and will take whatever action is appropriate.

If the complaint is of a safeguarding nature the safeguarding manager may have to pass this to the local authority for them to investigate and so may not be able to take any action.



The complaints manager will formally reply in writing to the complainant with the outcome of their investigation and inform them of the action that has been taken.

In the case of a complaint of a safeguarding nature the safeguarding manager may only be able to tell the complainant that the concern has been passed to the local authority.

The complaints manager will endeavour to deal with the complaint within ten days of receiving the complaint or will inform the complainant within this time why they require longer to deal with the issue.

If the complainant is not satisfied with the outcome of the complaint or they wish to complain about the complaints manager they should formally appeal to the chairman of the board in writing within 10 days of receiving the outcome.

Chairman of the board.

Name

Address

The chairman of the board will formally acknowledge receipt of the appeal and will investigate and make a formal reply to the appellant with the outcome of the appeal within a further 10 days.

Alternatively you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice.

Public Concern at Work - 020 7404 6609 - [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk) - [www.pcaw.co.uk](http://www.pcaw.co.uk)

## 2.17 – Safe working Practices guidance

Safe working practices will reduce the risk of safeguarding incidents and will reduce the risk of allegations being made. Safe working practices are additional guidance and should complement policies and procedures and safe recruitment practices.

- All work carried out by the Association should be risk assessed and recorded in writing.
- The association will encourage a culture of giving all children, young people and vulnerable adults time to talk and will create a listening culture.
- Staff and volunteers should not contact any child or vulnerable adult away from the work situation unless this has been disclosed or reported afterwards
- Any lone working should be risk assessed
- Staff and volunteers should be vigilant and aware at all times
- Physical contact. All staff and children will receive training around safe physical contact with others. Staff should report any concerning or unsafe physical contact they witness or any accidental unsafe physical contact that may happen



- Dress and appearance. Staff and volunteers should ensure appropriate dress at all times. All changing and showering areas should be clear and should be supervised appropriately
- Contact with children. Staff should not share their home or private details with children or vulnerable adults with whom they work. This includes photographs.
- Staff attitudes, use or mis-use of authority, staff values and attitudes, confidentiality. Staff must report all concerns around these issues.
- Gifts. Should not normally be accepted and should be disclosed to a manager if they are accepted

## 2.18 – Anti-Harrasment/Bullying Policy

### Definition of harassment and bullying

Harassment is defined as conduct, which is unwanted and offensive and affects the dignity of an individual or group of individuals.

Sexual harassment is defined as “unwanted conduct of a sexual nature, or other conduct based on sex, affecting the dignity of any person at work”. This can include unwelcome physical, verbal or non-verbal conduct.

Bullying is defined as the intention to put a victim in distress in some way.

Bullies seek Power.

Bullying has three key components:

- An advantage of power
- An effect of hurt (or loss)
- An absence of consent

Bullying in its truest form is comprised of a series of repeated intentionally cruel incidents involving the same children or vulnerable in the same bully and victim roles. However bullying can consist of a single interaction. Bullying can be verbal or physical or both.

The Association has a zero tolerance approach to harassment and bullying.

All harassment and all bullying is considered to be serious and will be dealt with as such.

The Association believes that the working environment should at all times be supportive of the dignity and respect of individuals. If a complaint of harassment is brought to the attention of management, it will be investigated promptly and appropriate action will be taken.

Any person can be subject to harassment or bullying and this may involve a range of issues such as

- race, ethnic origin, nationality or skin colour
- sex or sexual orientation
- religious or political convictions
- disabilities, sensory impairments or learning difficulties



- status as ex-offenders
- age
- real or suspected illness
- Gender or identity
- membership of a particular group or interest group

Forms may include:

- physical contact ranging from touching to serious assault
- verbal and written harassment through jokes, offensive language, gossip and slander, sectarian songs, letters and so on
- visual display of posters, graffiti, obscene gestures, flags and emblems
- isolation or non-cooperation at work, exclusion from social activities
- coercion ranging from pressure for sexual favours to pressure to participate in political/religious groups
- intrusion by pestering, spying, following someone
- cyberbullying/harassment through media and social media communication

Bullying or harassment may occur between any person or group of persons and any other person or group of persons. It may be peer on peer or adult on child

Any bullying or harassment issues will be considered as safeguarding issues and should be referred to the safeguarding manager like any other safeguarding concerns.

It may well be appropriate for staff and/or volunteers to provide general guidance and advice to any person found bullying or harassing others. This advice will include telling them to stop and letting them know that what they are doing is inappropriate. In the event of this happening a referral will still be made to the safeguarding manager.

It may well be appropriate to provide support and advice to any child or adult who is the victim of bullying or harassment but a referral should still be made to the safeguarding manager.

### 3.1 – Safer Recruitment Policy and Procedures

It shall be the responsibility of the Association Trustees and Management to implement this policy and to monitor its performance.

It is the responsibility of Managers to ensure that:

- They are familiar with the recruitment policies and procedures, and that they follow them accordingly;
- Staffing levels for the 'Association' departments are determined and authorised;
- All roles have current position descriptions that specify role requirements and selection criteria.

It is the responsibility of the Community/Operations Manager to ensure that:



- All Heads of Department are aware of their responsibilities in the recruitment and selection process;
- Heads of Department are given continuous support and guidance in regards to recruitment and selection issues.

### Pre-Recruitment

The Association seeks to be an equal opportunities employer and will apply objective criteria to assess merit. It aims to ensure that no job application or employee receives less favourable treatment on the grounds of gender, age, ethnicity, nationality, religion, marital status, sexuality or disability. Selection criteria and procedures will be reviewed to ensure that individuals are selected and treated on the basis of their relevant merits and abilities. All employees will be given equal opportunity and, where appropriate and possible special training to enable them to progress both within and outside the organisation. The Association is committed to developing a programme of action to make this policy effective, and will bring it to the attention of all employees.

### Pre-Recruitment Activities

When it becomes necessary to recruit for a position, Managers should carefully consider the requirements for the position, and the key selection criteria including skills, experience and qualifications.

If no position description exists for the available position, or if it requires revising, this is the responsibility of the appropriate Manager. Once the new position description or amendments have been drafted, it should be forwarded on to Company Secretary and, if appropriate, approved by the Board.

### Internal Advertising

Where appropriate, The Association will advertise all vacancies internally.

Exceptions to this rule may occur when:

- The position is of such a specialised nature, and / or appropriate skills are not available within the organisation; or
- There is a need to make a direct appointment or promotion into the vacant position.

Upon receiving approval for the vacant position, Company Secretary will advertise the available position internally. Internal advertisements should include the following:

- Position title;
- Outline of the position;
- Skills required for the role;
- Closing date for applications.

All internal applicants should forward a current copy of their resume, together with covering letter, to the Community Manager for acknowledgement, consideration and processing.

Internal applicants who possess the required skills, qualifications and work-related experience, as specified in the internal advertisement, will be interviewed for the position by the relevant Community Manager or Supervisor.





### External Advertising

Where a position cannot be filled internally or where it is appropriate to conduct an external recruitment campaign, the available position should be advertised through relevant networks, EFL & on relevant websites, and through local employment services.

Volunteer positions will be advertised as widely as deemed reasonable.

All advertisements must be approved by the Company Secretary/Community Manager.

If required, the Community/Operations Manager will prepare an appropriate recruitment advertisement for the position and submit it for review and approval by the relevant Company Secretary. The Community/Operations Manager will administer the placement of the advertisement and monitor applications received

All contact regarding the position is to be directed through the Operations Manager, with all applications marked "Confidential" and posted to the Community Manager.

Letters/emails of acknowledgment should be posted to all applicants prior to the short-listing of final suitable applicants. Short-listed but unsuccessful applicants should be advised that their CV will be retained by the 'Association'/Community Manager for future reference, unless the applicant advises otherwise.

Applicants who do not meet the key selection criteria and are not suitable to be short-listed for an interview should be sent a written letter advising them that their application has been unsuccessful.

### Interviewing and Selection

- All applicants will be interviewed by the Association Community/Operations Manager and Company Secretary present.
- The interview will allow both applicant and employer to explore the applicant's attitude to Child Welfare issues. To explore any past experiences or questions moving forward.
- During interview a relative child related scenario would be explored and relative feedback considered.
- Is there anything the Association should know that could affect them being employed by the Association.

### References

The Association will request 2 references from individuals who are not related to the applicant. All references should be thoroughly checked and verified and any concerns relayed to the FA Child Protection Department for advice and guidance.

### Disclosure and Barring Service (DBS) checks.

As part of the Association's recruitment policy all staff have to have a DBS check. This check would be an Enhanced DBS check carried out through the Football Association. Only a FA Disclosure would be accepted. The DBS Enhanced disclosure tells the Association about an applicants recorded offences. It will indicate whether that person is suitable to work with children.



The 'Association' will wish to have a DBS Enhanced with barred list check to be carried out on all employees and volunteers who have unsupervised contact with children and/or vulnerable adults. These checks would be dealt with by the employing officer.

#### Procedure for dealing with recruitment of ex-offenders

The Association will take into account the 'Rehabilitation of Offenders Act 1974' and only consider offences which are relevant to the care and supervision of children and vulnerable adults. These offences are listed in the Government's Public Protection manual (Persons posing a risk to children) 2009. Where ex-offenders are being considered for employment or voluntary work the recruiters will take additional time to discuss their past offences and the circumstances around these offences in order to gain a full understanding of the situation before making any decision. They will also record these decision making processes and the reason for making the decisions.

#### Appointing Staff & Volunteers

All information provided to the Association via the application, interview, DBS and additional information through qualification evidence will be considered to make an informed decision on whether the applicant gets the job.

#### Post Appointment

If an internal candidate is selected, the Community Manager is required to notify the successful candidate and their Head of Department. If an external candidate has been selected, the Community Manager is to make a verbal offer to the candidate.

To authorise the commencement or transfer of an internal employee, the Manager must notify the Company secretary and provide confirmation of their approval. The Manager should ensure that all recruiting documents are completed and returned to the Company Secretary for filing.

The Company Secretary will prepare a written letter of offer for the successful candidate. The letter of offer and or contract of employment will confirm the start date, salary (if any), position and the terms and conditions of employment pertaining to the employee.

Once the Company Secretary or Community Manager has received the candidate's signed letter of offer, the Community Manager is to notify all unsuccessful candidates. If an external recruitment agency has been used, the Manager is to notify the agency, who will notify the unsuccessful candidates.

The Manager is responsible for liaising with the Company Secretary to ensure that the necessary documentation, equipment and access privileges are prepared for the new employee.

The Community Manager will forward an Induction pack to the new employee for their completion and also:

- The Association Community Manager creates a Personal file (which is kept in secure). This will have all the applicants' information at hand. DBS number is requested by all partners/schools etc.
- New staff and volunteers given a Staff Handbook to sign up to all the Association policies and procedures.



- Staff inductions are arranged.

### 3.2 – Partner and External Organisation

If the Association employees work for any partner organisation we will obtain a copy of their safeguarding policy and assess that and work to their policy. Work carried out for another organisation on their premises would require safeguarding reporting to their safeguarding manager. Work carried out for another organisation on the associations premises would require safeguarding reporting through the associations safeguarding policy.

Work carried out on a regular basis with partner organisations would require the association to set up a service level agreement which identified the appropriate safeguarding policy, procedures and reporting. See SLA – 3.2 - Appendix 1

Safeguarding concerns about a child or vulnerable adult from a partner or external organisation passed to the association safeguarding manager would require a reporting decision to be recorded in full in the safeguarding log.

### 4.0 – 5.0 Safeguarding Awareness

All employees and volunteers with unsupervised contact with children and vulnerable adults will receive a basic induction to the work which will include an introduction to the safeguarding policy and procedures. This will be recorded and signed in their personnel file.

All employees and volunteers with unsupervised access to children and vulnerable adults will receive a training course in safeguarding during their induction period. As a minimum this will be the standard Football Association safeguarding award. This will be repeated as a refresher at least every three years. Content of the course includes understanding safeguarding, definitions of abuse, signs and symptoms of abuse and reporting policies and procedures. See Attached induction and training course schedule and content.

All safeguarding manager will take a standard Football Association safeguarding award which will be repeated at least every three years and will also take an advanced safeguarding training course. As a minimum this will be the Football association advanced safeguarding training course. This will also be repeated at least once every three years.

The association will also provide all employees and managers with other specialised safeguarding training as required.

### 6.0 – Guidelines Report & Recording Concerns

All safeguarding must be reported directly to the safeguarding manager. This should be done as soon as possible verbally and followed up by written completion of a safeguarding reporting form. See below

#### 6.1 – Safeguarding referral form

Form Safeguarding 1 should be used by any person referring every safeguarding concern to the safeguarding manager. It should be sent directly to the safeguarding manager and



should be completely confidential in that only the referrer and the safeguarding manager should see the information.

In the event the safeguarding manager receives a safeguarding concern in any other format then the safeguarding manager would fill out a safeguarding 1 form.

The Safeguarding 2 form would be completed by the safeguarding manager as a record of what action they have taken and what outcomes have occurred. Also of any follow up action required or any on-going issues requiring further work by the safeguarding manager.

Forms Safeguarding 1 and Safeguarding 2 will be retained in a file and will form the Safeguarding log which will be completely confidential to the safeguarding manager/s. The log will be kept in a locked cupboard in an agreed office.



**Alexandra Soccer and community Association. Safeguarding form 1**

**For use by any person employed by the association or any volunteer working for the association**

**Referrer's Name address and contact phone number**

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**Full details of the safeguarding concern.**

**A brief description of the concern, allegation, suspicion of abuse or actual abuse.**

**Full details of every person involved including names, addresses, contact details, relationships, Parents details if applicable, Details of any other professionals involved, plus any other relevant details including times, dates, details of where the incident or alleged incident took place and any other information that you consider to be relevant.**

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**Details of any actions taken. Details of any person informed. (Please note policy section 2.9)**

--

**Print name, sign and date this form below**

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**Alexandra Soccer and community Association. Safeguarding form 2**

**For use by the safeguarding manager only.**

**Further information gathered by safeguarding manager**

**Action taken by safeguarding manager**

**Outcomes**

**Further action required by the safeguarding manager or others in relation to this concern**

**Other issues requiring further work**



## 6.2 – Dealing with allegations against staff

Any allegation against any member of staff or any volunteer of a safeguarding nature must be reported to safeguarding manager.

The safeguarding manager will decide if this is an allegation of abuse or harm against a child or a vulnerable adult.

Allegations that do not constitute abuse or harm to a child or vulnerable adult can be passed to the appropriate Community Association manager and can be dealt with informally or formally as is required.

When an allegation of abuse or harm to a child or a vulnerable adult has been received the Safeguarding manager will immediately report this to the Local Authority Designated Officer. Allegations of abuse or harm that constituted an emergency would be reported to the police if they were received out of office hours.

Harm is defined as any person who has;

- behaved in a way that has harmed a child or vulnerable adult, or may have harmed a child or vulnerable adult;
- possibly committed a criminal offence against or related to a child or vulnerable adult; or
- behaved towards a child or children or vulnerable adult in a way that indicates they may pose a risk of harm to children or vulnerable adults.

The safeguarding manager will discuss the allegation with the Local Authority Designated Officer. The designated Officer will then deal with any safeguarding or protection investigation including reporting to the police that they consider necessary. The Safeguarding manager will have a discussion with the Designated officer and jointly decide what action needs to be taken by the Alexandra Soccer and Community Association. They will jointly agree if the worker or volunteer needs to be suspended from their duties.

If the Safeguarding manager and the local Authority designated Officer decide that suspension from duty is appropriate then the Community Association will suspend them from duty. In which case the suspended person will be told not to have any contact with any worker, staff member or volunteer and no clients or service user until further notice. This suspension will be until the investigation by the local authority and the police if relevant is completed. At this point the suspension can be reviewed and revoked if appropriate by the Community Association.

Once the investigation is complete it may be that further disciplinary action needs to be taken against the member of staff or volunteer. The Community Association officers will take advice from the local Authority Designated Officer and the safeguarding manager prior to completing this. If any worker or volunteer is dismissed from post for causing harm to any child or vulnerable adult the Safeguarding manager will refer this matter to the DBS.



### 6.3 – Advice from and notification to the football authorities

The association and any employee or volunteer may approach the Football Association safeguarding helpline for guidance but will not report any specific concerns to them as these must always be passed directly to the Association safeguarding manager.

The Association safeguarding manager will report to the Football Association all serious safeguarding issues so that they are aware of these. However this report will not contain any details and will not include any confidential information. The report will not be made without the permission of the local authority investigating officers if it has concern has been passed to them for investigation.

The association will report all issues that involve the dismissal of a worker or a volunteer to the football authorities or any cases that are likely to bring the football authorities into disrepute.

### 6.4 – Project specific procedures

Any other project undertaken by the Association or by employees of the Association that require additional safeguarding arrangements to be put in place will require a separate written risk assessment and a separate written statement which must be shared with all relevant employees and volunteers

### 6.6 – Confidentiality

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. They should never use confidential or personal information about a child or young person or his/her family for their own or others' advantage.

Information must never be used to intimidate, humiliate or embarrass children or young people.

Confidential information about a child or young person should never be used casually in conversation, or shared with any person other than on a need to know basis.

In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Club's





Safeguarding Manager. Any media or legal enquiries should be referred to the Company Secretary or, in their absence, to their deputy.

The storing and processing of personal information about children is governed by the Data Protection Act, 1998. For further information on the Association's (and your) obligations under the Data Protection Act 1998, please see the Community Associations/Club's Data g & Protection Policy, available in the Staff Handbook.

This means that employees, workers, consultants, agency staff and volunteers:

- Are expected to treat information they receive about children/young people/vulnerable adults in a discreet and confidential manner;
- Should seek advice from the Board of Trustees, Company Secretary or Association and/or Club Safeguarding management if they are in any doubt about sharing information they hold or which has been requested of them.