

Safeguarding Adults at Risk Policy

Review Cycle	Annual Review	Version 2
Policy Last Reviewed	November 2018	By Kim Realff - Designated Safeguarding Officer
Policy to be reviewed again	November 2019	By Kim Realff - Designated Safeguarding Officer



**This policy has been accepted by the Chairman and Board of
Burton Albion Community Trust**

Community Manager

Signature:

Name:

Date:

**Representative from the Board of Trustees of Burton Albion
Community Trust responsible for Safeguarding matters**

Signature:

Name:

Date:





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BACT STATEMENT

Burton Albion Community Trust operates an adult at risk centred approach to safeguarding and where concerns about the welfare of an adult exist, staff will always act in the best interests of the adults at risk.

BACT fully acknowledges and accepts its responsibility for the well-being and safety of all adults at risk engaged in Trust activities. It is the duty of all staff working at BACT to ensure they safeguard adults at risk by creating an environment that protects them from harm. Burton Albion Community Trust believes that the general wellbeing, welfare, and safety of all adults at risk engaged in Trust activities is of the utmost importance. BACT will fulfil its responsibilities by ensuring it displays best practice in safeguarding matters, carried out in a spirit of partnership and openness with the adults at risk, family and the relevant local authority.

BACT SAFEGUARDING CONTACTS



Trustee Representative

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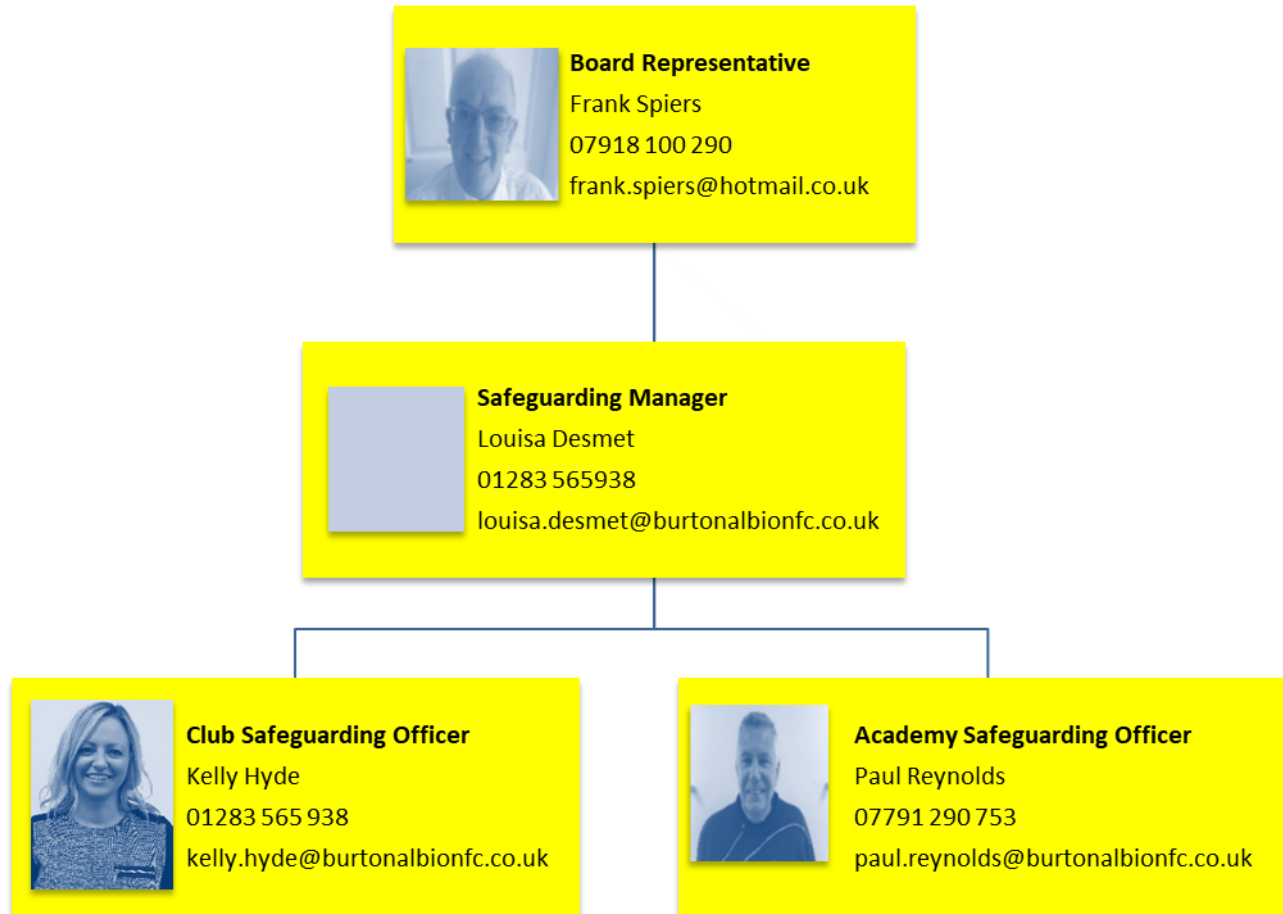
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BAFC SAFEGUARDING CONTACTS



INTRODUCTION

All adults at risk have the right to live their lives to the fullest potential, to be protected, to participate in and enjoy any activity, and to be treated with dignity and respect.

Burton Albion Community Trust (BACT) has both a moral and legal obligation to ensure a duty of care for adults at risk across all its services. We are committed to ensuring that all adults at risk are protected and kept safe from harm whilst engaged in services organised and provided by BACT.

This policy is for use throughout BACT and is to be observed by all those working with adults at risk whether employed by BACT or not. The application of this policy and its procedures is not discretionary. All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of abuse or poor practice.

It is through the application of this policy and our procedures that BACT will seek to develop a positive and proactive welfare programme. This ensures that all adults at risk are able to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving adults at risk.

All staff (the term 'staff' is used to refer to employees, trustees and volunteers and anyone working on behalf of, delivering a service for or representing BACT) must make themselves aware of BACT's Safeguarding Adults at Risk Policy and where appropriate their work with adults at risk will be supported by a safeguarding training programme. The Senior Safeguarding Manager for BACT is Trustee Phil Pusey and the Designated Safeguarding Officer (DSO) is Kim Reaff.

This policy has regard to The Care Act (2014) – Statutory Guidance and The Mental Capacity Act (2005). This policy is in keeping with Staffordshire County Council's (SCC) policies and procedures and reflects what SCC considers to be safe and professional practice. Safeguarding adults at risk must be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Care Act (2014) and Mental Capacity Act (2005).

Activities included under the remit of this policy include:

- BACT
- All other activities associated with Burton Albion Community Trust in which adults at risk are engaged.

Statutory guidance defines an adult at risk as being any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or maybe unable to take care of him / herself or unable to protect him / herself against significant harm or exploitation.

AIMS & KEY PRINCIPLES

BACT will aim to comply with its duties by:

- Respecting and promoting the rights, wishes and feelings of adults at risk.
- Raising the awareness of the duty of care responsibilities relating to adults at risk throughout BACT.
- Promoting and implementing appropriate procedures to safeguard the well-being of adults at risk to protect them from harm.

- Creating a safe and healthy environment within all our services, to protect all parties and reduce the risk of abuse or allegations of abuse from occurring.
- Recruiting, training, supporting and supervising staff to adopt best practice to safeguard and protect adults at risk from abuse and to also minimise any risks to themselves.
- Responding promptly to any suspicions or allegations of misconduct or abuse of adults at risk in line with the Staffordshire and Stoke-on-Trent Adult Safeguarding Partnership (SSAP) policies and procedures.
- Reviewing and evaluating this policy and procedures on an annual basis or in line with best practice, changing legislation, organisational requirements and service delivery.
- Ensuring representatives of BACT who have contact with adults at risk are subject to safer recruitment procedures. This is also applicable for when BACT is working in partnership with other private, voluntary or contracted organisations and employees.

This policy and supporting procedures are based on the following principles:

- The welfare of adults at risk is the primary concern.
- All adults at risk irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and / or sexual orientation have the right to protection from abuse and harm.
- Each adult at risk has a right to be consulted about actions taken by others on his / her behalf in an appropriate way. The concerns of adults at risk and their families should be listened to and consideration given to their understanding and wishes and feelings. However, it may not always be possible to respect an adult at risk's request for confidentiality. If an adult at risk may be at risk of significant harm, there is a duty on BACT to share this with the SSAP. This will be explained to the adult at risk or family member / carer and appropriate reassurance given.
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned unless the disclosure of confidential personal information is necessary to protect an adult at risk or promote their welfare. In all instances, information must be confined to those people directly involved in the professional network of each individual adult at risk and on a strict 'need to know' basis.
- Communication with adults at risk or their families / carers should be jargon free.
- It is everyone's responsibility to report any concerns about abuse in order that prompt action can be taken if required.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
- Adults at risk / families / carers involved with BACT will be advised about this safeguarding policy by publishing it on our website at www.burtonalbioncommunitytrust.co.uk.

PROCEDURE GUIDE

This set of procedures and guidelines sets out how BACT will implement the Safeguarding Children Policy. It is to be used by all staff that come into direct contact with those who fall under the definition of the procedure, or those who are responsible for managing services that affect these individuals or groups.

The procedure guide is intended to be used in conjunction with the policy document, and other supporting individual service procedures. See **Appendix A** for the procedure guide.

LEADERSHIP

The Board of Trustees and Head of Community is accountable for ensuring the effectiveness of this policy and BACT compliance. The Board of Trustees has a named champion for Safeguarding, this is **Phil Pusey** who is the Senior Safeguarding Manager (SSM).

The DSO ensures the policies and procedure in place are robust and monitored and non-compliance is shared with the Head of Community and Board of Trustees.

The Head of Community has appointed **Kim Realff** as the Designated Safeguarding Officer (DSO).

The Head of Community ensures the post holder has the time and resources required to fulfil the duty.

The duties of the DSO and SSM are outlined in the Keeping Children Safe in Education 2018 (DfE) and have been added to each Job description. The Head of Community and Trustees are confident that the DSO and SSM have the knowledge, understanding to carry out their roles appropriately.

The Head of Community ensures that the DSO understands they have the responsibility in leading safeguarding and child protection across BACT. This individual has the appropriate status, authority, funding, resources, training and support to provide advice and guidance to all staff members within BACT on child welfare and child protection. The DSO receives appropriate training and regular supervision.

The SSM and Trustees ensures that any areas of concern in safeguarding are identified and an action plan or risk assessment is developed. The DSO ensures BACT contributes to inter-agency working in-line with Working Together to Safeguard Children (2018).

SAFER RECRUITMENT & DISCLOSURE

When recruiting staff, BACT follows safer recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act.

As part of BACT's safer recruitment process, offers of work in positions which involve working with adults at risk are subject to a satisfactory and appropriate level of an Enhanced DBS check, in line with government practice, two appropriate references and appropriate qualifications being verified. All requests for DBS clearances are routed via The FA who are an umbrella body registered with the DBS. All offers of work are subject to the outcome of the screening process and until a satisfactory Disclosure Certificate has been received and produced when requested, the member of staff will not commence employment.

Should an individual's DBS Disclosure reveal any relevant convictions (in line with the latest legislation Protection of Freedoms Act 2012) BACT must consider whether the nature of the offence / offences renders the person concerned unsuitable for working with adults at risk. In such circumstances a risk assessment will be carried out by the Head of Community and Designated Safeguarding Officer to assess the information contained within the disclosure certificate. The applicant will also be asked to attend a face to face interview prior to a recruitment decision being made.

All new staff who will be working with adults at risk at BACT will be required to complete a self-declaration on commencement of duties and are required to inform BACT of any changes in circumstances that may relate to their DBS status.

RECRUITMENT OF EX-OFFENDERS

- BACT assesses applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks which are processed through the Disclosure and Barring Service (DBS). BACT complies fully with the code of practice and undertakes to treat all applicants for positions fairly.
- BACT undertakes not to discriminate unfairly against any subject of a criminal record check based on a conviction or other information revealed.
- BACT can only ask an individual to provide details of convictions and cautions that BACT are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).
- BACT can only ask an individual about convictions and cautions that are not protected.
- BACT is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical / mental disability or offending background.
- BACT actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.
- BACT select all candidates for interview based on their skills, qualifications and experience.
- An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
- BACT ensures all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
- BACT also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, BACT ensures that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- BACT makes every individual who is subject of a criminal record check aware of the existence of the code of practice and makes a copy available on request.
- BACT undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

<https://www.gov.uk/government/publications/dbs-code-of-practice>

<https://www.gov.uk/government/collections/dbs-filtering-guidance>

EQUALITY AND DIVERSITY

It is the policy of BACT that no person, whether job applicant, staff member, participant or customer shall be discriminated against. BACT opposes all forms of unlawful and unfair discrimination, either direct or indirect, or harassment, on the grounds of the following: Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity Race, Religion or Belief, Sex and Sexual Orientation.

A copy of BACT's Equality and Diversity Policy is available from bact@burtonalbionct.org

SAFE WORKING PRACTICES

There is a comprehensive staff code of conduct in place titled the Brewers Way and in addition, staff are also required to sign a separate code of conduct relating to safeguarding adults at risk. This can be found in **Appendix B**.

A copy of the Staff Handbook is available upon request from bact@burtonalbionct.org

SINGLE CENTRAL REGISTER

BACT shall maintain a Single Central Register of all safe recruitment checks carried out in line with statutory requirements. The DSO will check the Single Central Register on a regular basis and report accuracy and actions to BACT board. The Single Central Register will also be submitted to the Premier / English Football League upon request.

DBS REFERRALS

BACT is under **legal** obligation to make a Safeguarding Referral to the Disclosure and Barring Service (DBS) if person is dismissed or removed from regulated activity (or may have been had they not left) because they have harmed or posed a risk of harm to an adult at risk. The DBS's role is to make barring decisions about people who are referred to it (usually following an employer's disciplinary process), with the possible consequence of the person being barred from working or volunteering with adults at risk. The DBS uses a fair, thorough and consistent process that ensures that the decision it reaches is both proportionate and appropriate to the risk the person poses to adults at risk. The DBS's website is www.homeoffice.gov.uk/DBS and provides a range of materials to help when considering or making a referral. This includes a Referral Form, Referral Guidance, FAQs and a series of Fact Sheets. Information and advice about making a referral can also be found by contacting the DBS Helpline on 01325 953795.

Referral to the DBS will be considered by the DSO in conjunction with the Head of Community.

Referrals to the DBS will be made by the DSO.

INFORMATION SHARING & CONFIDENTIALITY

It's important to ensure an adult at risk understands their personal information will be treated respectfully and confidentially. This provides a safe space for them to be open and honest with the

people caring for them. Establishing this form of trust is fundamental for the provision of safe and effective care. But when working with adults at risk, it's important to keep in mind two essential factors:

- Timely information sharing is key to safeguarding and promoting the welfare of adults at risk. It enables intervention that crucially tackles problems at an early stage.
- If an adult at risk is at risk or suffering significant harm, the law supports you to share information without consent.

Sharing information will help other professionals who have contact with the adult at risk to better understand the risks faced by the adult at risk.

For example, staff could have information about issues related to a parent or other adult which may be impacting negatively on the adult at risk's wellbeing. This information should be shared with the DSO as it will contribute to building a clear picture of the adult at risk's life. The better the picture, the more quickly appropriate action can be taken to protect an adult at risk.

PARTNERSHIP AGREEMENTS

Delivery partners will follow their own safeguarding procedures and are aware of the safeguarding procedure of their partner organisation.

Where safeguarding concerns are raised the appointed designated safeguarding officer of the relevant organisation will inform the designated safeguarding officer at the partner organisation of developments.

Partner organisation will review each other's safeguarding policies and procedures and should be satisfied that they are fit for purpose.

INDUCTION

All staff are required to sign to say that they have read and understand this policy.

Newly appointed staff have a robust induction into the safeguarding procedures operated by BACT when they join the company. Staff may attend further safeguarding training where appropriate and the DSO will maintain records of all safeguarding training accessed by staff.

The DSO will attend appropriate training at least every 2 years to maintain continuous professional development and comply with statutory guidance. The DSO will cascade relevant safeguarding information to staff.

DATA PROTECTION

BACT's Data Protection Policy is currently undergoing a review to reflect recent changes to legislation.

A copy is available on request from bact@burtonalbionct.org

USE OF PHOTOGRAPHY & FILM IMAGES

All images are taken by BACT staff who have been briefed by the DSO. Before taking images of adults at risk, consent is sought in writing at the start or prior to the event by the adult at risk or carer. A copy of this consent form is attached at **Appendix C**.

BACT staff are briefed on the following:

- Adults at risk / parents / carers are responsible for informing BACT of any change of circumstances within the season that may affect consent.
- All adults at risk featured in BACT publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific adult at risk.
- No images of adults at risk featured in BACT publications will be accompanied by personal details such as their home address.
- Recordings of adults at risk for the purposes outlined in the consent form attached as **Appendix C** are stored safely and securely at BACT's premises.
- Any instances of inappropriate images should be reported to the Designated Safeguarding Officer.

SOCIAL NETWORKING GUIDANCE

BACT recognises that social media and social networking services provide opportunities to effectively communicate with a wide range of audiences in a positive manner. However, BACT is also aware of the potential safeguarding risks, especially to adults at risk when using these forms of media. Social networking is referenced within the Staff Handbook.

Staff Handbook can be made available upon request at bact@burtonalbionct.org

RECOGNITION OF ABUSE INCLUDING NEGLECT AND BULLYING

It is important to remember that many adults at risk will exhibit some of these signs and indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death, or the birth of a new baby in the family, relationship problems etc. However, you should always report anything that causes you to suspect that abuse may be happening and for appropriate action to be taken to ensure the welfare and safety of adults at risk.

Recognising Abuse

Recognising abuse is not easy, and it is not the responsibility of staff to decide whether abuse has taken place or if there is significant risk. Staff do however have a responsibility to act if they think it may be happening.

Abuse, including neglect are forms of maltreatment of an adult at risk. Somebody may abuse an adult at risk by inflicting harm or by failing to act to prevent harm. Adults at risk may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by another adult / adults.

Types of Abuse

There is no single, universally accepted, definition of abuse in relation to adults who need care and support. Abuse is:

'A single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an adult who needs care and support'.

The list below outlines the main forms of abuse that can affect adults who need care and support and sets out some of the signs that may indicate that an adult who needs care and support is being abused. Adults can be affected by more than one type of abuse at any one time.

These signs alone do not always mean that abuse is taking place. However, where such signs are apparent it is always advisable to consider this possibility and, if you are not sure what to do, always share your concerns with the DSO.

Physical Abuse

Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Domestic Abuse

Psychological, physical, sexual, financial, emotional abuse; and so-called 'honour' based violence.

Sexual Abuse

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

Psychological Abuse

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

Financial or Material Abuse

Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern Slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory Abuse

Forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability or sexual orientation.

Organisational Abuse

Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the policies, processes and practices within an organisation.

Neglect and Acts of Omission

Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services. Withholding of the necessities of life, such as medication, adequate nutrition and heating. Any doubts on whether or not an act or omission is abusive should be checked with the DSO.

Self-neglect

Covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

The above is not an exhaustive list of forms of abuse and staff must consider other possibilities in line with local multi-agency safeguarding procedures and policies; these may include:

- Hate crime
- Mate crime
- Human trafficking
- Harassment
- Female Genital Mutilation
- Dowry Abuse
- Radicalisation (Prevent Policy 2014)

Honour Based Abuse (HBA)

Honour Based Abuse (HBA) is an internationally recognised term describing cultural justifications for violence and abuse.

What is Honour-Based Abuse?

The concept of 'honour' is for some communities deemed to be extremely important. To compromise a family's 'honour' is to bring dishonour and shame and this can have severe consequences. The punishment for bringing dishonour can be emotional abuse, physical abuse, family disownment and in some cases even murder.

In most honour-based abuse cases there are multiple perpetrators from the immediate family, sometimes the extended family and occasionally the community at large. Mothers, sisters, aunts and even grandmothers have been known to be involved in the conspiring of honour crimes.

Forced Marriages (FM)

A Forced Marriage (FM) is one where one of the partners (more often the woman, but not exclusively) is forced or coerced into marrying another. The force or coercion may be by direct or indirect threats, actual physical force or by psychological intimidation. Forced marriage is an abuse of human rights. For further information and advice, staff can access www.fco.gov.uk/forcedmarriage

Race and Racism

Adults at risk from black and minority groups could potentially have experience harassment, racial discrimination and institutional racism. Although racism causes significant harm it is not a category of abuse.

Grooming

Grooming is when someone builds an emotional connection with an adult at risk to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking.

Adults at risk can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female and could be any age.

Many adults at risk and young people don't understand that they have been groomed or that what has happened is abuse

Online abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Adults at risk may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Adults at risk can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be a part of abuse that is currently taking place in the real world (for example bullying or grooming) or it may be that the abuse only happens online (for example adults at risk to take part in sexual activity online).

Adults at risk can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Bullying and Cyber Bullying

Bullying may not stand alone it may have many aspects to it inclusive of emotional and physical abuse. Bullying takes many forms and all allegations and instances must be reported so that action can be taken and strategies put in place to help the adults at risk recover and the perpetrator to change their behaviour via education and rehabilitation. The increase in use of social networking sites and other cyber related communications systems are highlighting another area of bullying rapidly on the increase.

It can happen anywhere – at home or online. It's usually repeated over a long period of time and can hurt an adult at risk both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. An adult at risk can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Preventing Radicalisation

BACT will ensure that all staff adhere to the duties in the Prevent Guidance 2015 to prevent radicalisation. This will be done by:

- establishing mechanisms to understand the risk of radicalization
- ensure that staff understand the risk and build capability to deal with the issues arising
- communicate the importance of the duty
- ensure that staff implement the duty.

All staff will receive awareness raising and training in preventing extremism and radicalisation.

Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

BACT values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils / students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. BACT is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

BACT seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo-Nazi / White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015)

Reporting Non-Recent Abuse

It is never too late to report the abuse!

Adults often report non-recent abuse to stop the offender abusing others. Some feel that reporting gives them a greater sense of closure.

Deciding on when or whether to report can be very difficult. A person should never feel forced to take any action that they do not feel comfortable with.

If a person does decide to report, they will be supported throughout the process. Procedure attached as **Appendix D**.

The more information that can be provided, the better, such as the alleged victims' name and contact details, the name of the alleged perpetrator and the location and (approximate) dates that the abuse took place.

Reporting to the Police

Reporting abuse can be made directly to the police regardless of how long ago it happened. For example; if a person is the victim of childhood sexual abuse and they decide to report this to the police:

- Firstly, contact the local police on the UK wide non-emergency number 101 and briefly explain what the person is calling about.
- The call will be put through to a specifically trained officer such as a sexual offences liaison officer (SOLO) who will take an initial statement.
- The SOLO will arrange a time and place that the person feels comfortable with, to take a more detailed statement.
- Personal details will be treated sensitively and will not have to face the alleged offender.

What happens next?

- The role of the police is to investigate the crime and recover evidence.
- The role of the Crown Prosecution Service is to decide if there is enough evidence to prove the abuse occurred 'beyond reasonable doubt'.
- Even if there is little evidence it might be taken to court if there is a concern for public safety.

The process will not be a short one, but the police will update victims of the developments.

RISKS THAT INCREASE THE LIKELIHOOD OF ABUSE HAPPENING

There are certain situations and factors that put people at risk of abuse. If one or more of these factors are present, it does not mean that abuse will occur, but it will increase the risk:

- Isolation
- Living in the same household as an abuser
- A previous history of abuse
- The existence of financial problems
- A member of the household experiences emotional or social isolation
- Inappropriate physical or emotional environment e.g. lack of privacy and / or personal space
- Where there has been a change of lifestyle e.g. illness, unemployment or employment
- Dependence on others for personal and practical care
- Where a person is dependent on other people to administer money or where several people manage their money
- Where the vulnerable person exhibits difficult and challenging behaviour
- The carer has difficulties such as debt, alcohol or mental health problems
- Poor leadership in care services
- Unmonitored provision of care e.g. where reviews or inspections do not take place
- Failure to comply with standard operating policies and procedures

RESPONDING TO DISCLOSURE, SUSPICIONS & ALLEGATIONS

Staff may come across cases of suspected abuse either through direct or indirect contact with adults at risk. It is not a staff member's responsibility to decide whether an adult at risk has been abused. It is however their responsibility to act immediately on any such suspicions and report their concerns.

It is also vital that any relevant information is passed in the first instance to the DSO or in their absence, the Head of Community. Any information should be recorded within BACT's Safeguarding Adults at Risk Disclosure and Initial Concerns Form which can be found at **Appendix E**. This should be emailed / delivered to the DSO.

RESPONDING TO DISCLOSURE

Abused adults at risk are more likely to disclose details of abuse to someone they trust and with whom they feel safe. By listening and taking seriously what the adult at risk is saying staff are already helping the situation.

The following points are a guide to help staff respond appropriately:

DOS & DON'TS	
Do's	Don'ts
<ul style="list-style-type: none"> • React calmly so as not to frighten them. • Take what the person says seriously, recognising the difficulties inherent in interpreting what is being said by a person 	<ul style="list-style-type: none"> • Dismiss the concern. • Panic. • Allow your shock or distaste to show. • Probe for more information than is offered.

<p>who has for example a speech impairment and / or differences in language.</p> <ul style="list-style-type: none"> • Avoid asking leading or direct questions other than those seeking to clarify your understanding of what the person has said. They may be subsequently formally interviewed by the Police and / or SSAP and they should not have to repeat their account on several occasions. The first person told may become a witness at court if they have asked / gained direct relevant information. • Reassure the adult at risk that they are right to tell. • Explain to them that concerns may have to be shared with someone who is able to act and pass on immediately to the DSO. • Make a written record of what has been disclosed at the earliest opportunity. 	<ul style="list-style-type: none"> • Speculate or make assumptions • Make negative comments about the alleged abuser. • Make promises or agree to keep secrets. • Ask the adult at risk or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation. • Do not take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.
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Responding to Concerns

It is the responsibility of the individual staff member to report any concerns to the DSO and to assist in any further action required on behalf of BACT.

If any employee, trustee or volunteer has any concerns regarding an adult at risk who they think is being abused it is important for them to act immediately. All concerns must be shared with the DSO. If the DSO is not available, either because they are on annual leave or off sick then any concerns should be discussed with the Head of Community or Burton Albion Football Club's DSO's.

The DSO or Head of Community should also ensure that the employee reporting the incident is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

Where there is evidence of immediate harm then the employee should phone 999 and report the incident to the Police.

Where there is any possibility that a criminal act may have been committed care should be taken not to take any action that may jeopardise any subsequent criminal investigation.

To make a referral about an adult at risk contact SSAP. The referral must be followed up in writing within 24 hours.

NB: if the adult at risk lives outside of Staffordshire but accesses services within Staffordshire, the referral must be made to the area in which the adult at risk resides.

The record should include:

- The date and time.
- The adult at risks name, address and date of birth.
- The nature of the allegation.

- A description of any visible injuries.
- Observations – e.g. a description of the adult at risks behaviour and physical and emotional state.
- What the adult at risk said and what was said in reply. Please record this as accurately as possible, using their choice of language.
- Any action taken because of the concerns being raised e.g. who was spoken to and resulting actions. Include names, addresses and telephone numbers.
- Sign and date what has been recorded to.
- Store the information in accordance with relevant procedures, e.g. Data Protection.
- Report to Designated Safeguarding Officer.

Actions to be taken by the DSO, Head of Community and staff are as follows:

- The procedure contained within this policy will be followed.
- Where concerns relate to an adult at risk advice must be sought from SSAP between 8:30am – 5:00pm Monday – Thursday (excluding Bank Holidays) and 8:30am – 4:30pm Fridays. To make an Adult Protection referral, advice should be sought from the Contact Centre **0345 604 2719**.
- **Outside of 8.00am and 5.30pm** any concerns relating to an adult should be directed to Staffordshire County Council's **Emergency Duty Service on 0345 604 2886**.
- Alternatively, you can contact Staffordshire Police Central Referral Unit on **101** or dial **999 in an emergency** where someone is at risk of immediate harm.

Consent

The DSO should in general discuss any concerns with the adult at risk and where possible seek their consent to making referrals to SSAP, this should only be done where such discussion and agreement-seeking will not place the adult at risk or others at increased risk of suffering significant harm.

Consent is not required for adult protection referrals; the DSO would need to inform parents / carers that you are making a referral as stated above, unless by alerting them you could be putting that adult at risk or others at risk.

Responding to Allegations Against Staff and Volunteers

It is essential that any concerns for the welfare of an adult at risk arising from abuse or harassment by a member of staff or a volunteer should be reported **IMMEDIATELY** to the DSO or in their absence to the Head of Community. Details for key safeguarding contacts are displayed earlier in this policy.

If an adult has suffered or is at risk of suffering significant harm the DSO will contact and speak to:

- **Police:** For any actions which may constitute criminal activity or where there are concerns for the immediate safety of an adult at risk or other members of the public.
- **Local Authority Social Services in the area where the abuse is alleged to have taken place:** In some cases, initial fact finding (but not full investigation) will be required in order to determine whether the alleged action or inaction of a member of staff is, or can reasonably be determined to be, an abuse of an adult who needs care and support.

Support for the Referrer

BACT will fully support and protect all staff who, in good faith (without malicious intent), make a referral about a colleague who may be abusing an adult at risk and report his or her concern about a colleague's practice.

This support may take the form of counselling through BACT's designated service, moving the person reporting the abuse / potential abuse to another workplace temporarily whilst the incident is investigated. However, all staff have a duty to safeguard and promote the welfare of adults at risk and the DSO has a duty to investigate concerns robustly. It may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

WHISTLEBLOWING

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrong doing.

Raising a concern is known as "blowing the whistle" and is a vital process for identifying risks to children's safety.

The board of Trustees' should ensure there is a current whistleblowing policy in place and that staff have received a copy and have had the opportunity to raise concerns. There is a culture evident in BACT to raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with the agreed whistleblowing procedure which is to be developed in accordance with the recommendations contained within this policy.

BACT has a Whistleblowing policy which staff can follow if there are reasons why the standard procedures for dealing with allegations make them feel particularly vulnerable, or if they consider their concerns are not being acted upon appropriately. A copy of this policy can be obtained from bact@burtonalbionct.org.

GOOD PRACTICE EXAMPLES

All staff should adhere to the following principles when working with adults at risk:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Make the experience of sporting activity fun and enjoyable, promote fairness, confront and deal with bullying appropriately.
- Treat all adults at risk equally and with respect and dignity.
- Always put the welfare of the adult at risk first.
- Maintain a safe and appropriate distance and avoid unnecessary physical contact with adults at risk.
- Where any form of manual / physical support is required it should be in clear view of the rest of the group and with the consent of the adult at risk. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the adult at risk's consent has been given.
- If groups must be supervised in changing rooms always ensure coaches etc. work in pairs.
- Written consent is required from the adult at risk or parent / carer if BACT staff are required to transport them.
- Be a good role model, this includes not smoking or drinking alcohol in the company of adults at risk.

- Always give enthusiastic and constructive feedback rather than negative criticism.
- Gain written consent from the adult at risk or parent / carer for BACT to act or to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Do not transport adults at risk in your own personal vehicle.
- Keep a written record of any injury that occurs, along with details of any treatment given.

POOR PRACTICE / UNACCEPTABLE BEHAVIOURS EXAMPLES

The following is regarded as poor practice and should be avoided by all staff:

- Unnecessarily spending excessive amounts of time alone with adults at risk away from others.
- Being alone in changing rooms, toilet facilities or showers used by adults at risk.
- Taking adults at risk alone in a car journey, however short.
- Taking adults at risk to your home where they will be alone with you.
- Allow or engage in inappropriate touching of any form.
- Allowing adults at risk to use inappropriate language unchallenged.
- Making sexually suggestive comments, even in fun.
- Reducing an adult at risk to tears as a form of control.
- Allow allegations made by an adult at risk to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the adult at risk can do for themselves.

Any employee, trustee or volunteer who becomes the subject of a police investigation in relation to physical or sexual offences against adults at risk or are charged with such a criminal offence must inform the DSO immediately. Any employee, trustee or volunteer must disclose any convictions, cautions, court orders, reprimands or warnings which may affect their suitability to work with adults at risk whether received before, or during their employment with BACT.

LINKED POLICIES

- Equality
- Complaints and Appeals
- Whistleblowing
- Safer Recruitment

POLICY REVIEW

This will be an ongoing process in preparation for the annual review (unless legislative change or learning outcomes from an incident dictates the need to review sooner). Regard will be given to implementing, communicating and monitoring the policy to ensure procedures and practices are effective, strengthened or developed and are focused on keeping adults at risk safe.

RECOMMENDATIONS FOR 2018-2019

BACT are committed to ensuring relevant policies, procedures and working practices are in place to safeguard children. The recommendations for the coming year will include:

- Develop and implement the following policies:
 - Managing Allegations Against Staff & Volunteers (including procedure).

- Trips, Tours, Tournaments including Transport.
- Social Media and Internet Safety.
- Photograph / Images.

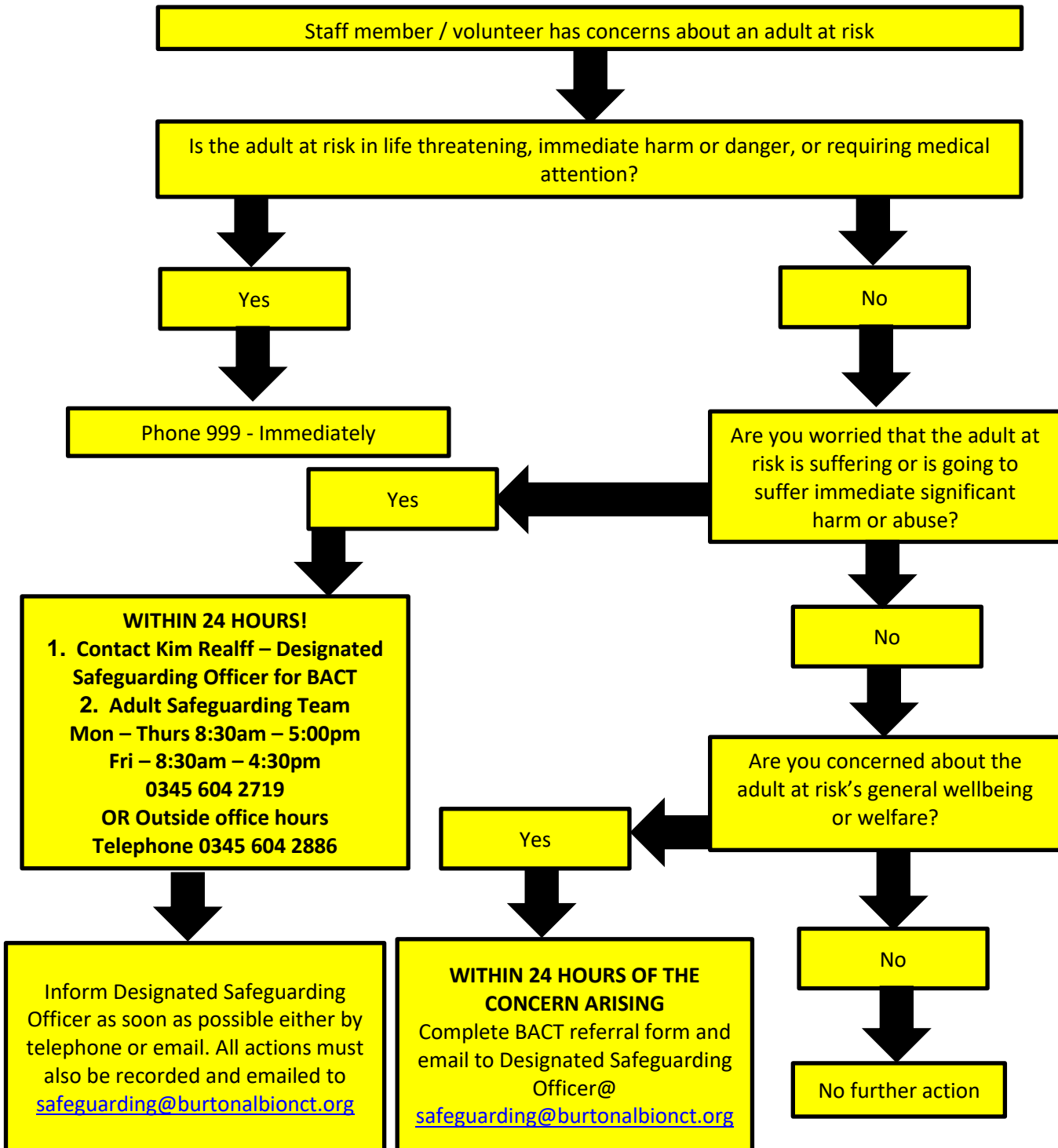
Review the following policies:

- Complaints and Appeals Policy to include procedure
- Whistleblowing Policy due for review October 2018

During the following 12 months, Adult at Risk training will be delivered to relevant staff. Staff who fail to follow this policy and procedures for safeguarding and promoting the welfare of adults at risk may be subject to disciplinary procedures.

APPENDIX A

SAFEGUARDING ADULTS AT RISK PROCEDURE



Kim Realff (Designated Safeguarding Officer) – 07739 351146. In the case of an emergency and Kim Realff is unavailable please contact Matt Hancock (Head of Community) – 07841 669182. If neither Kim Realff or Matt Hancock are available, please contact Burton Albion Football Club’s Safeguarding Officers or Senior Safeguarding Manager.



APPENDIX B



STAFF CODE OF CONDUCT

Burton Albion Community Trust staff involved in delivering activities for adults at risk have a great opportunity to be a positive role model and help build an individual's confidence.

Staff are expected to:

- Ensure the safety of all adults at risk by providing effective supervision, proper pre-planning of sessions and using safe methods.
- Consider the wellbeing and safety of participants before the development of performance.
- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Treat all adults at risk fairly and ensure they feel valued.
- Encourage all adults at risk not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability.
- Not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour.
- Appreciate the efforts of all adults at risk and not over-train them. Never exert undue influence over performers to obtain personal benefit or reward.
- Be positive, approachable and offer praise to promote the objectives of BACT.
- Not let any allegations of abuse of any kind or poor practice to go unchallenged or unrecorded. Incidents and accidents to be recorded in the line with BACT's procedures. Carers must be informed where applicable.
- Never use sanctions that humiliate or harm adults at risk.
- Report accidents or incidents of alleged abuse or poor practice to the Designated Safeguarding Lead.
- Staff trained to administer minor emergency aid must only do so in the presence of others and where required refer more serious incidents to the 999 emergency services. An incident report must be completed and submitted to BACT's Senior Administrator.
- Have access to telephone for immediate contact to emergency services if required.
- Establish and address the additional needs of disabled participants or other vulnerable groups.
- Not abuse an adult at risk either physically, emotionally or sexually.
- Not engage in a sexual relationship with an adult at risk for whom they are responsible
- Maintain confidentiality about sensitive information.
- Respect and listen to the opinions of adults at risk.
- Take time to explain any techniques to ensure they are clearly understood.
- Develop an appropriate working relationship with participants, based on mutual trust and respect.
- Be a role model, displaying consistently high standard of behaviour and appearance (disciplined / committed / smart / on time, no bad language).
- Refrain from smoking and consumption of alcohol during Trust activity sessions.
- Never condone rule violations, rough play or the use of prohibited substances.
- Not to spend excessive amounts of time alone with adults at risk unless there are exceptional circumstances. Always ensure you are visible to others.
- Never take adults at risk to their home.
- Never administer Emergency Aid involving the removing of an adult at risks clothing unless in the presence of others.
- Hold appropriate valid qualifications and insurance cover.
- Make the activity **fun**.



Staff have the right to:

- Access on-going training and information on all aspects of leading / managing activities for adults at risk, particularly on Safeguarding.
- Support in the reporting suspected abuse or poor practice.
- Access to professional support services.
- Fair and equitable treatment by BACT.
- Be protected from abuse by adults at risk, other adult members and carers.
- Not to be left vulnerable when working with adults at risk.

Any minor misdemeanors and general conduct issues will be dealt with immediately and reported verbally to the Designated Safeguarding Lead who will record any reported concerns and advise the relevant Department Manager. Serious or persistent breach of this Code must also be reported to the Designated Safeguarding Lead who will liaise with the relevant Department Manager. If disciplinary action is taken it could lead to dismissal from BACT.

Dismissals can be appealed by the member of staff with the final decision taken by the Head of Community or Board of Trustees.

Emergency Action and First Aid

All staff should be prepared with an action plan in the event of an emergency and be aware of BACT’s First Aid Procedures.

This will include:
<ul style="list-style-type: none"> • Access to First Aid equipment • Telephone contact to carers • Telephone contact to the Emergency Services

Signature of staff member:	
Print name of staff member:	
Date:	
Signature of line manager:	
Date:	





APPENDIX C



IMAGE CONSENT FORM

Burton Albion Community Trust produce a range of print materials and online information, which can include photographic images (moving and still) of subjects, and can use case studies which can include these images and full name, to enhance and illustrate its media applications.

The below consent form covers any use of photographic images by BACT. BACT will only use the full name of an adult at risk to accompany an image if BACT has received a completed consent form.

We will only use images of adults at risk that are appropriate to the subject(s) they illustrate to reduce the risk of such images being misused.

Images maybe used in conjunction with other images to form a compilation image.

The above is to be read in conjunction with the Use of Photography & Film Images section of BACT's Safeguarding Adults at Risk Policy.

I give permission for Burton Albion Community Trust to take photographs and / or videos.

I grant full rights to use the images resulting from the photography / video filming, and any reproductions or adaptations of the images for reporting, publicity or other purposes to help achieve BACT's aims. This might include (but is not limited to), the right to use them in their printed and online publicity, social media and press releases.

I also give permission to be interviewed by Burton Albion Community Trust and for them to use my words

I understand that Burton Albion Community Trust will do all in its power to ensure any images or video taken will be kept safe and secure and used only for the explained Trust publicity which may include use on the official website. However, I also accept that they cannot unequivocally be responsible for the image or video created. I have been made aware of BACT's commitment to the safeguarding of adults at risk and have been offered the opportunity to discuss this further with the Designated Safeguarding Officer if I wish.

I confirm that I am not subject to legal proceedings.

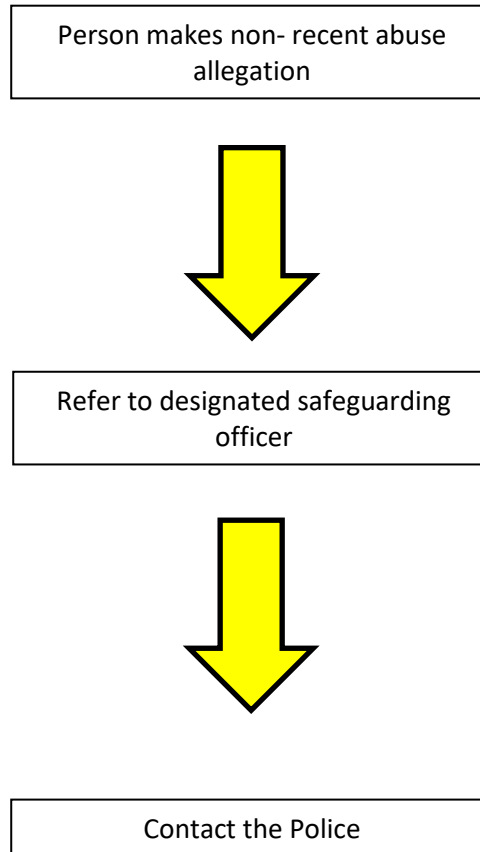
Name	
Date of Birth	
Signed	
Name of Carer (where applicable)	
Carers contact number	
Signed (carer)	
Date	



APPENDIX D



NON RECENT ABUSE PROCEDURE



**** If a person does decide to report, they will be supported by BACT throughout the process ****



APPENDIX E



SAFEGUARDING REFERRAL FORM

STRICTLY PRIVATE AND CONFIDENTIAL SAFEGUARDING ADULTS AT RISK REPORT CONCERNS / DISCLOSURE FORM

This form should be completed to record your concern or a disclosure and then shared with the Designated Safeguard Officer – safeguarding@burtonalbionct.org **within 48 hours for non-urgent concerns and 24 hours if a disclosure / allegation is made or there is a risk of harm self-harm or self-harm occurs.**

Please mark the email 'strictly private and confidential' in the subject heading. If handwriting this report, put in a sealed envelope and mark for the attention of Kim Realff (or in Kim's absence, Matt Hancock), 'strictly private and confidential'. This information may be shared with SSAP.

PERSON MAKING THE REPORT

Name	
Job title	
Department	
Contact number	
E-mail address	
Date & time concern was identified	

ABOUT THE ADULT AT RISK

Name of the adult that you have concerns about	
Address of adult that you have concerns about	
Date of birth of adult	
Nationality	

Is the person at risk aware of this report being submitted? Yes No

Has the person consented to the report? Yes No

Is there any reason to question the person's mental capacity to consent to the report? Yes No

Is there any reason to question the person's mental capacity regarding the allegation? Yes No

Does the person require support with communication? Yes No

INFORMATION ABOUT THE ALLEGED ABUSER

Name	
Address	
Postcode	
Contact number	
Organisation (if appropriate)	
Role within organisation (if appropriate)	
Relationship to person being referred	

Is the alleged abuser the main carer? Yes No

Is the alleged abuser also a vulnerable adult? Yes No

Does the alleged abuser have capacity to understand
Implications of their actions? Yes No

NATURE OF YOUR CONCERN

- (Please give as much information as possible, ie when where, who was there, who was involved, full names)
Please see notes on the last page which you may find useful when completing this section

--

ACTION YOU HAVE TAKEN

<p>What have you done about the concern? ie reported to Designated Safeguarding Officer, Police, Adult Protection Team</p> <p><i>*Please provide as much details as possible with regards to any conversations had, ie if the referral was accepted, advice given etc</i></p>	
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Signature	
Date action taken	

TO BE COMPLETED BY THE DESIGNATED SAFEGUARDING OFFICER

Name of Designated Safeguarding Officer	Kim Realff
Date and time concern received	
Actions taken	





KEY LEGISLATION, RULES, REGULATIONS AND GUIDANCE

**Please note this is not an exhaustive list*

Disclosure & Barring Service (2013)
The Care Act (2014)
Safeguarding Vulnerable Groups Act (2006)
Sexual Offences Act (2003)
The Equality Act (2010)
Data Protection Act (1998)
The Mental Capacity Act (2005) (over 16's)
Digital Economy Act 2017
Borders, Citizenship & Immigration Act 2009
Protection of Freedoms Act (2012)
Female Genital Mutilation Act (2013)

FURTHER CONTACTS

EFL Trust DSO	Clare Taylor EFL Trust Safeguarding Officer ctaylor@eflTrust.com 01772 325800
EFL Child Protection Advisor	Alexandra Richards Safeguarding Manager EFL arichards@efl.com T: 01772 325940 M: 07792284740
The Football Association	www.thefa.com/football-rules-governance/safeguarding
FA Safeguarding Team	0800 169 1863 or via Safeguarding@TheFA.com
The FA CRC	FAChecks@TheFA.com GB Group (formerly TMG CRB 2015) are the registered body administering the CRC process on behalf of The FA
LFE	League Football Education www.lfe.org.uk Tel: 01772 326 870
Charity Commission	www.charity-commission.gov.uk Tel: 0845 3000 218
DBS	The Disclosure & Barring Service (helps employers make safer recruitment decisions) www.gov.uk/government/organisations/disclosure-and-barring-service
DBS Referral Guidance	Factsheet: when to make a referral to the (DBS) https://www.gov.uk/government/collections/dbsreferrals-guidance--2#barring-and-referral-guidance
DBS Frequently Asked Questions	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143692/dbs-referral-faq.pdf
DBS and 'Regulated Activity'	www.gov.uk/government/organisations/disclosure-and-barring-service