





# Plymouth Argyle Football Club

## Safeguarding Adults at Risk Policy

### 1 Introduction

1.1 Plymouth Argyle Football Club (PAFC) acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all adults at risk who are under PAFC's care or who are utilising PAFC facilities. Everyone working at PAFC has a duty of care to safeguard the welfare of adults at risk by creating an environment that protects them from any harm.

1.2 The wellbeing of all adults at risk is paramount and always the first consideration, and all staff must make themselves aware of the PAFC Safeguarding Adults at Risk Policy. The following guidelines will be supplemented by in-service training and additional guidance accordingly.

### Definitions

1.3 The Care Act 2014 states that safeguarding adult's procedures apply to anyone aged 18 or over, who is in need of support and care and may be at risk of abuse or neglect, and who is unable to keep themselves safe from significant harm or being exploited due to their support and care needs.

1.4 Abuse - This is defined as the harming of another person; this could be by a person who is in a position of power. This harm could physical, psychological or emotional, or it could be by exploiting the individual in more subtle ways. Threats or the use of punishment are also forms of abuse.

1.5 Capacity - being able to make a decision at any given time, especially in stressful situations is known as capacity. In the first instance, it must always be assumed that a person has capacity to make a decision, unless it can be established that they lack capacity as defined in the Mental Capacity Act 2005.

1.6 Consent - Adults at risk should always be provided with support and information to ensure they feel empowered to make their own rational decisions. PAFC recognise the importance of adults at risk having a right to independence and knowing information about themselves. Whilst staff are expected to empower individuals and provide them with the tools to make an informed decision, staff are not expected to make decisions on their behalf.



Where unsure, the Designated Safeguarding Officer should be called. The Designated Safeguarding Officer may decide that consent is not needed in circumstances such as, if others are at risk, if the person exposed to life threatening risk is unreasonably withholding their consent, amongst others.

### Rules and Regulations

- 1.7 In the management of PAFC programmes, the implementation of this policy and the usage of its functions, PAFC will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.
- 1.8 In the case of adults at risk, PAFC is also mindful of its responsibilities under the following legislation and guidance;
- The Care Act 2014,
  - Sexual Offences Act 2003,
  - Care and Support Statutory Guidance 2018,
  - Safeguarding Vulnerable Groups 2006,
  - Serious Crime Act 2015,
  - Mental Capacity Act 2005,
  - Prevent Strategy,
  - Human Rights Act 1998,
  - Domestic Violence, Crime and Victims Act 2004
- 1.9 PAFC also recognises its responsibility to work with multi agencies to protect vulnerable adults at risk from harm and to respond quickly to safeguarding concerns.

### Document Review

- 1.10 In line with all other PAFC policies, this policy will be reviewed annually, or if there are any organisational or legislative changes that require it sooner. The policy may also be reviewed or amended after a concern, incident, or allegation whereby the key aims and principles need revision to ensure they are met. All amendments are submitted to the Chief Executive Officer/Senior Safeguarding Officer for approval.

### Aims and Key Principles

- 1.11 The aims of this policy are:
- To safeguard all adults at risk who interact with PAFC whilst demonstrating best practice in this area,
  - To positively expose and uphold PAFC values regarding safeguarding adults at risk,



- To evolve a pro-active welfare programme to enable all adults at risk to participate in a fun and safe environment where they are free from the fear of abuse,
- To encourage all adults to provide good role models of behaviour,
- To uphold a clear system of support, prevention, and early intervention in safeguarding matters and where necessary, prompt a response of necessary actions to safeguard adults at risk.

1.12 **Key Principles of this policy are (as defined in the Care Act 2004):**

- Empowerment - being supported and encouraged to make independent decisions,
- Prevention - better to take action before harm occurs,
- Proportionality - least intrusive response appropriate,
- Protection - support those in greatest need,
- Partnership - working with services in the local community,
- Accountability - being culpable and transparent.

1.13 **Senior Safeguarding Manager**

The Senior Safeguarding Manager (SSM) has overall responsibility for the safeguarding of adults at risk at PAFC. The SSM will:

- Meet monthly with the DSO to review concerns on the case management system and to review activity within PAFC that involves adults at risk to ensure all policies and procedures are in line with club values.
- Undertake regular monitoring and risk assessments of activities involving adults at risk (or delegate this task to the Head of Health and Safety, or Designated Safeguarding Officer).

1.14 **Designated Safeguarding Officer**

PAFC has a Designated Safeguarding Officer (DSO) who has responsibility for the safeguarding for adults at risk and PAFC, including the academy.

The DSO will:

- Investigate and gather information on any allegations or concerns of abuse,
- Make the decision to refer to an appropriate statutory agency (Police, MASH),
- Liaise with the local Safeguarding Adult's Board,
- Ensure all staff (including volunteers) are trained on PAFC specific safeguarding procedures,
- Undertake regular training for the role,
- Regular monitoring of activities involving adults at risk and liaise with staff members to ensure best practice in every department.

Anybody with a concern about a child or young person should contact the SSM or DSO direct, or if the child is at immediate risk call 999.



1.15 All staff (including contractors and volunteers) are expected to:

- Be vigilant to the signs of abuse and take responsibility in reporting concerns to the Designated Safeguarding Officer,
- Listen and take all concerns seriously,
- Maintain records accurately,
- Always abide by the club values,
- Always positively promote the health and wellbeing of children

## 2 Safer Recruitment and Human Resources

### 2.1 Recruitment

2.2 PAFC follows Safer Recruitment guidelines, these are detailed in our Safer Recruitment Policy and Safeguarding Children and Young People Policy and should also be applied to Adults at Risk.

### 2.3 Training

2.4 All employees are issued this policy upon commencement of employment. This policy is also available to staff on SharePoint. All staff undertake safeguarding training and receive internal training via the Designated Safeguarding Officer.

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

2.6 PAFC undertake DBS checks which include criminal checks on individuals who work for the club. Enhanced DBS checks, including barred list checks allow PAFC to ensure a thorough recruitment process for those working in positions that involve adults at risk.

2.7 New Appointments into the club which involves working with Adults at Risk will be required to undertake an Enhanced DBS check and complete a self-declaration every 12 months. All offers of work are subject to these checks. Until such time as a satisfactory DBS has been received, the member of staff will not be permitted to work with Adults at Risk.

2.8 Upon receipt of a positive DBS check, a risk assessment will be out by the Senior Safeguarding Manager and the Designated Safeguarding Officer, along with any other relevant Heads of Department, to assess the information enclosed. The Rehabilitation of Offenders Act and Protection of Freedoms Act should be considered in all final decisions.



2.9 **Aims and Objectives:**

- To select and retain the best candidate for the given vacancy and the basis of abilities and suitability for the role,
- Ensure that all candidates are considered equally, consistently and fairly for the role,
- To ensure that no candidate is discriminated against on the basis of protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, married/civil partnership, pregnancy and maternity, race, religion or beliefs, sex or sexual orientation).
- To always ensure compliance with relevant legislation and guidance that is in place at that time, this includes statutory guidance from the Department of Education, Keeping Children Safe in Education (2023),
- Ensuring that PAFC meets its commitment to safeguarding and the promotion of welfare by carrying out all pre-employment checks.

2.10 **Roles and Responsibilities**

2.11 It is the responsibility of the HR department to ensure that PAFC has effective recruitment policies in place.

2.12 It is the responsibility of the HR department, Senior Safeguarding Manager, Designated Safeguarding Officer and recruiting managers to:

- Ensure the safer recruitment procedures are adhered to,
- Ensure that all necessary checks are carried out on successful candidates (this may include social media checks and successful candidates will be made aware of when these checks will be conducted)
- Monitor the compliance of contractors and agencies in line with this policy,
- Promote the welfare of children at every stage of the recruitment process.

2.13 All staff members involved in the recruitment process of staff are responsible for complying with the provisions set out in this policy.

2.14 **Disclosure and Barring Service Criminal Record checks (DBS)**

2.15 DBS checks will be carried out for all relevant postholders. New starters are strictly not permitted unsupervised access to children and young people until a satisfactory DBS check has been received by the Designated Safeguarding Officer, who's responsibility it is to ensure these checks are conducted in a timely manner. PAFC processed DBS checks via First Advantage, Know Your People.



### Process for Disclosure and Barring Service Checks (DBS)

#### 2.16 **New starters**

2.17 All staff members who are offered a position that involves them working with adults at risk, will be required to undertake an Enhanced DBS check with Barred List checks where appropriate. All offers of work are subject to the outcome of this check. Where possible, this is set out in the initial job application and within the applicants offer of employment. The staff member will not be permitted to work with adults at risk until this check has been received and reviewed where necessary.

2.18 Should a DBS check be received that requires reviewing, a risk assessment will be carried out by the Senior Safeguarding Manager, HR department and Designated Safeguarding Officer. The Rehabilitation of Offenders Act and Protection of Freedoms Act should always be considered before a final decision is made.

#### 2.19 **New starters who already has an FA DBS check or non-FA DBS check**

2.20 Where an FA DBS check is held by the applicant from a previous employer, PAFC will still require a further check if the date of the check is more than one month old. This applies to new starters with a non-FA DBS check by a previous employer.

### 3 **Recognising Signs of Abuse**

3.1 The following lists of signs of abuse are not exhaustive and should not be used solely. Individuals may experience multiple signs at any given time and thus be at risk of multiple forms of abuse. You should inform the Designated Safeguarding Officer immediately upon any concerns

3.2 Physical abuse - a deliberate act of causing injury or trauma to another person. For example, pushing, slapping, hitting, kicking, burning, giving unneeded medicine.

3.3 Emotional abuse - Any act or other treatment that may cause emotional damage and undermines their sense of wellbeing, this includes persistent criticism, unrealistic expectations, verbal assault, humiliation, blaming, controlling, intimidation and use of threats.

3.4 Sexual abuse - An act which results in the exploitation of a child, young person or Adult at Risk, whether they consent or not, for the purpose of sexual or erotic gratification. This includes non contact activities, such as indecent exposure, exposing to witnessing sexual acts, grooming them in preparation of abuse (including online). The age of consent (the age in which a person is considered legally competent to consent to sexual acts) is sixteen, but it is unacceptable for any member of staff to abuse their position of trust for sexual gratification.



- 3.5 Neglect - This is the ongoing failure to meet the basic needs of a child, young person or Adult at Risk. Examples are not providing adequate food or shelter, failing to protect them from physical or emotional harm and failure to ensure access to necessary medical care and treatment. In an activity setting this could look like failure to provide adequate supervision or exposing them to unnecessary risks.
- 3.6 Grooming - This is the development of a relationship and trust from the child, young person or Adult at Risk to exploit, abuse or traffic them. Grooming can happen in person and online.
- 3.7 County Lines - Organised criminal distribution of drugs from big cities into smaller towns and rural areas using children, young people and Adults and Risk to carry them. These vulnerable groups are recruited by gangs via deception, intimidation, violence and/or grooming. Gangs can also take over the house of an Adult at Risk as a base.
- 3.8 Cuckooing - This term is often linked to county lines. This is when the gang uses a vulnerable individual's home in the target location. People exploited in this way are often subject to further abuse including physical, sexual and emotional. Victims of Cuckooing are often drug users but can include the elderly, female sex workers, single mums and those living in poverty. These victims can often suffer with additional forms of addiction such as alcoholism.
- 3.9 Radicalisation - When a person comes to support terrorism or forms of extremism, leading to terrorism. Any person, from any background, can be radicalised.
- 3.10 Female Genital Mutilation (FGM) - Procedures that intentionally alter or injure female genital organs for non-medical reasons. This procedure has no health benefits for girls or women. The Female Genital Mutilation Act makes it illegal to practice FGM in the UK or to take females who are British nationals/permanent residents of the UK abroad for FGM, whether or not it is lawful in another country.
- 3.11 Forced Marriage - Where one, or both parties do not (or cannot) consent to the marriage. In the UK this is recognised as a form of domestic and/or sexual violence against men and women. When this affects children, it is child abuse. Violence does not have to be used to make this illegal.
- 3.12 Honour based Abuse/Violence - Honour Based Abuse (HBA) or Honour Based Violence (HBV) are a collective of practices which are used to control behaviour within social groups or families to protect perceived cultural and religious beliefs. This can occur when the perpetrator perceives that a relative has shamed the family or community.





Victims are more likely to be abused multiple times by multiple perpetrators. In relation to children, it can be deeply embedded coercive control with expectation of behaviours being made clear from a young age. Honour based abuse can include forced marriage, domestic and sexual abuse, rape, physical assault, kidnap, threats of violence, violence directed towards someone else (such a sibling) and FGM.

The 'One Chance Rule' - There may only be one opportunity to speak to a victim or potential victim and may have only one chance to save a life. If the victim is allowed to leave without appropriate support, that one chance might be wasted.

- 3.13 Bullying - Repeat behaviour of intended intimidation or to upset someone and make them feel uncomfortable or unsafe. This can include name calling, isolation, spreading rumours, embarrassing someone in front of others, threatening or causing harm, damaging someone's possessions.
- 3.14 Cyberbullying - Use of technology to harass, threaten, embarrass, humiliate, or target a person. By the definition, it occurs to children and young people. When this occurs to adults, it is cyber harassment or cyberstalking.
- 3.15 Discriminatory abuse - This is where abusive or bullying behaviours are motivated by prejudice against certain people or groups of people. This could be because of age, gender, race, nationality, religion, sexual orientation and other reasons. Actions could include unfair or less favourable treatment, insults including racial slanders. This sort of behaviour will not be tolerated under any circumstances and will be reported to the FA; this also includes off pitch behaviours on social media.
- 3.16 Poor Practice - This is where behaviour falls short of abuse but is unacceptable. Poor practice must always be challenged and reported. Failure to report such behaviour could result in an environment where abuse is more likely to go unnoticed. Example of poor practice are ignoring health and safety guidelines, giving continued preferential treatment to individuals, compromising welfare, allowing concerning practice to go unreported.
- 3.17 Hazing - Initiation activities, rituals, actions/situations, with or without consent, that recklessly, intentionally or unintentionally, endanger the physical or emotional wellbeing of a child, young person or Adult at Risk.
- 3.18 Infatuations - Children, young people and Adults at Risk can develop infatuations with members of staff who work with them. These situations are sensitive and so should be handled in a way that maintains the dignity and safety of all involved. In these situations, words or actions may be misinterpreted and so staff should be hypervigilant. Should a member of staff become aware of an infatuation involving themselves or someone else, this should be reported to the Designated Safeguarding Officer as soon as possible.



3.19 Financial Abuse - this includes theft, fraud, exploitation, scamming online, coercion into adult financial affairs including pensions, wills and property.

3.20 Modern Slavery - includes human trafficking, forced labour. Coercion is the main way a perpetrator will deceive an adult at risk.

#### 4 Reporting

4.1 The Designated Safeguarding Officer should be contacted as early as possible to negate any lost time for action to be taken. It is recognised that some situations may require an immediate response and so the reporting may be delayed.

4.2 The following guidance is in place to help support a person in reporting abuse or suspected abuse and poor practice:

DO:

- Always ensure the safety of the adult at risk,
- Treat all allegations as serious,
- Give reassurance that the adult at risk is not to blame,
- Praise them for doing the right thing in speaking to you,
- Be honest about who you will have to tell and why,
- The adult at risk should understand what you will do and when,
- Take action as soon as possible,
- Write everything down that has been said, sign and date also,
- Consider seeking medical advice if necessary.

DO NOT:

- Promise anything, such as keeping secrets,
- Interrogate - this is for the Police and/or Adult Services,
- Change what they are saying to you,
- Make them feel like they are to blame,
- Inform any parents/carers - this is for the Designated Safeguarding Officer.

4.3 Doing nothing is **NOT** an option. Safeguarding is **EVERYONE'S** responsibility.



## 5 Recording and Investigation

- 5.1 If it has not already been reported via My Concern, the Designated Safeguarding Officer will create a report via My Concern. This will immediately inform the Senior Safeguarding Manager.
- 5.2 Any statements, including those of the adult at risk, should be written in their own words. These reports should be confined to facts only. Opinions or judgements should be clearly stated. One question should be used, in the format of TED (Tell me, Explain, Describe). There should not be any suggestions made about who the perpetrator may be.
- 5.3 All matters are confidential on a need-to-know basis and there should never be any reservations about referring a concern to the Designated Safeguarding Officer. PAFC cannot always guarantee confidentiality given to the adult at risk.
- 5.4 PAFC will always ensure that any person is removed from any possible risks of harm.
- 5.5 Investigations into such possible abuse must be managed carefully and sensitively. In the first instance, the Designated Safeguarding Officer and Senior Safeguarding Manager will work closely with Adult Services, the Local Authority Designated Officer (LADO), the Police, the FA safeguarding team, before conducting an internal inquiry and take advice on informing parents.
- 5.6 Any investigation PAFC undertake will follow the key principles as follows:
- Integrity - PAFC will always be honest with all parties involved regarding the process, what we can, and can't do,
  - Fairness and impartiality - Complainants and witnesses will be spoken to, as well as the individual in which the concern relates to. This will allow for a balanced and unbiased account of events,
  - Confidentiality - PAFC will only share information with parties necessary for safeguarding reasons (Police, Local Authority, children's services etc).
  - Proportionality - decisions are made on a case-by-case basis,
  - Timeliness - the process will never be rushed by PAFC recognise the disruption inquiries can cause.



5.7 **Allegations against members of staff**

5.8 This will include full-time, part-time, unpaid, contracted, voluntary.

5.9 If the report involves a member of staff and the club believes that the staff member has either behaved in a way that has harmed, or may have harmed an adult at risk, possibly committed a criminal offence against or related to the adult at risk, or behaved towards an adult at risk in a way that indicates being unsuitable to work with adults at risk, then the Designated Safeguarding Officer shall inform the Local Authority Designated Officer (LADO) so that they can contact the police and adults board as appropriate. Where the Designated Safeguarding Office may be unsure whether the criteria has been met, the advice of the LADO will be sought.

5.10 The staff member in question will be asked to write a statement, as will any other persons deemed to have an involvement. The staff member will be asked to stay away from all activities involving the other party whilst the investigation is ongoing. Providing it does not contradict the advice of the LADO, an internal investigation will be carried out in line with HR policies and any grievance procedures.

6 **Whistleblowing**

6.1 Whistleblowing within safeguarding means the revealing and raising of concerns over misconduct or malpractice with the organisation, or independent structure within it.

6.2 Any person with concerns about a colleagues conduct towards an adult at risk can also use the whistleblowing policy by contacting the FA safeguarding team.



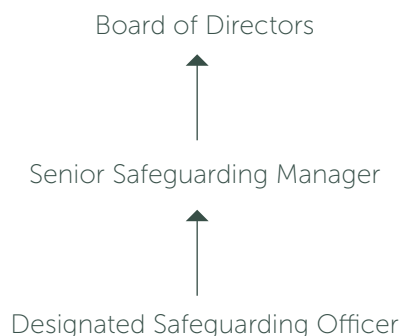
## 7 Organisational Safeguarding Flowchart

7.1 Safeguarding across PAFC is given the highest priority. PAFC have a full time Designated Safeguarding Officer to promote best practice and create a safer culture across all aspects of the club.

At PAFC operational board level, the Senior Safeguarding Manager endorses all safeguarding policies on behalf of the board. Safeguarding is a standing agenda item at board meetings and the Designated Safeguarding Officer reports regularly.

PAFC have safeguarding representatives across all aspects of the business to ensure the highest standards are maintained.

There are additional safeguarding policies and procedures, which give greater detail and support this central document.



7.2 The Argyle Community Trust have their own Designated Safeguarding Officer and safeguarding management structure. The DSO's meet monthly in order to share information and promote best practice.

7.3 PAFC have a dedicated Disability Liaison Officer (DLO) who is the first point of contact for those with additional considerations when attending matchdays or other PAFC events. It is recognised that the safeguarding team have support within their role, and so the Designated Safeguarding Officer has supervision by the way of regular meetings with the Senior Safeguarding Manager.



## 8 Useful Contacts

8.1 If a child, young person or adult at risk is at immediate risk of harm, call **999**.

Name	Email	Phone
Rhiannon Foote - DSO	safeguarding@pafc.co.uk	07933 751103
Andrew Parkinson - SSM	andrew.parkinson@pafc.co.uk	01752 562561
Mackenzie Brown - Academy Head of Player Care	mackenzie.brown@pafc.co.uk	01752 562561
Zac Newton - HR	zac.newton@pafc.co.uk	01752 562561
Emily Rowland - DLO	emily.rowland@pafc.co.uk	01752 562561
Alison Lowman - ACT DSO	alison@argylecommunitytrust.co.uk	01752 562561
EFL	safeguarding@efl.com	
The FA	safeguarding@thefa.com	
Police	101@devonandcornwall.pnn.police.uk	999 / 101
Prevent	prevent@devonandcornwall.pnn.police.uk	01392 225130
Police Anti-Terrorist Hot Line		0800 789 321
PSCP (Out of hours)	gateway@plymouth.gov.uk	01752 668000 01752 346984
LADO	lado@plymouth.gov.uk	01752 668000
Childline	Via 'locker' on www.childline.org.uk	0800 1111
NSPCC	help@nspcc.org.uk	0808 800 5000

## 9 Useful external links and contacts

- 9.1 Plymouth Safeguarding Adult's Board:  
<https://www.plymouth.gov.uk/adult-safeguarding-guidance>
- 9.2 FA Safeguarding Guidelines:  
<https://www.thefa.com/football-rules-governance/safeguarding>
- 9.3 EFL Safeguarding policies:  
<https://www.efl.com/governance/safeguarding/>
- 9.4 Prevent  
<https://www.gov.uk/government/publications/prevent-duty-guidance#%3A~%3Atext%3DThe%20aim%20of%20Prevent%20is%2Cthe%20ideological%20causes%20of%20terrorism>



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