

Safeguarding Adults

Policy and procedures



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Safeguarding Adults Policy

Date of Policy: January 2020 reviewed January 2021 reviewed January 2022 reviewed January 23 January 2024 March 2024 August 2025 February 2026

This policy super cedes any other adult safeguarding policy.

Safeguarding Policy Statement

Bristol City Women's Football Club, Bristol City Women's Professional Game Academy (PGA) and Bristol City Women's Emerging Talent Centre (ETC) are collectively referred to as "the Company".

"The Company" has both a moral and legal obligation to ensure a duty of care for adults across its services. We are committed to ensuring that all adults are protected and kept safe from harm whilst engaged in any services organised and provided by "the Company". "The Company" is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and local authority requirements.

The policy recognises that the welfare and interests of adults are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender, race, religion or beliefs, ethnicity, sexual orientation, marital or gender status or socio-economic background, all adults have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment. We will seek to ensure that our sports are inclusive and will make reasonable adjustments for any ability, disability, or impairment. We commit to continuous development, monitoring, and review.

The rights, dignity and worth of all adults will always be respected.

"The Company" recognises that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, in particular those adults with care and support needs. A disability or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare in accordance with the Care Act 2014.

As part of our safeguarding policy "the Company" will:

- Promote the safety and wellbeing of adults.
- Ensure staff, volunteers and trustees understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to adults.

- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern in line with “the Company’s” Adults Policy and Procedures.
- Ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored and retained in accordance with Data Protection Act legislation.
- Ensure that “the Company” have Safer recruitment procedures to secure the employment/deployment of suitable individuals.
- Ensure robust safeguarding arrangements and procedures are in operation.
- Recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Board.

This policy and the procedures will be widely promoted amongst staff and are mandatory for all in “the Company”. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from “the Company”.

Principles

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

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Monitoring

The policy will be reviewed a year after development and then every year after, or in the following circumstances:

- Changes in legislation and/or government guidance
- As required by the Local Safeguarding Adults Boards
- As a result of any other significant change or event.

Recruitment, Induction, training, and qualifications

All staff recruitment is conducted in an open and transparent manner to ensure that “the Company” has the best staff. Reference should be made to “the Club’s” Safer Recruitment policy.

Successful candidates are also subject to reference checks, which ask previous employers for their opinion as to whether the candidate is suitable to work with adults at risk or adults in need of care or support if the role requires it.

The employment of all “Club” staff, (where the role requires it) is subject to individuals having a relevant and up to date safeguarding qualification and enhanced DBS check. The standard recognised welfare qualification for “the Company” is the FA Safeguarding Children Certificate.

The qualification is valid for a period of two years from the date it is attained, and all staff are required to maintain their safeguarding qualification throughout their employment to ensure that it remains up to date and valid.

As part of the induction process for every member of staff (and volunteers), a copy of this Safeguarding Adults Policy is provided and discussed. This allows all staff and volunteers to understand their, and “the Club’s” responsibilities in running our activities in a controlled and safe environment for all participants. The induction process also covers the procedures for making disclosures or referrals, should the need arise.

“The Company” will also undertake mandatory in-house training and development on safeguarding and welfare, to ensure that it remains continuously at the top of the agenda for all staff.

Disclosure and Barring Service Checks

All staff and volunteers who are working with young people and/or adults at risk or adults in need of care and support are subject to an enhanced DBS check, which will be undertaken through the DBS, with the process further outlined in “the Club’s” Self-declaration form and Criminal Records Policy. These checks will be led by the Senior Safeguarding Manager (SSM) with the support of the Safeguarding administrator.

The Club undertakes not to discriminate unfairly against any person subject to a Criminal Records Check or self- disclosure based on a conviction or other information revealed.

Having a criminal record will not necessarily bar individuals from working or volunteering with “the Company” and any record will be considered as part of a risk assessment process, as outlined in the Safer Recruitment policy and Volunteering policy, that ensures suitability for the post in question.

The decision on suitability will depend on the nature of the position and the circumstances and background of the offences, cautions and other criminal intelligence.

The DBS confirms that all DBS and criminal record data will be processed on behalf of “the Company” in accordance with the provisions of the Data Protection Act 2018 and the DBS Code of Practice.

BCWFC Board Members

Ultimately, responsibilities for safeguarding and welfare within “the Company”, lies with the BCWFC Board Members. The role of the BCWFC Board in “the Company” is not to oversee the day-to-day management of safeguarding and welfare controls, but to take leadership responsibility for “the Company’s” safeguarding arrangements. The day-to-day management for safeguarding controls is delegated to the Senior Safeguarding Manager (SSM) of “the company”.

The subject of safeguarding and welfare is continuously managed and monitored by Board Members at quarterly meetings through a standard agenda item. Safeguarding and welfare is promoted by the Board Safeguarding Champion.

Senior Safeguarding Manager (SSM)

“The Company” has a Senior Safeguarding Manager (SSM) who is supported by a Designated Safeguarding Officer (DSO) in all areas of the “Club”. The officers of the “Club” will have undergone the relevant and necessary training.

The role of Senior Safeguarding Manager is:

- To be clear about the Clubs responsibilities when running activities for children, young people and adults at risk or adults in need of care and support.
- To help the Club staff and volunteers understand what their duty of care towards children, young people and adults at risk or adults in need of care and support means and entails on a day-to-day basis.
- Ensure that proper procedures and policies are in place and are followed with regard to adult safeguarding and protection issues.
- Ensure all staff and volunteers receive appropriate training.

The Senior Safeguarding Manager will lead “the Company” on safeguarding and the welfare of adults on a day-to-day basis, supported by an informed and trained workforce. This ensures that risks are managed as effectively as possible and all staff, players and volunteers, project participants and parents are aware of the processes and procedures for reporting concerns should the need arise.

Designated Safeguarding Officer (DSO)

Each area of “the Company” has a Designated Safeguarding Officer who will have undergone relevant training and DBS checks. As part of their role, they will have access to continual professional development and form part of a Safeguarding forum. (Appendix 4)

The role of the DSO is:

- To be the first port of call for safeguarding issues within their area of “the Company”.
- To report directly to Senior Safeguarding Officer any serious safeguarding concerns.
- Ensure that all concerns are reported and recorded appropriately.
- Liaise with and support SSO.

**Should a member of staff have a concern related to SSO or the Board Safeguarding Champion, they should report this directly to LADO - LADO@bristol.gov.uk.
Telephone: 0117 903 7795**

Definitions

Adult

For the purpose of this policy an adult is defined as anyone over the age of 18.

Adult at risk

Is a person aged 18yrs or over who:

- Has need for care and support (regardless of whether the local authority is meeting any of these needs).
- Is experiencing or is at risk of abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Adults in need of care or support

This is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors. A person's disability or frailty does not automatically mean that they are experiencing harm or abuse. When considering safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors and not because they may be defined by one or more of the above.

Abuse

Is a violation of an individual's human and civil rights by another person or persons.

Capacity

Refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005) - see Appendix 2.

Safeguarding

Safeguarding is the action that is taken to promote the welfare and human rights of individuals especially children, young people and adults at risk or adults in need of care and support to live free from abuse, harm, and neglect. Safeguarding is everyone's responsibility. Adult safeguarding should be person led, and outcome focused (further details Appendix 2).

Position of Trust

A relationship of trust can be described as one in which one party has power and influence over another by virtue of their work or nature of the activity.

All the policies and procedures in this document refer to adults, adults at risk or adults in need of care and support.

Types of Abuse

Abuse can happen on any occasion or in any place where adults at risk and adults in need of care are present. Abuse is any form of physical, emotional, or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to an individual regardless of their age, gender, race, or ability.

Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger. People can be abused by adults either male or female, or children.

Any allegations or suspicions of abuse, poor practice or bullying need to be responded to and reported in line with "the Company's" reporting procedures (Appendix 5 and 6).

There are different types and patterns of abuse and neglect and different circumstances in which they take place. We look in detail at the types of abuse (The Care Act 2014) in Appendix 1 and some signs to look out for if staff are concerned about abuse.

Code of conduct for staff and volunteers

“The Company” staff and volunteers involved have a great opportunity to be positive role models and help build an individual’s confidence. The concept of wellbeing is threaded throughout the Care Act and is very relevant to adult safeguarding in sport. For full details see Appendix 2.

With this in mind it is important that staff working with adults at risk and adults in need of care follow the guidelines below.

Staff and volunteers are expected to:

- Ensure the safety of all adults at risk and adults in need of care by providing effective supervision, proper pre-planning of sessions, using safe methods at all times.
- Consider the wellbeing and safety of participants before the development of their performance skills.
- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Treat all people fairly and ensure they feel valued. Have no favourites.
- Encourage all adults 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
- Be positive, approachable and offer praise to always promote the objectives of “the Company”.
- Not let any allegations of abuse of any kind or poor practice go unchallenged or unrecorded.
- Incidents and accidents to be recorded in the line with “the Club’s” procedures.
- Never use sanctions that humiliate or harm participants.
- Report accidents or incidents of alleged abuse or poor practice to the designated person
- Administer minor first aid in the presence of others and where required.
- Have access to telephone for immediate contact to emergency services if required.
- Foster team work to ensure the safety of adults at risk and adults in need of care within the group.
- Ensure the rights and responsibilities of adults at risk and adults in need of care are enforced.
- Establish and address the additional needs of disabled participants or other adults at risk and adults in need of care.
- Not abuse members physically, emotionally, or sexually
- Not engage in a sexual relationship with adults at risk and adults in need of care for whom they are responsible.
- Maintain confidentiality about sensitive information.
- Respect and listen to the opinions of all.
- 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/time keeping), remember people learn by example.
- Refrain from smoking and consumption of alcohol during activities or sessions
- Never condone rule violations, rough play, or the use of prohibited substances
- Not spending excessive amounts of time alone with participants unless there are exceptional circumstances.
- Never take an “adult at risk or an adult in need of care” to their home or travel alone with them.
- Not administering First Aid involving the removing of an individual’s clothing unless in the presence of others
- Hold appropriate valid qualifications and insurance cover.
- Make activity fun.
- Adhere to the Club’s Social Media policy at all times.

Staff and volunteers have the right to:

- Access on-going training and information on all aspects of leading/managing. activities for adults at risk and adults in need of care particularly on safeguarding.
- Support in the reporting of suspected abuse or poor practice.
- Access to professional support services.
- Fair and equitable treatment by “the Company”.
- Be protected from abuse by children, young people, other adults, and parents.
- Not to be left vulnerable when working with adults at risk and adults in need of care.

Any minor misdemeanours and general misbehaviour will be dealt with immediately and reported verbally to the Senior Safeguarding Manager. Serious or persistent breach of the code will result in disciplinary action and could lead to dismissal from “the Club.” Refer to “the Club’s” Whistleblowing policy and Grievance and Disciplinary policies.

Emergency Action and First Aid

All coaches, leaders and members should be prepared with an action plan in the event of an emergency and be aware of our First Aid Procedures. (Management of Health and Safety at Work regulations 1999) (Appendices 7 and 8) This will include:

- Access to First Aid equipment.
- Telephone contact if the participant is a minor.
- Telephone contact to the Emergency Services.

Procedures

Management of safeguarding cases

Remember Adult safeguarding should be person led and outcome focused.

General principles of case management

1. Where, in a sport context, any issue arises in relation to adults at risk and adults in need of care it should be dealt with immediately.

2. Any investigation or inquiry is to proceed upon the basis that the primary consideration will be a determination of the risk posed to the adult(s) at risk and adult(s) in need of care.
3. Unless the determination finds no, or an insignificant, risk, effective steps must be taken to manage or reduce the risk.
4. Individuals about whom there are concerns should be treated fairly and honestly and should be provided with support throughout the process.

Investigation

5. Every investigation or inquiry must be sensitive to the welfare of the adult(s) at risk and adult(s) in need of care during its processes and, at all times, hold central the need to keep the interests of those directly involved as paramount.
6. Where issues other than risk to adults at risk and adults in need of care are under consideration in any investigation or inquiry, such issues must remain subordinate to the requirement to determine the risk posed to other participants.

Risk assessment

7. The assessment of risk involves consideration of the actual or potential harm that an individual poses to adults at risk and adults in need of care.
8. The assessment of risk does not involve making a finding based upon either the criminal or civil standards of proof (i.e., certainty or “the balance of probabilities”). The assessment requires a defensible decision that a risk does or does not exist and, where it does, a determination of the extent of such risk.
9. Save in exceptional cases, the assessment will not require the production of a formal risk assessment report.

Risk management

10. The steps taken to address any perceived risk to adults at risk and adults in need of care must have regard to the nature and extent of the risk as well as to any particular and relevant aspects of the activity in question and, in the light of this, must seek to ensure that such steps will be effective.
11. In cases where the perceived risk is low, and no criminal or disciplinary charge could be made out, it may be nonetheless necessary to impose stringent restrictions on an individual or remove his/her ability to participate in the activity in question.

Responding to Disclosure

If an adult at risk or adult in need of care informs a member of staff directly or a member of staff identifies that they are concerned about someone's behaviour towards them, this is known as a disclosure. This disclosure may be relating to an incident or incidents either during “the Company” activity, or outside of the activity environment. The person receiving the disclosure should:

- React calmly so as not to frighten the individual.
- Remember to make safeguarding personal. Discuss the concerns with the adult, obtain their view of what they would like to happen. Inform them that it is your duty to pass on concerns.

- If the individual needs immediate medical treatment, telephone for an ambulance, inform doctors of concern and ensure they are aware that is an adult safeguarding issue (as outlined in the referral procedure diagram Appendices 5 and 6).
- Ensure the immediate safety of the individual in question. If the matter is urgent contact the emergency services/police.
- Re-assure the individual but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.
- In the event of suspicion of sexual abuse do not let the adult bath or shower until given permission to do so. Washing can destroy evidence.
- Keep the individual informed of actions and ensure you consider their needs at all times.
- Make a note of what the person has said as soon as is practical using “My concern”) Use their own words where possible. Raise your concern with the safeguarding team as soon as you are able (within 24 hrs). Remember the need to be confidential. Include only fact not opinion.

In the event of a disclosure, staff should not:

- Dismiss the concern.
- Panic
- Allow your shock or distaste to show.
- Speculate or make assumptions.
- Make negative comments about the alleged abuser.
- Make promises or agree to keep secrets.
- Ask the person 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.

Other Disclosures

There may be instances where a fellow member of staff, friend, or carer of an adult at risk or adult in need of care or support may disclose a concern about their welfare.

In this instance the same protocol should be followed regarding reporting procedures, and it should be made clear on the referral form by whom the disclosure was made.

This Safeguarding Adult Policy should be made available for all key stakeholders upon request, to ensure individuals and other Clubs are aware of the “the Company” reporting procedure for safeguarding concerns.

Consent

When making an adult referral to the Adult Safeguarding team or MASH team (Multi-Agency Safeguarding Hub) consent should be sought where possible from the adult at risk.

Individuals may not give their consent for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view.

If they still do not consent, then their wishes should usually be respected. There are, however, circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people, or a serious crime has been committed. Always discuss this with the Senior Safeguarding Manager (SSM).

Reporting Procedure

All allegations or suspicions and concerns are to be treated seriously. No abuse is acceptable. Some Safeguarding concerns may indicate a criminal offence and must be reported to the Police as soon as possible.

It is the responsibility of the individual employee or volunteer to take a lead on reporting all concerns to “the Clubs” Designated Safeguarding Officer. The individual employee should assist in any further action required on behalf of the Club. A copy of the referral process for staff and volunteers is available in Appendices 5 and 6.

Information should be shared with the Senior Safeguarding Manager, who must approve of any actions to be taken and any documentation or correspondence being sent out.

Employees with concerns should discuss them with the Designated Safeguarding Manager immediately. If the Designated Safeguarding Officer is not available, then any concerns should be discussed with the Senior Safeguarding Manager who will then seek advice, if necessary, from other nominated welfare professionals (Bristol City Council Adult team/ MASH team, Football League, and the Football Association).

Volunteers with concerns should discuss these discreetly with their coordinator or the Designated Senior Safeguarding Officer as soon as possible after the abuse or suspicions of abuse are observed. If unavailable, then any concerns should be discussed directly with the Senior Safeguarding Manager.

Concerns about colleagues should be addressed initially with the Designated Safeguarding Officer, but if this is not possible or the concern is about the Designated Safeguarding Officer then speak directly to the Senior Safeguarding Manager or Bristol City Council LADO, Bristol County FA or the Football League. The anonymous reporting link found on Club website is:

<https://form.thesafeguardingcompany.com/57bdb1ef-c410-4fa6-8310-8078f1f033d4>

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

Low level Concerns

These are concerns that may not meet the harm threshold or need a referral to an outside agency but that may cause a sense of unease or a “nagging doubt”. These could be related to a member of staff being inconsistent with the “Code of Conduct.”, inappropriate outside work, over friendly with children, taking photographs on mobile phones, general poor practice around children and young people.

“the Company” promotes an open and transparent culture in which all concerns about adults working in or on behalf of “the Company” are taken seriously, dealt with promptly and appropriately. This will minimise the risk of abuse, identify inappropriate, problematic or concerning behaviors and set clear professional boundaries which reflect the ethos and values of “the Company”.

All low-level concerns should be recorded promptly on “My Concern”. These will be reviewed, categorised and a course of action identified by the Senior Safeguarding Manager in consultation with the Designated Club Safeguarding Officer.

Information Sharing

If there is a reasonable concern that an adult at risk or adult in need of care or support may be at risk of significant harm this will always override a professional agency requirement to keep information confidential.

If “the Company” is approached about sharing information, the following will be considered:

- What information do they need?
- Why do they need it?
- What they will do with the information?
- Who else needs to be informed if concerns about the individual persist?

If we are asked to provide information, we will never refuse solely on the grounds that all information is confidential.

“The Company” will consider:

- What information the individual in question has given permission to use
- Any perceived risk to the individual which would warrant breaching confidentiality.
- Any relevant information on risk to the individual, which would allow another agency to offer appropriate help and services or take action to reduce risk to the child.
- Whether to ask advice from Bristol City Council or Bristol County FA or the Football League Welfare Officers

“The Company” will record when, what, why, and with who information has been shared; or why sharing was refused. This will be recorded as “the Company” may be required to justify reasons at a later date.

Staff should always seek advice if unsure and never refuse to provide information without considering the risks of not sharing. All decisions on information sharing will ultimately fall with “the Club’s” Senior Safeguarding Manager.

Guidance for referrals

Bristol

- Care Direct 0117 922 2700
- [www. Bristol.gov.uk](http://www.Bristol.gov.uk)
- In an Emergency phone 999 or 101

Bath

- Office hours 01225394200
- Out of office 01454615165
- www.bathnes.gov.uk

Cardiff and Vale of Glamorgan

- Office hours 01446700111
- Out of hours 02920788570
- cardiffandvalersb@cardiff.gov.uk

South Gloucestershire Referrals

- Office hours 01454868007
- CSODesk@southglos.gov.uk

North Somerset Referrals

- Care Connect 01275888801
- Out of hours 01454615165
- www.nscphealth.co.uk/tsafeguarding-adults

Warwickshire Referrals

- Office hours 01926 410410
- Out of hours 01926886922
- <http://www.warwickshire.gov.uk/safeguardingadults>

Worcestershire Referrals

- Office hours 01905 768053.
- www.worcestershire.gov.uk/info

Additional contact numbers can be found on page 38.

When making a referral regarding adult protection concerns, it is important to have the following information wherever possible readily available for the duty social worker:

- Name, date of birth, ethnic origin, gender, address, and telephone numbers
- The reasons for your concern
- Injuries and/or other indicators observed.
- The adult's first language
- Details of any specific needs of the adult e.g., disability, etc.
- Details of family members, if known
- Other agencies, professionals involved.
- Family doctor

Staff in Adult Safeguarding team/ MASH teams will make enquiries with other agencies who may have information regarding the adult and family. On the basis of the information gathered, they will then make an initial assessment on what further action is necessary or appropriate.

Whenever MASH teams receive information about a possible criminal offence against an adult, they will share the information with the Police at the earliest opportunity and a decision will be made jointly on how to proceed with the enquiries.

Following the referral of an adult, the referrer and the Adult Safeguarding team/MASH team must be clear about who will be taking what action.

Professionals who contact a Safeguarding team to make a referral must confirm the details of this in writing within 24 hours addressed to the team for that locality, using the correct referral form.

The team should acknowledge a written referral within one working day of receiving it, so if we have not heard within three working days, contact the MASH team again.

The Senior Safeguarding Manager for “the Company” is: Melissa Dray

Tel: 07880140411
melissa.dray@bcfc.co.uk

The Senior Board Member for the “Club” is: Hannah Haynes

hannah@mercury13.com

Other key contacts are:

Gloucestershire FA Designated Safeguarding Officer – Liz Barnett 07960500130

Somerset Designated Safeguarding Officer- Shirley Needham 01458837034/07535664988

The English Football League Welfare Officer – Alex Richards 01772325940

Useful Contacts/Support

If you have concern that an adult at risk or adult in need of care or support is being harmed as a result of abuse or neglect, you must not keep these concerns to yourself. Keeping children and vulnerable adults safe is everyone's responsibility.

Staff must ensure that they speak to the appropriate staff member in “the Company” who can listen to and record the concerns, and then take appropriate action.

Useful contacts

- NSPCC Helpline 0808 800 5000
- ChildLine 0800 1111 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org

Appendix 1

Neglect

This is when adults consistently or repeatedly fail to meet an individual's or their own basic physical and/or psychological needs which could result in the serious impairment of their own or an individual's health or development e.g., failure to provide adequate food, shelter and clothing; failing to protect someone from physical harm or danger; or the failure to ensure access to appropriate medical care or treatment. It may also include refusal to give love, affection, and attention. Self-neglect covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviours such as hoarding.

Neglect in sport or physical activity could include a coach or other member of staff repeatedly failing to ensure people are safe, exposing them to undue cold, heat or extreme weather conditions without ensuring adequate clothing or hydration; exposing them to unnecessary risk of injury e.g. by ignoring safe practice guidelines, failing to ensure the use of safety equipment, or by requiring participants to join in when injured or unwell.

NEGLECT	
Examples include	Signs include
<ul style="list-style-type: none"> • Inability to carry out daily living tasks. • Ignoring medical and physical care needs • Failing to have access to health, social or educational support. • The withholding of medication, nutrition, and heating • Keeping someone in isolation. • Failure to intervene in situations that are dangerous to the adult. Inadequate supervision and guidance – leaving the adult at risk to cope alone, abandoning them or leaving them with inappropriate carers and failing to provide appropriate boundaries about behaviours such as underage sex or alcohol. 	<ul style="list-style-type: none"> • Constant hunger, sometimes stealing food from others. • Dirty or 'smelly' -deterioration in hygiene. • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time. • Having few friends • Worsening of health conditions • Mentioning their being left alone or unsupervised. • Skin infections • Lack of response to stimuli or contact • Poor skin condition(s) • Anxiety • Distressed • Little or no distress when separated from their carer. • Inappropriate emotional responses • Language delay

Physical Abuse

When someone physically hurts or injures another person by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning or otherwise causing harm. Physical harm may also be caused when an adult or carer feigns the symptoms of, or deliberately causes, ill health to someone they are looking after.

Physical abuse in sport or physical activity may be when the nature and intensity of training or competition exceeds the capacity of the participant; where coaches encourage the use of drugs or harmful substances to enhance performance; if athletes are required to participate when injured; or when sanctions used by coaches imposed involve inflicting pain.

PHYSICAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Shaking • Pinching • Slapping • Force-feeding • Biting • Burning or Scalding. • Causing needless physical discomfort • Inappropriate restraint • Locking someone in a room • Threatening behaviour from another participant • Blaming for poor performance 	<ul style="list-style-type: none"> • Unexplained bruising, marks, or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered. • Fear of parents or carers being approached for an explanation. • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather. • Depression • Withdrawn behaviour or other behaviour change. • Running away from home/ residential care • Distrust of adults, particularly those with whom a close relationship would normally be expected. • Lack of medical attention when an injury is present. • Self-harm

Sexual Abuse

This is where adults are abused by adults (both male and female) or other adults who use them to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, kissing and sexual fondling. Showing individuals pornographic material (books, videos, pictures) or taking pornographic images of them are also forms of sexual abuse.

In sport or physical activity, coaching techniques which involve physical contact with others can create situations where sexual abuse can be disguised and may therefore go unnoticed. The power and authority of, or dependence on, the coach if misused, may also lead to abusive situations developing. Contacts made within sport and pursued e.g., through texts, Facebook or Twitter have been used to groom vulnerable adults for abuse.

SEXUAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Rape and other sexual offences • For vulnerable adults, sexual activity including sexual contact and non-sexual contact that the person does not want, to which they have not consented, could not consent, or were pressured into consenting to. • Being encouraged or enticed to touch the abuser. • Coercing the victim into watching or participating in pornographic videos, photographs, or internet images • Any sexual relationship that develops where one is in a position of trust, power or authority. 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas. • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down. • Pregnancy • Sudden or unexplained changes in behaviour, e.g., becoming aggressive or withdrawn. • Fear of being left with a specific person or group of people. • Nightmares • Leaving home/ residential care • Sexual knowledge which is beyond their development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self- harm or mutilation, sometimes leading to suicide attempts. • Eating problems such as overeating or anorexia

Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of an individual so as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on someone or even the over protection of an individual. It may involve causing people to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the person very nervous and withdrawn. Some level of emotional abuse is involved in all types of ill-treatment of a vulnerable adult.

Emotional abuse in sport or physical activity may occur if people are subjected to constant criticism, name-calling, sarcasm, bullying, racism or pressure to perform to unrealistically high expectations; or when their value or worth is dependent on sporting success or achievement.

EMOTIONAL/PSYCHOLOGICAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none">• Intimidation and/or threats• Bullying• Rejection• Shouting• Indifference and the withdrawal of approval• Denial of choice• Deprivation of dignity or privacy• The denial of human and civil rights• Harassment• Being made to fear for one's wellbeing.• Blaming• Controlling• Verbal abuse	<ul style="list-style-type: none">• A failure to thrive or grow• Sudden speech disorders• Developmental delay, either in terms of physical or emotional progress• Behaviour change• Being unable to play or socialise with others.• Fear of making mistakes• Self-harm• Fear of family or carer being approached regarding their behaviour.• Confusion

Additional Welfare Considerations

Poor Practice

Poor practice is behaviour of an individual in a position of responsibility which falls below "the Club's" required standard. Poor practice may not be immediately dangerous or intentionally harmful to an individual, however is likely to set a poor example.

Poor practice is potentially damaging to the individual, "the Company" and to those who experience it. For example, leading a group with alcohol on the breath, smoking, swearing in front of others, or not paying due care and attention to participants all constitute poor practice.

Poor practice can sometimes lead to or create an environment conducive to more serious abuse. It may also lead to suspicions about the individual's motivation, even where no harm is intended. For example, if a member of staff is giving one person too much attention, regularly transports participants in their car, or encourages physical contact without obvious justification.

Bullying

Bullying by peers can occur whenever children and young people come together. Bullying can take many forms and is harmful to the victim. It may be physical e.g., hitting; online or cyber e.g., abusive messages, comments, or images on social media; involve damage or theft of property; based on someone's gender, ethnicity, sexuality or disability; or about their physical ability.

More detail on recognising and managing instances of bullying can be found in "the Club's" Anti-Bullying Policy.

Cyberbullying

This is defined as the use of technology to harass, threaten, embarrass, humiliate, spread rumours, or target another person. Refer to "the Club's" "Acceptable IT use policy". Bullying because of discrimination occurs when motivated by prejudice against certain people because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation, or disability.

Sexting

This is where a person sends or receives sexually explicit or suggestive images. (See Appendix 10)

Grooming

Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation, or trafficking. Grooming can happen both online and in person.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children and/or adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

Female genital mutilation (FGM)

Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls or women. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK or to take girls who are British nationals or permanent residents in the UK abroad for FGM.

Hazing

Any rituals, initiation activities, action or situation with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of vulnerable groups.

Infatuations

Vulnerable groups may develop an infatuation with a member of staff who works with them. There is a high risk that words or actions may be mis-interpreted, and allegations made against staff.

Domestic violence/coercive control

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 Yrs. or above, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called "honour" based violence.

Forced Marriage

A marriage in which one or both spouses do not consent to the marriage and duress is involved. This is different from an arranged marriage where both parties agree. A forced marriage is a criminal offence (The Anti-social Behaviour, Crime and Policing Act 2014) and can result in up to 7yrs in prison. The forced marriage of adults with learning difficulties occurs when the adult does not have the capacity to consent to the marriage.

Modern Slavery

This 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.

Organisational Abuse

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

Mate Crime

This is defined by the Safety Net Project as "when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative impact on the individual." It is carried out by someone the individual knows and often happens in private.

Prevent

This is part of the government’s counter terrorism strategy and addresses all forms of dangerous extremism including Islamist extremism and far right extremism.

Prevent aims to:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- prevent people from being drawn into terrorism and to ensure they are given appropriate advice and support.
- work with sectors and institutions where there are risks of radicalisation that we need to address.

There are specific statutory obligations under Prevent for organisations such as the “Club” to provide training for all staff and players.

Additional Risks to Vulnerable Adults

With vulnerable adults being classed as 18+, there are additional risks relating to financial, legal and discriminatory matters.

FINANCIAL ABUSE (Vulnerable Adults)	
Examples include	Signs include
<ul style="list-style-type: none"> • Being over charged for services • Being tricked into receiving goods or services that they do not want or need. • Inappropriate use, exploitation, or misappropriation of property and/or utilities • Theft • Deception • Fraud • Exploitation or pressure in connection with wills 	<ul style="list-style-type: none"> • Lack of basic requirements e.g., food, clothes, shelter • Inability to pay bills. • Unexplained withdrawals from accounts. • Inconsistency between standard of living and income • Reluctance to take up assistance which is needed. • Unusual interest by family and other people in the person’s assets • Recent changes in deeds • Power of Attorney obtained when person lacks capacity to make the decision.
DISCRIMINATORY	
Examples	Signs
<ul style="list-style-type: none"> • Use of inappropriate “nick names” • Use derogatory language or terminology. • Enforcing rules or procedures which undermine the individual’s wellbeing. • Denial to follow one’s religion. • Lack of appropriate food • Denial of opportunity to develop relationships. • Denial of health care 	<ul style="list-style-type: none"> • Being treated unequally from other users in terms of the provision of care, treatment, or services • Being isolated • Derogatory language and attitude by carers • Dismissive language by staff • Hate campaigns by neighbours or others. • Deteriorating health • Indicators of other forms of abuse

Appendix 2

Wellbeing Principle

The concept of wellbeing is threaded throughout the Care Act 2014 and is relevant to adult safeguarding in sport and activity. The Act sets out broad categories that contribute to a sense of wellbeing. “The Company” endorses these themes and seeks to ensure that adult participants can take part fully in all sports.

- Personal dignity (including treatment of the individual with respect).
- Physical and mental health and emotional wellbeing.
- Protection from abuse and neglect.
- Control by the individual over their day-to-day life.
- Participation in work, education. Training and recreation.
- Social and economic wellbeing.
- Domestic, family and personal domains.
- Suitability of the individual’s living accommodation.
- The individual’s contribution to society.

Making Safeguarding Personal

The safeguarding process places a stronger emphasis on achieving satisfactory outcomes that take into account the individual choices and requirements of everyone involved. Adults should be more involved in the safeguarding process. Their views, wishes, feelings and beliefs must be taken into account when decisions are made.

The Care Act 2014 builds on the concept stating, “we all have different preferences, histories, circumstances and lifestyles”.

The Act is also clear that there are key issues that should be taken into account when abuse or neglect are suspected, and that there should be clear guidelines regarding this.

<https://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/making-safeguarding-personal>

Capacity

The issue of capacity or decision making is a key one in safeguarding adults.

It is important to recognize that some people are only able to make some decisions, and a small number of people cannot make any decisions. This is known as “lacking capacity”.

To make a decision we need to:

- Understand information.
- Remember it for long enough.
- Think about the information.
- Communicate the decision.

A person’s ability to do this may be affected by issues such as learning disabilities, dementia, mental health, brain injury and physical ill health.

The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides a framework for this to happen. It is about making sure that people over the age of 16 years have the support they need to make as many decisions as possible.

The MHA also protects people who need family, friends, or paid support staff to make decisions for them because they lack capacity.

Capacity is seen by the MCA as decision-specific, so no one will be labelled as entirely lacking capacity.

Remember you should not discriminate or make assumptions about someone's ability to make decisions on the basis of age, appearance, condition or behavior.

Appendix 3

What to do if you are worried an adult is being abused

Discuss with Senior Safeguarding Manager

Melissa Dray

For advice prior to referral call
Melissa Dray
Senior Safeguarding Officer
07867868912

Gloucestershire FA
Designated Safeguarding Officer

01454615888

Safeguarding Officer EFL
Alex Richards
01772325940

FA Case Management Team
Investigation Team
0800 169 1863

F/A NSPCC Helpline
0808 800 5000

DSO: Refer Concern to
County Welfare Officer
and/or Police and/or
Children Services if required
and FA Case Management

Follow up in writing within 24
hours on a Referral Form.
Keep a copy (and secure) of
all documentation

Agency should acknowledge
receipt of referral and decide
on next course of action

Further
enquiry/investigation by
appropriate agency

No Longer has a concern

No Further Action
A record should be kept of your
concern and the action taken

NO FURTHER ACTION

**Concern about an adult's
immediate safety**

**Police
Call 999**

Emergency Adult Services
Duty Team
01179222700

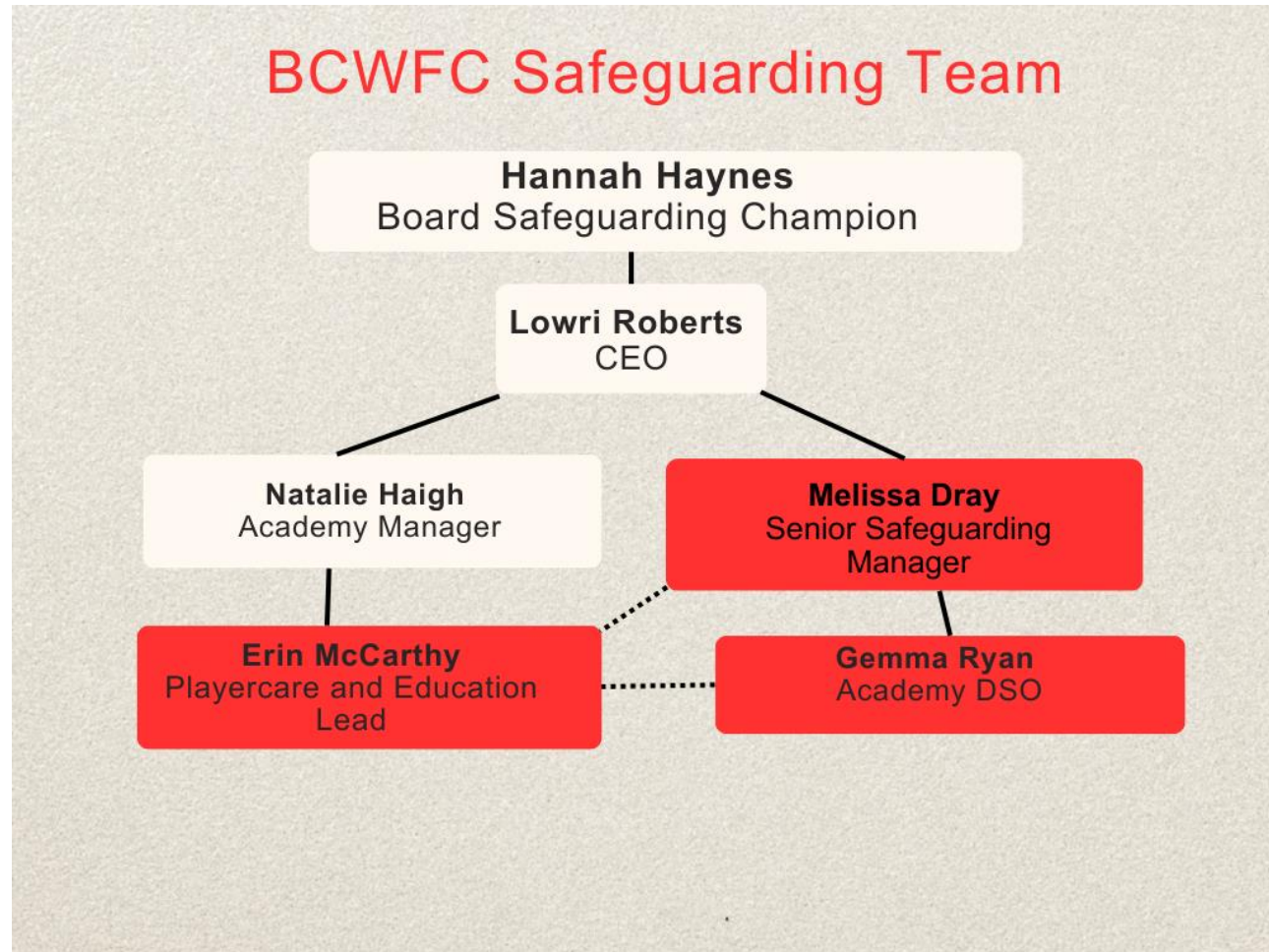
FA Case Investigation Unit 0800
169 1863

Police (see above)

Adults Services (see above)

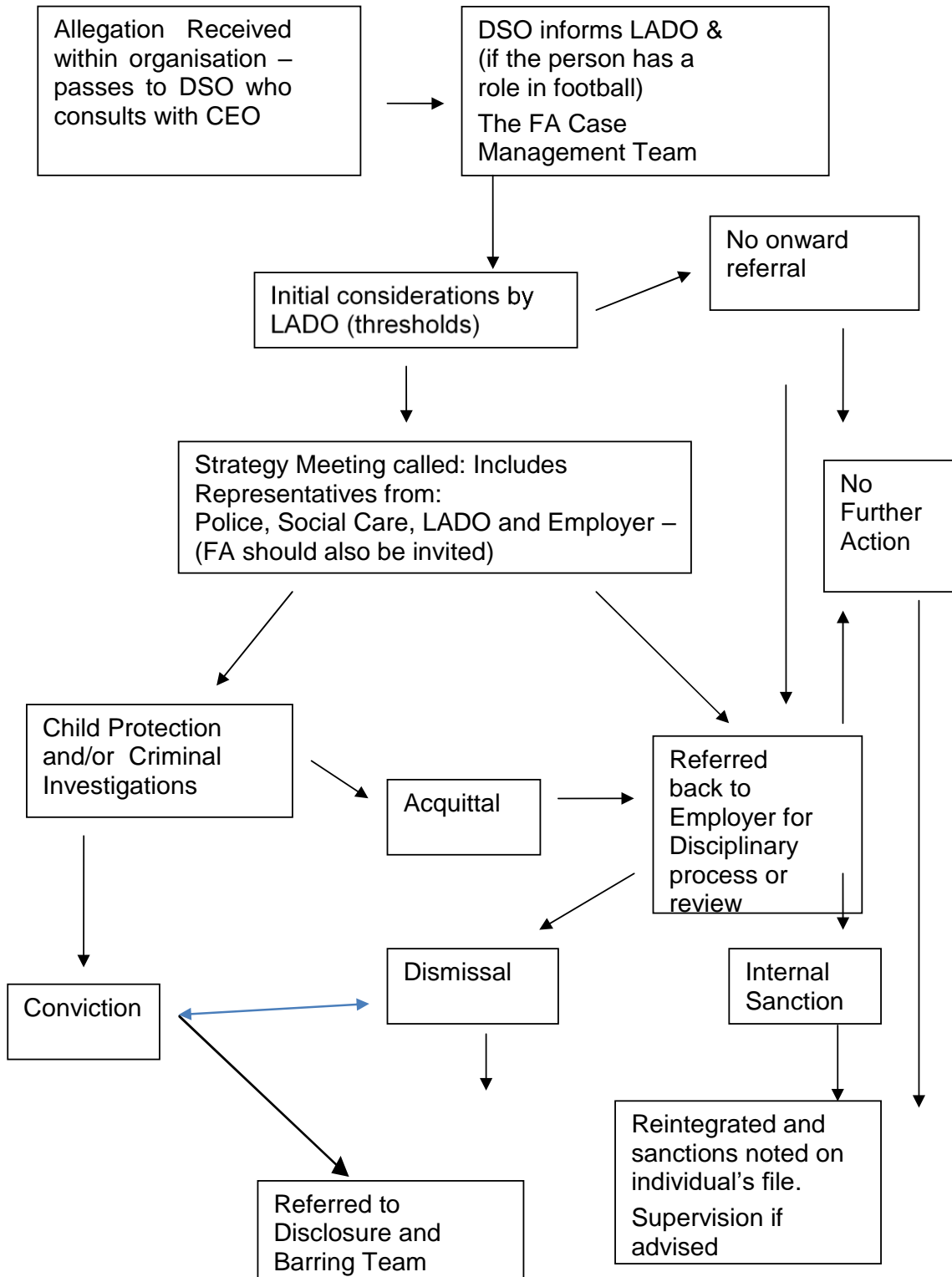
SUSPENSION/PROSECUTION

Appendix 4



Appendix 5

A serious Safeguarding allegation management flow-chart



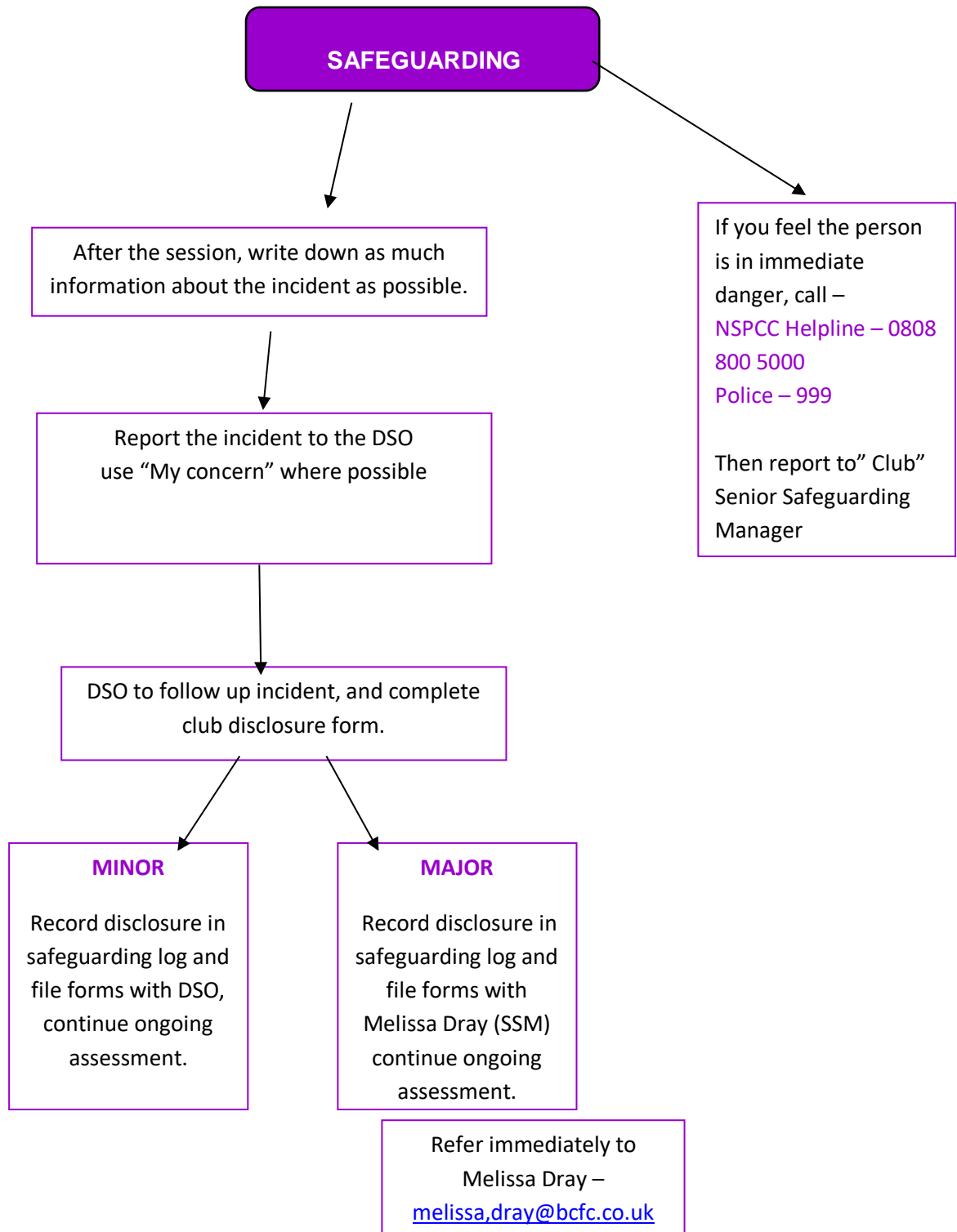
The FA and EFL Safeguarding team
to be informed of the final outcome within 48 hours.

October 2017

20/02/2026

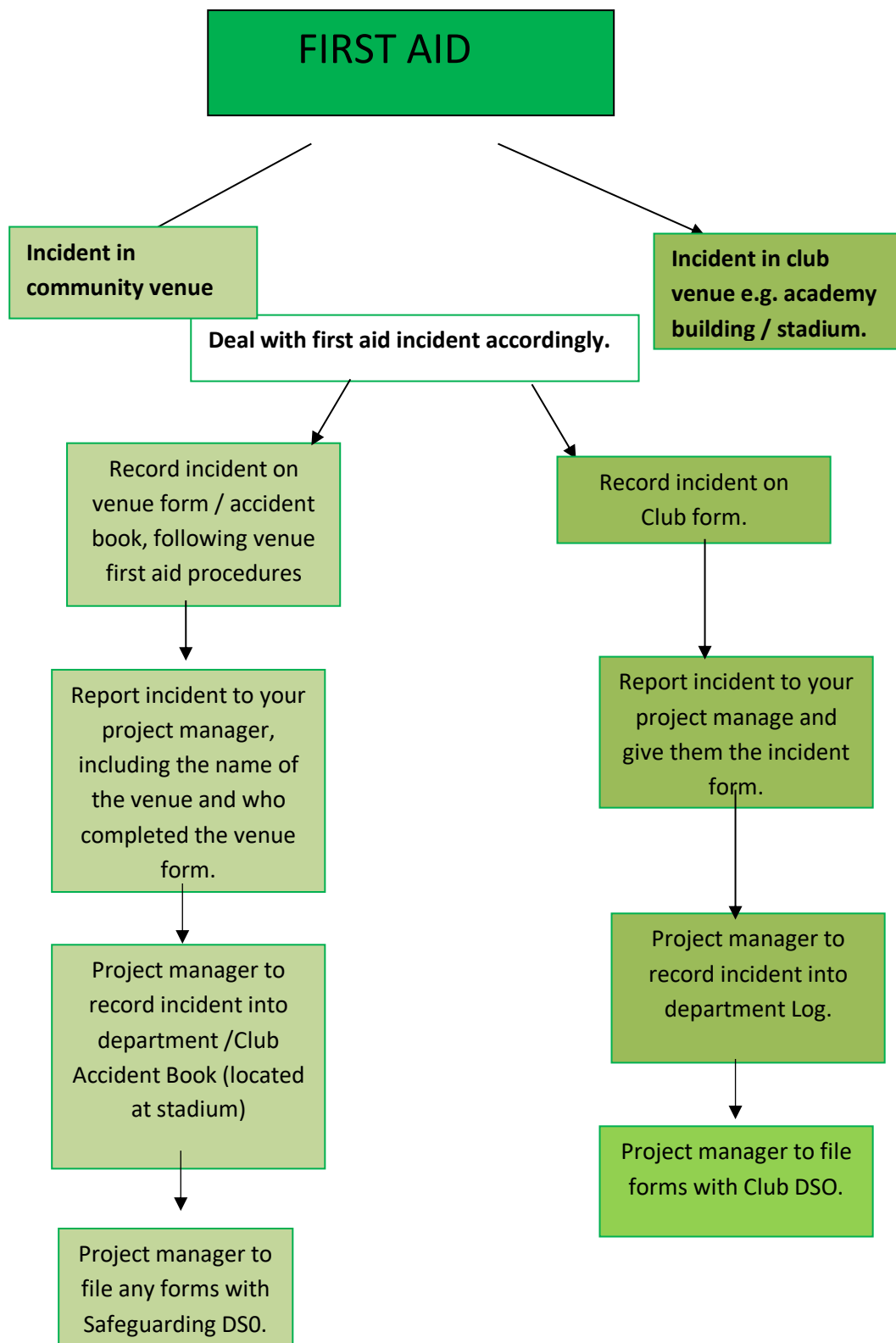
Appendix 6

Incident reporting flow-chart



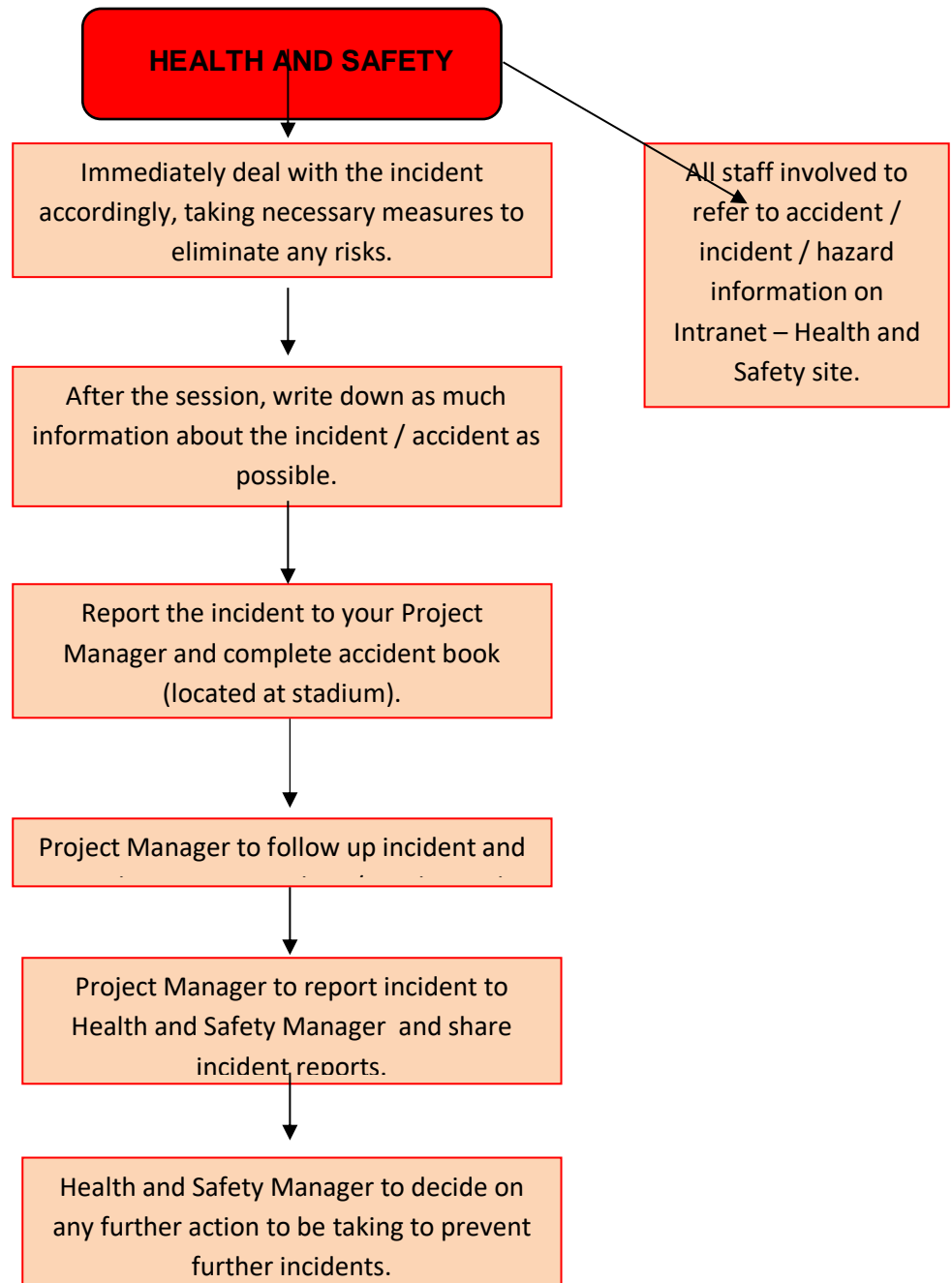
Appendix 7

First Aid Reporting Flow Chart



Appendix 8

Incident / Accident reporting flow-chart



Appendix 9 Staff Personal Media Guidance and Procedures

Guidance for Staff

DO:

- -gain written parent / carer permission before giving access to U18.
 - explain to the parent/carer/player the method of communication to be used and the reasons.
- -always use group texts or emails and always copy parents/carers and the designated member of Safeguarding team into all communications with young people.
- -make sure texts, emails are only in relation to specific “Club” related activities.
- -Report to DSO/SSM any inappropriate communication from a young person.
- **DO NOT:**
 - use your personal phone to text a young person connected with the “Club”.
 - become friends with, follow, or add to your personal social media network any potential, current or former young person (U18) This includes use of “like”.
 - use internet or web-based communications to send personal messages of a non-football nature to a child or young person. This includes “banter” or comments.
- -use language that is directly or could be misinterpreted as being racist, sexist, derogatory, threatening, abusive or sexualised in tone.
- -use the “Club” user- name for personal use.
- Any of the above could lead to abuse of a position of trust and breach the standards of professional behaviour and conduct expected by the “Club” and could be the subject of disciplinary procedures.
- **The “Club” will.**
- -ensure all privacy settings are locked so that the pages are used explicitly for “Club” matters and not as a place to meet or have private conversations.
- -monitor social networking pages regularly and where appropriate, raise any concerns or disciplinary matters.
- Please refer to the “Club” policy on Acceptable use of IT and IT and Internet use policy
- Remember your Induction training and the “Club” Safeguarding code of conduct.

Appendix 10 Procedures for Youth Produced Sexual Imagery

Guidance for staff

Definitions:

“Youth produced “means young people sharing images that they, or another young person have created of themselves.

“Imagery “means both still and moving videos.

Description:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person with a peer under the age of 18 or an adult.

A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is “indecent”. This includes imagery of yourself if you are under 18. **Note that the sharing of sexual imagery of people under 18 by adults constitutes sexual abuse and will lead to an immediate police referral.**

What should you do?

- **You should NOT view the imagery.**
- Refer the incident to the Club DSO or SSM as soon as possible and within 24 hrs.

What will happen next?

- The DSO will hold an initial review meeting with appropriate staff.
- Subsequently there will be interviews with young people involved (if appropriate)
- Parents will be involved as soon as possible (unless there is a definite reason not to).
 - If at any stage it becomes apparent that a young person has been harmed or at risk of harm or that a criminal offence may have been committed the SSO will make a referral to the Police or Social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed.

At all times the victim’s well- being will be of paramount importance.

Appendix 11 Procedures for Youth produced sexual imagery

Guidance for players

Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is “indecent”. This includes imagery of yourself if you are under 18.

You must not:

- create and share with anyone any sexual images-photos or videos- of yourself.
- share sexual images-photos or videos-with any other whether they are under the age of 18 or not.
- be in possession of sexual images-photos or videos- created by another person under the age of 18.
- be in possession of any sexual image-photos or videos- sent to you by an adult.

If any of the above should happen, please speak immediately to a person you trust or Head of Safeguarding and Welfare. You should not show the imagery to anyone else.

What will happen next?

- The person you have spoken to will tell the Head of Safeguarding and Welfare.
- If appropriate The Head of Safeguarding and Welfare will speak with you.
- Parents will be involved as soon as possible (unless there is a definite reason not to).

If at any stage, it becomes apparent that you or another young person has been harmed or is at risk of harm the Head of Safeguarding and Welfare will make a referral to the Police or Social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed.

Remember we are there to help and support you.

If you feel unable to talk to anyone at the Club, you can get help by contacting;

www.clickCEOP.net

NSPCCHelpline 0808 800 5000

Appendix 12

Match Days

On match days the stadium is in the control of the Head of Safety and Security Jen Reay or her nominated deputy. Anyone who has a concern for the safety and well-being of an adult at risk or an adult in need of care should immediately contact the control room. The Head of Safety and Security will then alert the Senior Safeguarding Manager who will attend the incident and advise on any appropriate action including police liaison.

Stewards with appropriate training will be allocated to members of the public who are considered “vulnerable” many of whom are situated in the disabled bays. Specific stewards with DBS checks will be responsible for supporting the SSM and will be advised to do so by the Head of Safety and Security.

Ejections

In the case of a supporter being an adult at risk or an adult in need of care the control room must be informed immediately. No adult at risk or an adult in need of care should be ejected from the ground until the SSM has attended and a responsible adult or carer has been contacted.

Searching

The “Club” has a clear searching policy which sets out the correct protocols for searching vulnerable adults. All stewards are aware of the policy and receive additional training.

Appendix 14

Other safeguarding contacts

While any safeguarding concern should be raised with the club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate. Below are the contact details for other partners with whom safeguarding concerns in relation to “the Company” can be discussed:

Football

The English Football League Safeguarding Team

Tel: 01772 325940

Email: safeguarding@efl.com

The FA Safeguarding Team

Tel: 0800 169 1863

Email: Safeguarding@TheFA.com

Appendix 15

Procedures and safety measures for online learning

“The Company” expects all staff and players to adhere to the relevant policy boundaries which must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:

- All contact online being observable and interruptible.
- Staff and children must wear suitable clothing as should anyone else in the household.
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred.
- Online teaching will not be carried out on a one-to-one basis and will be done in a group setting with several players present.
- Another adult will be invited to be present in the room.
- All communication provided will have an educational purpose.
- Language must be professional and appropriate, including from any family members in the background.
- “The Company” will record online teaching/instruction sessions. Players and parents will be informed that sessions are being recorded in advance of doing so.
- All sessions provided will be via “the Company” I.T platform (for example remote desktop) or Wi-Fi (where possible)

Online safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this social distancing period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

UK Safer Internet Centre	https://reportharmfulcontent.com/
CEOP	https://www.ceop.police.uk/safety-centre/
Internet Matters	https://www.internetmatters.org/
NetAware	https://www.net-aware.org.uk/
ParentInfo	https://parentinfo.org/
ThinkuKnow	https://www.thinkuknow.co.uk/

Appendix 16

Additional contacts for adults at risk

Mental health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact “the Company” safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans	https://www.samaritans.org	Tel: 116 123
ChildLine:	https://www.childline.org.uk	Tel: 0800 1111
NSPCC:	https://www.nspcc.org.uk	Tel: 0808 800 5000
Mind:	https://www.mind.org.uk	Tel: 0300 123 3393
PFA:	https://www.thepfa.com/wellbeing	Tel: 07500 000 777

References

Other policies associated with Safeguarding and not mentioned in this policy:

- Use of photography and film.
- Disciplinary.
- Complaints.

Legislation and statutory guidance referred to:

- Health and Safety at work Act 1974
- Management of Health and Safety at work Regulations 1999
- Modern Slavery Act 2015
- Counter terrorism and Security Act 2015
- Sexual Offences Act 2003
- Mental Capacity Act 2005
- Safeguarding Vulnerable groups Act 2006
- Deprivation of Liberty Safeguards 2009
- Disclosure and Barring Service 2013
- The Care ACT 2014
- Making Safeguarding Personal Guide 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Human Rights Act 1998

Additional reference materials:

- Whistleblowing
- Social media
- Safer Recruitment
- Health and Safety



Document review

Date reviewed	Position	Owner
Jan 2020	Executive Board	M.A.Martin
Jan 2021	Executive Board	
Jan 2022	Executive Board	
Jan 2023	Executive Board	
Mar 2024	Executive Board	
August 2025	Executive Board	
Feb 2026	Executive Board	Melissa Dray