



Safeguarding Adults at Risk Policy & Procedures

Prepared by: Matthew Jarvis, Welfare Officer

Approved by: Approved by Oxford United FC, Technical Board.

Resources:

The FA.com

Review date: July 2021, Reviewed by All Welfare Officers

Oxford United Football Club Limited will review this policy annually. However, the policy is under constant review and will be monitored and changed when there is an organisational change, change in legislation or following any learning outcomes from safeguarding incidents, concerns or allegations.



1 ABOUT THIS POLICY

1.1 The Board is committed to continually ensuring the well-being and safety of all adults directly connected with our business activities, and to providing a safe and suitable environment for all those adults at risk attending our premises for any purpose. It is the duty of all working in the Club to safeguard the welfare of Adults at risk by creating an environment that protects them from harm.

1.2 This policy applies to all staff members of the business, including full time, part time, casual or pieceworker as well as any Consultants and Volunteers who working within the parameters of those at risk groups of staff, customers or clients. All staff members, Consultants and Volunteers are required to adhere to this policy.

1.3 The Board may amend this policy at any time. The Board will continue to review this policy to ensure it is achieving its aims.

1.4 This policy applies to the Club and its parent company and all subsidiary companies. It applies to all locations owned or operated by the Club including satellite academies.

1.5 Failure to comply with this policy may be treated as misconduct and dealt with under our Disciplinary Procedure and if a breach amounts to gross misconduct this may result in dismissal and possibly criminal prosecution.

1.6 The Board of Oxford United Football Club (“**OUFC**”) acknowledges and accepts it has a responsibility for the well-being and safety of all who are under the OUFC’s care or using its facilities.

1.7 The well-being of adults at risk is paramount for all staff and accordingly, they must make themselves aware of this policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

1.8 OUFC works closely with the Local Authority Designated Officers for adults at risk. The Club Safeguarding Officer liaises with the respective safeguarding teams for advice, guidance and referrals. The Welfare Officer will be guided by and adhere to Local Authority and Police protocols.

1.9 All Staff; full time, part time, casual, piece worker, consultants and volunteers have the responsibility to report any concerns to the Welfare Officer.

1.10 The policy will be widely available at all touch points for the Club for those without access to the internet.

Statutory Agency referral policies and procedures take precedence over any Club or Governing



Body guidance. For further details go to:

<http://www.thefa.com/~media/files/thefaportal/governance-docs/safeguarding/raisingawareness/affiliated-footballs-safeguarding-policy-and-procedures.ashx>

2 RULES & REGULATIONS

2.1 OUFC is governed by the rules and regulations set out by The FA Safeguarding Children and Adults at Risk guidance and the Football League Safeguarding Children and Adults at Risk guidance.

2.2 OUFC is fully committed to ensuring that the best practice recommended by these bodies is employed throughout.

3 AIMS & KEY PRINCIPLES

3.1 The aims of this policy are:

- To safeguard all vulnerable adults who interact with OUFC activities;
- To demonstrate best practice in the area of safeguarding adults;
- To develop a positive and pro-active welfare programme to enable all persons to participate in an enjoyable and safe environment;
- To promote high ethical standards throughout OUFC activities.

3.2 The key principles underpinning this policy are:

- The welfare of all is, and must always be, the paramount consideration;
- All people have a right to be protected from abuse, exploitation and poor practice regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity;
- To acknowledge and commit to address the additional vulnerability of some participants and the extra barriers they may face e.g. those in care, those with mental health issues, physical disabilities and children living in substitute accommodation;
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately;
- To ensure that coaches, parents and other adults who come in contact with vulnerable adults and young people provide good role models of behaviour.

4 SAFEGUARDING DEPARTMENT

4.1 Welfare Officer

OUFC has a Welfare Officer who has total responsibility for the safeguarding of adults at risk in the Club.

Anyone with a concern about the welfare of a vulnerable adult should contact either the Welfare Officer for advice in the first instance – details can be found at the end of this policy.



5 HUMAN RESOURCES & DISCLOSURE

5.1 Recruitment

As part of the Club's recruitment and selection process, offers of work to positions which involve working with children/ vulnerable adults are subject to satisfactory DBS Criminal Record Checks (CRC) with barred list check, if necessary and appropriate references are obtained. All requests for CRC are applied for online with GB Group. All offers of work are subject to the outcome of the screening process and until such time as a satisfactory CRC certificate has been confirmed as clear, the member of staff will not be left unsupervised with children.

All employees, workers or volunteers in a position of trust are required to sign up to the Update Service and annual checks will be carried out by the Club.

Should an individual's CRC Disclosure reveal any convictions the Company will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out by the Lead Disclosure Officer, Safeguarding Manager and the appropriate Line Manager to assess the information contained within the disclosure certificate. On occasion the member of staff/volunteer may also be asked to attend an interview prior to a recruitment decision being made

All new employees, workers or volunteers working with children or young people at the Club will be required to complete a Self-Declaration on commencement of duties.

5.2 New Appointments who already have a Disclosure Certificate

If a new member of staff has had a disclosure check with their previous employer, e.g. another the original Disclosure certificate be shown to the Welfare Officer it must be dated within six months of the employee's start date at the Company and it must be for a similar role of that which the person has been appointed. The Company will apply immediately for a Company CRC and it is at the discretion of the Welfare Officer, whether the employee can start work before receipt of the Company CRC.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97875/leaflet-england-wales.pdf

5.3 Existing Staff

Priority is being given to those who come into contact with children and young people. All staff that have one to one contact with children and young people & vulnerable adults have received a CRC and for those undertaking regulated activity a barred list check.



5.4 Temporary Staff and External Consultants

The Company will ensure that all temporary staff and external consultants sign a Self-Declaration form and will not have unsupervised access to vulnerable and young persons during their time with the Company.

5.5 Good Practice

All employees, workers, consultants, agency staff and volunteers working with vulnerable adults should adhere to the following principles:

- Always work in an open environment. Avoid private or unobserved situations and encourage open communication with no secrets.
- Make the experience of the sporting activity fun and enjoyable, promote fairness, confront and deal with bullying.
- Treat all people equally, with respect and dignity.
- Always put the welfare of the adult first.
- Maintain a safe and appropriate distance with people and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the person's consent has been given.
- If groups have to be supervised in changing rooms always ensure coaches etc work in pairs.
- Request written consent if Club officials are required to transport vulnerable adult's people.
- Gain written consent for any significant travel arrangements e.g. overnight stays
- Coaches are qualified and a qualified first aider is in attendance.
- Be a good role model, this includes not smoking, drinking alcohol or use foul language in the company of young people/ vulnerable adults.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Keep a written record of any injury that occurs, along with details of any treatment given.
- All other good practice/common sense principles given the varying situations.

5.7 Health & Safety

The Company's Welfare Officer gives guidance to those whose roles involve working with venerable adults and young persons. Where a vulnerable adult or young person is involved, a risk assessment must take account of their particular vulnerabilities which will include the safeguarding of adults at risk.

The risk assessment should set out what arrangements are in place for their care and supervision.



5.8 Data Protection

The Data Protection policy adopted by the Company is in line with current legislation. All full time and casual staff sign OUFC confidentiality and information sharing agreement.

6 OXFORD UNITED FC PROCEDURES

6.1 Parental/Carer Consent

OUFC will make every effort to obtain parental/carers consent for all activities using a signed parental or carer consent form. OUFC will do everything it can to safeguard everyone in its care, but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental/carers consent for activities is not always possible.

6.2 Use of photography & film image

OUFC uses guidance from The FA and the CPSU. All images are taken by Club officials who have been briefed by a Club Safeguarding Officer or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed. Before taking images of vulnerable adults or young people parental consent is sought in writing, this could be at the start of the season or prior to the event. Parents, carers, guardians are responsible for informing the Club of any change of circumstances within the season which may affect consent. The Club will inform parents, carers, guardians of how the image will be used and they will not allow an image to be used for something other than that for which it was initially agreed.

- All adults or young people featured in Club publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific person.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated Club photographers will, where applicable, undertake a CRC/DBS check and will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies from the Football League. Club identification will be worn at all times.
- People who are subject of a court order will not have their images published in any Club document.
- No images of people featured in Club publications will be accompanied by personal details such as their home address.
- Recordings of children/ vulnerable adults for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- Mobile cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to the Safeguarding Manager.
- The Club does not put young player profiles with images and personal information on its website.



- The Club does not condone inappropriate unauthorised photographs to be taken with players, Club staff or at Club facilities and will actively take measures to prevent this; signage, security and stewarding.

6.3 Ratio of Coaches

Oxford United Football Club adopts best practice regulations laid down by the FA in relation to the supervision of Adults to all. Procedures are in place to fully risk assess the types of activity and participant ability to ensure appropriate ratio of staff/coaches to participants.

6.4 Coaching in Schools/Community

OUFC is committed to using the power of football to encourage vulnerable adults and young people to enjoy the benefits of sport and healthy living and will frequently run coaching sessions within local schools and education centres.

It is the responsibility of the school to obtain parental consent and carry out the relevant risk assessments before an activity takes place and OUFC will carry Public Liability Insurance. For After School clubs it will be the responsibility of OUFC to gain parental/carer consent and carry out the risk assessments of the site. The above information is set out in a service level agreement with the school which is signed prior to the event taking place.

6.5 CRC

In accordance with the procedures detailed above, all staff undergo a DBS CRC check every 3 years.

6.6 Activities for Disabled Persons

OUFC carries out all activities for disabled persons under the guidelines of the Disability Discrimination Act.

6.7 Restraint Procedure

OUFC only carry out physical intervention on a match day should it be acquired. It would always be carried out by fully trained personnel who would hold a SIA qualification as well as the Physical Intervention qualification. If in doubt of age a Safeguarding Officer would be called along with the police. Police are always present on site for every home fixture.

7 GUIDELINES IN THE EVENT OF CONCERN

7.1 Highlighting Concern

Although OUFC is committed to doing the utmost to safeguard adults from harm, there may be an occasion when concern is raised over the treatment of a vulnerable adult. 'Abuse and neglect' are generic terms encompassing all ill treatment of vulnerable adults as well as cases where the



standard of care does not adequately support the person's health or development. Vulnerable adults may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the vulnerable adult.

7.2 Recognition – Signs of Abuse

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the Welfare Officer immediately.

7.3 Physical Abuse

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

7.4 Sexual Abuse

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

7.5 Neglect

The persistent failure to meet a vulnerable adults or young person's basic physical and/or psychological needs, are likely to result in the serious impairment of the child's or young person health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

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

It may also include neglect of, or unresponsiveness to, a vulnerable adults or young person's basic emotional needs.



7.6 Emotional Abuse

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

7.7 Bullying

The Club define bullying as the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power.

The Club also recognises the concept of hazing. Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Hazing is not tolerated by the Club.

For more detailed information on the main forms of abuse refer to:

<http://www.thefa.com/football-rules-governance/safeguarding/introduction-tosafeguarding>

The information above has been taken from this source.

<http://www.thefa.com/football-rules-governance/safeguarding/dealing-with-concerns>

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447595/KCSIE_July_2015.pdf



8 RESPONDING TO A REPORT OR SUSPICION

Where possible the Safeguarding Manager should be contacted as early as possible, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Do:

- If the vulnerable adults is hurt or ill - seek medical attention if necessary – call the Police 999 and ask their advice if you are unsure - or Local Authority Designated Officer – if the child is immediately at risk of significant harm
- treat any allegations extremely seriously and act at all times towards the child to show you believe what they are saying - **LISTEN**
- tell the person they are right to tell you
- reassure them that they are not to blame
- be honest about your own position, who you have to tell and why
- tell the vulnerable adult what you are doing and when, and keep them up to date with what is happening
- take further action – you may be the only person in a position to prevent future abuse
- **3R's Respond, Record, Refer** (Report on to the appropriate person)
- write down everything said and what was done as soon as you can - Use the vulnerable adults words – not your own opinion or what you think they said
- inform parents/carers unless there is suspicion of their involvement

Don't:

- make promises you cannot keep
- interrogate the vulnerable adults – it is not your job to carry out an investigation/interview – this will be up to the police and local authority professional staff, who have experience and are trained specifically to sensitively manage the disclosure – ask the most basic questions and then let the child talk, you LISTEN and ensure that you do not jeopardise any potential criminal investigations
- cast doubt on what the vulnerable adults has told you, don't interrupt or change the subject
- say anything that makes the child feel responsible for the abuse
- promise to keep secrets or keep the information confidential

INACTION IS NOT AN OPTION – Safeguarding is Everyone's responsibility

Make sure you tell the Safeguarding Manager immediately, they will know how to follow this up and where to go for further advice.

Contact Details:

Welfare Officer:

Matt Jarvis 07837842231 mjarvis@oufc.co.uk

Jonny Edmunds 07769707867 jedmunds@oufc.co.uk

Dan Harris dharris@oufc.co.uk

Police: 999(in an emergency)



Oxfordshire FA Designated Officer: Nigel Saverton Education, Safeguarding & Referee Support Manager

Oxfordshire Football Association, Unit 4, Witan Park, Station Lane, Witney, Oxon, OX28 4FH
01993 894404 nigel.saverton@OxfordshireFA.com www.OxfordshireFA.com

9 RECORDING ALLEGATIONS OR SUSPICIONS

The Welfare Officer will ask for a written factual statement from the person making the report. If the report involves an allegation about another member of staff, that person will also be asked to write a brief report. Any statement made by the child or young person should be reported *in their own words*. These reports should be confined to facts and should not include any opinion, interpretation or judgement.

OUFC will ensure that any person concerned is immediately removed from any possible risk of harm. Investigations into possible abuse will require careful management. The Welfare Officer should seek the advice of the Local Authority Safeguarding Adults teams, the Police, or in cases of low level poor practice The Football Association Safeguarding Children & Vulnerable Adults Case Management Team before setting up an internal inquiry and take their advice on informing the child or young person's parents. In any case of suspected abuse, as soon as the Local Authority Designated Officer has been informed, OUFC must provide a report to the Football League's Head of Safeguarding and the FA Head of Safeguarding Children & Vulnerable Adults – by the referral form which is held with the Club Welfare Officer.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at OUFC is that no guarantee of confidentiality can be given to a vulnerable adults or young person (although this does not necessarily mean that the parents of the young person have to be told).

You cannot promise to keep their disclosure a secret or that you will not have to speak to someone else about the issue – reassure them that it will be on a 'need to know' basis and that their dignity and privacy will be respected at all times.

A vulnerable adults or young person should never be pressured to give information or show physical marks unless they do so willingly. **If they chose to show markings, two members of staff should be present.**

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring a safeguarding children issue to the Welfare Officer. The key issue is that the welfare of the child is protected.

- **Ensure that the safety and welfare of all participants is your first priority** and ensure that any planning, preparation, delivery or review reflects this duty and all actions are in the best interests of those in your care.
- **Treat vulnerable adults and young people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual



orientation or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.

- **Listen carefully to vulnerable adults and young people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort as well as performance.**
- **Only use physical contact with participants where absolutely necessary.** If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the child what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.
- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a players welfare.
- **Not appear to favour one person or show interest in one person more than another.**
- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent, and is considered a breach of this Policy.

Report any concerns you have over a person in your care or the actions of a member of the workforce. If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know). This may be your line manager or designated Welfare Officer.

10 Whistle-Blowing:



Volunteers, coaches, match officials, parents and other juniors may be the first to have concerns about a vulnerable adults safety and welfare. However, they may be reluctant to express their concerns as speaking up may be difficult. They may also fear harassment or victimisation. In these circumstances it may seem easier to ignore the concern rather than report what may just be a suspicion of poor practice. When individuals feel unable to follow the normal reporting procedures or have already followed the procedure and consider that the issues have not been adequately addressed, they are encouraged to contact the Welfare Officer. This process, known as "whistle-blowing", enables individuals to share their concerns, in confidence with the Safeguarding Team without fear of victimisation, subsequent discrimination or disadvantage. All concerns will be taken seriously and managed accordingly within the OUFC Safeguarding Policy, Procedures and Practices. OUFC will fully support and protect those, who, in good faith, report their concerns that someone has demonstrated poor practice or has abused, or may be, abusing a child. OUFC will do its best to protect the identity of the whistle-blower when they raise a concern and do not want their name to be disclosed. However, depending on the seriousness of the allegation, particularly when it may be necessary to seek advice or inform the Police or Social Services, it may not be possible to keep the source of the information hidden. The individual will be given prior notice of this and a chance to discuss the consequences. The OUFC will ensure that support is available both during and following an incident or allegation. In cases where you are required to take immediate steps regarding a serious incident of abuse, or you do not feel able to disclose your concerns to Welfare Officer, an individual must contact the Police, Social Services or the NSPCC.

11 Contact Details for Clubs Welfare Officer:

DSO: Matthew Jarvis (Academy/Club)
07837842231
mjarvis@oufc.co.uk

DSO: Chris Lowes (Community)
07736843093
Clowes@oufc.co.uk

Welfare Officers:
Jonny Edmunds
07769707867
jedmunds@oufc.co.uk

Dan Harris
07801503330
dharris@oufc.co.uk



12 External Contact Details

Oxfordshire FA Designated Officer: Nigel Saverton Education, Safeguarding & Referee Support Manager

Oxfordshire Football Association, Unit 4, Witan Park, Station Lane, Witney, Oxon, OX28 4FH
01993 894404 nigel.saverton@OxfordshireFA.com www.OxfordshireFA.com

The Police 101 or (in an emergency) - 999

The Football Association/NSPCC
Safeguarding Children & Vulnerable Adults Helpline
Tel: 0808 800 5000
Text phone for Deaf Users
Tel: 0800 056 0566

In addition to the existing policy, during the period of Return to Play from COVID-19 the Football Club and Academy have made a number of additions to our welfare, operational and safeguarding procedures. These include, but are not limited too:

- **Logistical process for social distancing at the Training Ground.**
- **Small group training in Phase 1 and Phase 2**
- **Weekly welfare and safeguarding meetings with specific COVID-19 allocated staff**
- **Additional risk assessment planning for all Academy operations**
- **Regular contact between Academy COVID-19 Officer (DH) and Club COVID-19 Officer (NMc)**