



Crawley Town Community Foundation

Safeguarding Adults at Risk

January 2025

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2 1 Policy Aims and Objectives

2.1 Policy Statement

Crawley Town Community Foundation is committed to the delivery of safe activities through its own programmes and when working with partner organisations. We will ensure the implementation of robust and considered safeguarding arrangements, adopt a proactive approach to risk minimisation as well as applying an appropriate and person-centred response in the event of a safeguarding concern or incident occurring on a programme.

We are committed to working with local communities to develop impactful programmes which develop the skills of adults and creates an environment in which they can realise their full potential. In achieving this, Crawley Town Community Foundation recognises its responsibility in promoting the health, safety and wellbeing of all adults accessing programmes and in implementing robust safeguarding policies & procedures and continually reviewing and improving ways of working to ensure the best possible outcomes for adults at risk in their reach.

Crawley Town Community Foundation is committed to the ongoing support of the survivors of historical abuse in football and to the continued investment into robust safeguarding policies and procedures, to learn lessons from the past and prevent any further such events in the future.

2.2 Purpose of Policy

The Safeguarding Adults at Risk Policy serves to ensure that all adults accessing a programme or activity hosted by Crawley Town Community Foundation or with partner organisations can do so safely and with the appropriate levels of support. The policy seeks to:

- Clearly demonstrate Crawley Town Community Foundation's commitment to safeguarding adults at risk and outline the measures Crawley Town Community Foundation will take to prevent safeguarding incidents occurring as a result of their practices.
- Outline the measures Crawley Town Community Foundation will take in response to a safeguarding concern or incident to ensure that the adult at risk is supported appropriately and the best possible outcome achieved.
- Ensure appropriate learning is taken from any safeguarding incidents in order to make future improvements.
- Clearly outline the safeguarding responsibilities of the workforce, ensuring they are confident in the actions to take in the event of a safeguarding incident or concern and understand what support is available to them.
- Identify key safeguarding contacts within the Crawley Town Community Foundation and at the Local Authority
- Clearly outline the escalation process in the event of a safeguarding incident or concern
- Ensure that the adult at risk is placed at the centre of a safeguarding incident or concern and that they are fully involved in any decisions about their wellbeing or support.

3 Scope of Policy

3.1 Crawley Town Community Foundation Staff and Volunteers

This policy is for the use of the Foundation's staff, including any volunteer employees operating at all levels of responsibility within the organisation. The policy is accessible to all, and the team receive on-going training on their safeguarding responsibilities in relation to their job role.

3.2 Key Safeguarding Contacts

Darren Ford	Designated Safeguarding Lead	01292 410000 darrenford@crawleytownfc.com
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4 Legal, Statutory and Regulatory requirements

This policy is underpinned by current government legislation and guidance. Crawley Town Community Foundation will regularly review and amend this policy to reflect any changes to legislation and guidance at a minimum of once yearly and more often as required.

4.1 Key Legislation

The Crawley Town Community Foundation Safeguarding Adults at Risk Policy underpins key legislation including:

- The Care Act 2014 and the Care and Support statutory guidance
- Safeguarding Vulnerable Groups Act 2006
- National Safeguarding Adults policy and procedures
- Mental Capacity Act 2005
- The Human Rights Act 1998
- Data Protection Act 2018
- Domestic Violence Act 2021
- Modern Slavery Act 2015
- Equality Act 2010
- No Secrets: Guidance on developing and implementing multi agency policies and procedures to protect vulnerable adults from abuse

Due to the focus of many of the programmes and activities delivered by the Foundation being based around education and health, Crawley Town Community Foundation works in conjunction with guidance from the Department for Education (DfE) and the Department of Health and Social Care. Key documents include:

- Keeping Children Safe in Education 2024
- Special Educational Needs and Disabilities Code of Practice: 0 to 25 years

5 Introduction / Background

This policy upholds the general principles of safeguarding **as outlined in the Crawley Town Community Foundation Children & Young Peoples Safeguarding Policy & Procedures**. It is however recognised that adults at risk may be vulnerable to harm and exploitation that differs from that faced by young people. Crawley Town Community Foundation and the wider network of partner organisations are committed to implementing an effective and appropriate strategy which is underpinned by legislative frameworks and guidance and promotes multi-agency working with authorities and services tailored to meeting the needs of adults at risk.

Crawley Town Community Foundation recognises that adults at risk may be at increased risk of abuse or harm due to several factors, including disability or impairment, reliance on others and mental capacity. A contextual approach to safeguarding is encouraged across the network, with the Foundation and partner organisations recognising that adults at risk may be vulnerable to abuse, harm and exploitation from their relationships and interactions within the wider community and that their safeguarding responsibilities are not limited solely to when a concern arises on a programme or activity.

The Crawley Town Community Foundation believes that adults at risk should have access to the same level of protection as young people when accessing programmes delivered by the Foundation and partner organisations and where voicing a concern or making a disclosure or allegation, must be taken seriously and to be treated with the respect they deserve.

6 Safeguarding Adults at Risk

6.1 Defining Safeguarding Adults at Risk

For the purpose of this policy, adults at risk as defined as those persons aged over 18 years who are considered as individuals who are or may be in need of community care services by reason of impairment or disability, age or illness and who are, or may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

The Care Act (Dept. of Health, 2014) defines safeguarding as protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

The majority of adults accessing our programmes and activities will not meet this definition, and Crawley Town Community Foundation recognises our responsibility to promote the wellbeing and safety of all programme participants and are committed to fostering a supportive culture, proactively seeking to support our participants on a person-centred basis and responding appropriately to any challenges they may face. As the Foundation targets some of the biggest challenges we face as a society, we have a duty to recognise how these issues can place our participants at risk of harm and strengthen our practices around safeguarding.

Examples of issues which may negatively affect some of the adults accessing our programmes and activities, placing them at risk of harm may include, but are not limited to; poor mental health, illness/poor health/long term medical conditions, impairments or disabilities (including

physical/learning/sensory issues), low income/financial difficulties, social isolation, limited education, limited access to services (including health, education etc.), low self-esteem, age, socio-economic deprivation.

6.2 Considerations for Safeguarding Adults at Risk

The Care Act 2014 sets out the legal framework to Local Authorities and other statutory agencies for how adults at risk should be protected.

The act recognises that local authorities cannot safeguard individuals on their own - this can only be achieved through multi-agency collaboration and the awareness of the wider public.

The act identifies **six key principles** which should underpin adult safeguarding work:

- **Empowerment** - Personalisation and the presumption of person-led decisions and informed consent
- **Prevention** - It is better to take action before harm occurs
- **Proportionality** - Proportionate and the least intrusive response appropriate to the risk presented
- **Protection** - Support and representation for those in greatest need
- **Partnership** - Providing local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability** - Accountability and transparency in delivering safeguarding

6.3 Mental Capacity and Safeguarding Adults at Risk

The requirement to apply the Mental Capacity Act (MCA) 2005 is a key consideration when addressing concerns about an adult at risk. Where an adult at risk has mental capacity, they must, wherever possible, be consulted with and have their wishes considered during the decision-making process when referring any safeguarding concerns to statutory agencies including adult social care departments.

The mental capacity of an individual is assessed by the local authority and other individual parties and individuals directly involved in their care and support. This is not something that is established by Crawley Town Community Foundation or any partner organisation.

Where a participant's mental capacity may impact upon their engagement in a programme delivered by the Foundation, this must be identified as part of a support needs assessment carried and the appropriate measures taken under the guidance of guardians and professionals directly involved in their care.

5.5 Support Assessments & Reasonable Adjustments

Where an adult at risk is accessing any programme, activity or event held within the network, they are to undergo a person-centred assessment of needs for any required adjustments to activities, the environment or staffing to be identified and actioned. In certain cases, writing Individual Support Plans (ISPs), undertaking personal risk assessments and providing tailored support from a team of trained and competent staff and volunteers will be required. Crawley Town Community Foundation

provides ongoing guidance to the network and ensures key staff have access to training and workshops as part of a wider training strategy, however, responsibility remains with CCOs and partner organisations.

6.4 Safeguarding Adults at Risk during Crawley Town Community Foundation Programmes (held by the Foundation or partner organisations)

Adults at risk attending projects, activities and programmes delivered by our partners and network of CCOs will be safeguarded under the policies and procedures of those organisations.

The Crawley Town Community Foundation team are likely to have incidental contact with adults at risk, usually when visiting other activities. As such, if a member of the team has a concern about an adult they encounter, they are unlikely to know whether they:

- are already known to services as an 'adult at risk'
- has or lacks mental capacity
- considers themselves to be 'at risk' or to have any vulnerabilities

In any case, when there is a concern about an activity participant, the team member must report this to the partner organisation's DSL and to the Crawley Town Community Foundation DSL immediately.

If there is a concern for the participant's immediate safety, the Crawley Town Community Foundation team is prepared to notify emergency services (as appropriate) and support CCO/Partner staff with managing the environment until the concern is resolved.

See Appendix 2 for comprehensive Definitions, Sign and Indicators of Potential Abuse with regards to adults at risk.

6.5 Responding to a Safeguarding Concern at Crawley Town Community Foundation Events

Where there is a concern about an adult at risk attending an activity hosted by Crawley Town Community Foundation, or a disclosure has been made, the team will fulfil their duty to support them appropriately and act by notifying the DSL, who will undertake an assessment of the best course of action to take, based on the information provided. Where the concern meets the threshold for referral to the Local Authority, this will be made by the DSL.

It is the role of adult social care, as part of the Local Authority's Local Safeguarding Adults Board (LSAB), and/or the police to investigate allegations or concerns. The Crawley Town Community Foundation team has a duty to work in partnership with LSABs and follow their procedures.

If a staff member or volunteer has a concern they must:

1. Respond

- Take appropriate and immediate action if the individual requires urgent medical attention or protection.

- Collect information about the situation and make a thorough and accurate record. Records should include the date and time of the incident or disclosure, parties who were involved, what was said or done and by whom and any further actions taken.
- Seek consent from the Individual to act and to report the concern, considering whether they may lack capacity to make decisions about their own and other people's safety and wellbeing. If it is decided to act against their wishes or without their consent, a record of the decision and the reasons for this must be made.
- Where it has been decided to act against the wishes of the individual, be transparent and ensure they understand that the concern will need to be shared with others.
- Where appropriate, signpost the individual to relevant support services.

2. Report

- Notify the DSL as priority and before the end of the activity.
- Where the DSL is unavailable, notify the line manager, trained to Level 3, who will offer support until the DSL is available.

3. Record

- Report a concern, using My Concern and submit the appropriate reporting form to ensure a record of the concern is maintained. Written evidence should be factual. Opinions can be included if it is clearly documented that it is an opinion.
- Ensure all records are kept securely and confidentially, in line with GDPR.

4. Refer

The DSL will consider the appropriate action to take, taking the following into account:

- The individual's wishes and preferred outcome
- The safety or wellbeing of young people or other adults with care and support needs
- Whether there is a person in a position of trust involved
- Whether it appears a crime has been committed
- Whether the concern meets the threshold for the intervention of Local Authorities

The DSL will use their expertise and experience to decide upon the relevant action to take to achieve the best possible outcome for the adult at risk. Actions decided upon can range from signposting the individual to appropriate support services in the case of more minor events to making a referral to their LSAB in the case of more significant concerns.

6.6 Responding to a Safeguarding Concern at the Foundation and its Partner Organisations

The Foundation and its partner organisations have their own safeguarding arrangements in place which underpin the principles of this policy.

When managing a concern, DSLs at CCOs and partner organisations must follow their own internal policies and procedures, ensuring that they and their staff teams Respond, Report, Record & Refer appropriately. Where CCOs or partner organisations require additional support, guidance, or advice

to ensure a concern is managed appropriately, the Crawley Town Community Foundation Designated Safeguarding Lead is on hand to provide oversight.

Clear escalation processes are outlined in **Section 15 - Appendices**, to ensure appropriate management of concerns involving staff members or volunteers and ensure they are shared with relevant bodies. It is imperative that the Foundation and its partner organisations understand the contractual requirements in relation to the recording and reporting of safeguarding incidents for each individual contract and comply with these requirements fully. Requirements are set out in contracts and/or Service Level Agreements (SLAs) and should be clearly established during the development of the programme to ensure a robust process is in place for programme delivery.

When escalating a safeguarding concern or disclosure to the Crawley Town Community Foundation Designated Safeguarding Lead, staff and volunteers will be asked to provide the following information:

- **Facts** – A factual account of what has happened without opinion/hearsay. What has been witnessed or what exactly has been said
- **Actions** – Details of steps the staff team have already taken to support the adult at risk.
- **Cooperation** – Follow direction and guidance of the Designated Safeguarding Lead
- **Records** – A detailed incident log on the relevant IT system (My Concern etc.)

Ongoing updates of the situation will be requested so an appropriate response can be made to any developing concerns.

When handling a concern or disclosure, the Designated Safeguarding Lead will keep accurate records of all subsequent actions taken, as well as monitor the feedback from statutory agencies on any action taken by themselves. In the event of an unsatisfactory response or action from statutory agencies the team will formally escalate their concerns within the local authority.

7 Safer Recruitment & Workforce Management

7.1 Safer Recruitment & Safer Culture

Crawley Town Community Foundation has established robust safer recruitment, safer culture and workforce management policies and procedures, which are outlined in the:

- Crawley Town Community Foundation Safeguarding Children and Young People Policy & Procedures
- Crawley Town Community Foundation Safer Recruitment & Managing Allegations Policy
- Crawley Town Community Foundation Recruitment & Selection Policy
- Crawley Town Community Foundation Employee Handbook
- Crawley Town Community Foundation Recruitment of Ex-Offenders Policy

The principles outlined within these policies are mirrored within CCO safer recruitment policies.

7.2 Allegations of abuse or poor practice against Crawley Town Community Foundation Staff and Volunteers

Allegations of abuse and concerns or complaints about practice raised against a member of Crawley Town Community Foundation staff or a volunteer will always be taken seriously and managed in

accordance with the local policies of the relevant authorities involved, including where a non-recent, historical allegation is raised.

Crawley Town Community Foundation expects all our staff and volunteers to share a commitment to safeguarding adults at risk and vulnerable groups, in accordance with this policy during their employment or volunteer activities.

In addition to this policy, Crawley Town Community Foundation outlines staff and volunteers' duties, behaviours and responsibilities in respect of safeguarding within:

- The Crawley Town Community Foundation Employee Handbook

And more specifically within:

- Safer recruitment messages including Job Descriptions, Person Specifications and Employment Contracts

Crawley Town Community Foundation policies, procedures and best practice guidance, including those established by our partner organisations within the football/sport and youth sector, should identify how staff and volunteers should be mindful that they hold a relationship of trust and one of a role model.

Staff and volunteers must adhere to expected behaviours and conduct. This approach seeks to create a culture whereby concerns regarding the behaviour or conduct of others can be recognised and reported.

7.3 Low-Level Concerns

Crawley Town Community Foundation applies the same policies and procedures around low-level concerns for adults and children alike. Full details can be found in the Crawley Town Community Foundation Safeguarding Children & Young People Policy.

7.4 Referral to Statutory Agencies (Including the FA)

The Safeguarding & Incident Manager will follow the Crawley Town Community Foundation procedure for reporting allegations against staff and volunteers, including referral to the relevant LSAB and other statutory agencies where appropriate.

All referrals must take place within one working day (24 hours) of the allegation or concern being raised.

West Sussex Safeguarding Adults Board: 01243 642121
or between 5pm – 9am: Adult Social Care out of hours manager on 03302 227007

All low-level concerns and allegations related to a member of staff or volunteer are to be reported to the FA Case Management Team.

8 Confidentiality

8.1 Confidentiality Statement

Crawley Town Community Foundation will operate on the premise that all information imparted to a member of staff or volunteer will be treated in confidence. Confidentiality is a key issue for adults at risk and other vulnerable groups. They may trust a member of staff or volunteer with issues of a personal nature and wherever possible their confidences should be respected.

8.2 Guidelines

Staff and volunteers must become familiar with the following Crawley Town Community Foundation Confidentiality Guidelines and that they are mindful of professional boundaries.

- Staff must not make promises on confidentiality they may be unable to keep.
- Staff should always make an adult at risk fully aware of any situation where confidentiality must not be maintained as in a **case of a crime being committed or appears to have been committed**.
- Staff or volunteers may be in a situation whereby they are dealing with information that is difficult for the member of staff to process without further advice/support. In this case the adult at risk should be told that the situation will be discussed with another colleague with a speciality in that area, but that confidentiality will be maintained if possible.

8.3 Breaking Confidentiality

It is important to seek the consent of the adult before taking action. An adult has the right to refuse support. Any decision to break confidentiality should always be in the best interest of the individual and preceded by informing the adult at risk of what is about to happen and the reason for that decision. There will be no breach of confidence if the person to whom a duty of confidence is owed consents to the disclosure.

It is therefore essential that members of staff understand the balance between confidentiality and the sharing of information. For that reason, they must not promise absolute confidentiality to an adult at risk or other vulnerable group as the safety and wellbeing of that person must be the paramount consideration.

Under GDPR and The Data Protection Act 2018, it is clearly stated that data protection is not a barrier to the sharing of information in relation to safeguarding. Schedule 8 of The Data Protection Act 2018 states the conditions for sensitive processing under Part 3 (Rights of the data subject) as:

Safeguarding of children and of individuals at risk

This condition is met if—

(a) the processing is necessary for the purposes of—

- (i) protecting an individual from neglect or physical, mental, or emotional harm, or
- (ii) protecting the physical, mental, or emotional well-being of an individual.

8.4 Sharing concerns with parent/guardians or carers appropriately

Where an adult at risk receives ongoing support or care from a parent, guardian or carer, appropriately sharing information is important in ensuring a robust and considered response to a safeguarding concern. When working with adults at risk, it is important to respect their opinions and wishes, while also taking into consideration any support needs.

When considering speaking to a parent, guardian or carer about a safeguarding concern or disclosure, it is important to take the following into account:

- If discussing the concern will negatively impact upon the welfare or safety of the individual. i.e. where the parent, guardian or carer is the alleged perpetrator of abuse or harm.
- If the individual consents to you discussing the concern with their parent, guardian or carer.

The individual's welfare is paramount and central to any safeguarding actions taken. There is always a commitment to work in partnership with parents, guardians or carers where there are concerns about the individual with care and support needs. Therefore, in most situations, it will be important to talk to parents, guardians or carers to help clarify any initial concerns.

Concerns will not be shared with parents, guardians or carers if it is alleged that they are responsible for the abuse or harm, or there is other information to indicate this will put the individual at increased risk. In such situations, this is to be reported to the Designated Safeguarding Lead, as soon as possible and recorded.

All decisions taken regarding the sharing of information will be made in conjunction with the Designated Safeguarding Lead, who are responsible for recording the decisions made along with the supporting rationale.

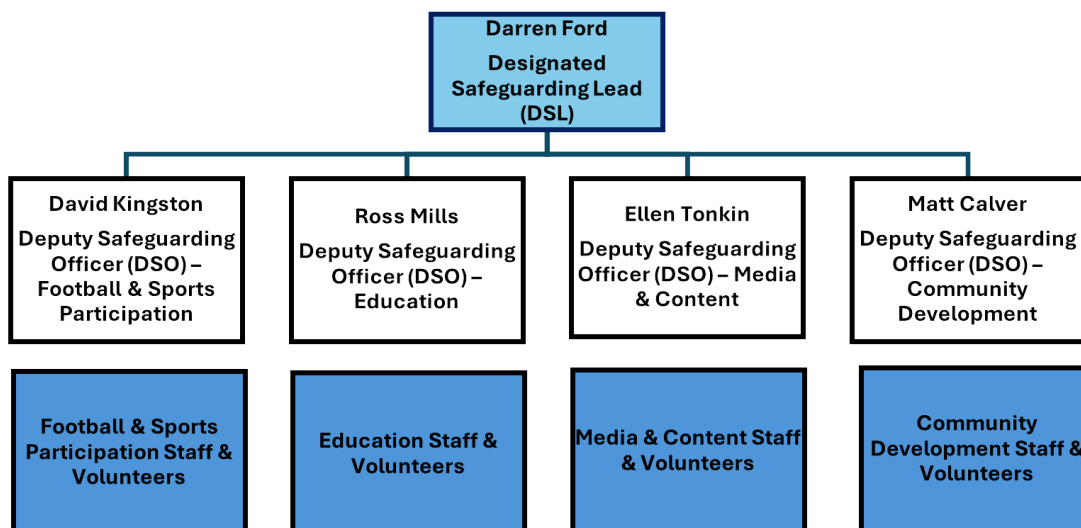
8.5 Confidentiality and Allegations against Staff and Volunteers

Consideration should be given to confidentiality where allegations are made against staff and volunteers, and that information should be shared strictly with those who need to know in order to keep adults at risk and other vulnerable groups safe and protect those staff and volunteers where such allegations prove unfounded. Key staff who must be made aware in line with the procedure include:

- Those who form part of any investigation.
- Identified Senior Manager e.g. Head of Foundation and where appropriate, Head of Department
- The Crawley Town Community Foundation Designated Safeguarding Lead
- The Foundation's Safeguarding Trustee
- The Foundation's Chair of Trustees
- The Foundation's HR Lead

9 Key Responsibilities

Safeguarding is a key part of every role working within the Crawley Town Community Foundation.



10 Performance Management and Reporting

The Foundation and its partner organisations are subject to governance & quality monitoring to assess their capability to deliver safe programmes and meet safeguarding requirements.

10.1 The Foundation

The Crawley Town Community Foundation is measured against the following:

- Capability Code of Practice (CCOP) – The CCOP outlines recommendations for effective governance and management and is used as a tool to support the Foundation to continually develop their practices.
- Crawley Town Community Foundation risk assessments.
- Project specific risk assessments - Individual projects will have their own requirements in regard to evidencing capability to safely deliver programmes.

10.2 Other Partner Organisations

Where partner organisations are not part of the Crawley Town Community Foundation, they are not measured against the CCOP. They are, however, still measured against due diligence checks and contractual obligations in relation to safeguarding.

11 Risks associated with Policy.

Risks mitigated by this policy include (but are not limited to):

- Putting adults and staff/volunteers at risk through an inexperienced or unprepared workforce supervising adults at risk.
- Putting adults and staff/volunteers at risk through employment of a workforce who have not satisfied safer recruitment requirements.

- Negatively impacting the experience of adults accessing activities through a lack of consideration of their needs and failing to make reasonable adjustments or implement support measures as required.
- A lack of safeguarding provision ensuring that staff are equipped and supported to recognise, manage, and escalate any concerns that may arise.
- Failing to share information regarding an adult with relevant parties which may be required to ensure they are protected from harm, abuse or exploitation.
- Failing to learn lessons from concerns that may arise and make continual improvements to processes.
- Failing to adequately safeguard personal and sensitive data in line with GDPR.
- Failing to comply with government legislation in relation to safeguarding and outcomes of governing bodies & contract holders.
- Ultimately damaging the reputation of the organisation through poor practice

12 Privacy Implications

Crawley Town Community Foundation recognises its responsibility in protecting the personal information or special category data collected for the purposes of safeguarding adults at risk. A robust Data Protection Policy is operated and is underpinned by the General Data Protection Regulations 2018 (GDPR) and Data Protection Act 2018.

For the purposes of protecting an adult at risk from harm, abuse or exploitation, there may be times where the Crawley Town Community Foundation must share information with specialist agencies, local authorities and/or others involved in their care or support. In such cases, Crawley Town Community Foundation endeavours to clearly communicate who this information will be shared with and for what purpose, seeking the consent and input of the adult at risk where this is possible. Any information shared with other parties will be done so in line with GDPR to ensure that this is done so safely and without compromise.

All information collected for the purposes of safeguarding is recorded and stored securely and is kept for no longer than required. Crawley Town Community Foundation will seek to appropriately communicate what information is being held on an adult at risk, for what purpose and for how long.

13 Equality, Diversity, and Inclusion

This policy underpins equality, diversity, and inclusion through ensuring robust procedures are in place for adults at risk to safely access activities undertaken by Crawley Town Community Foundation and its partner organisations. Consideration is taken of any vulnerabilities that participants may have in order to make reasonable adjustments and remove barriers to full engagement. The policy aims to support a culture where all participants can flourish and realise their full potential and for staff and volunteers to fully understand their responsibilities to supporting the welfare of participants. The policy aims to support equality, diversity and inclusion in the following ways:

- Ensuring measures are in place to appropriately identify vulnerabilities and/or care and support needs of adults accessing activities, programmes, or events in order for reasonable adjustments to be made.
- Supporting the recruitment of staff to ensure adults at risk are supported by competent and appropriate staff & volunteers.

- Ensuring staff and volunteers have appropriate training and supervision to appropriately carry out their duties in relation to safeguarding.
- Fostering an environment where adults at risk can feel safe, flourish and realise their full potential.

14 Policy review and improvement

This policy will be reviewed by the Crawley Town Community Foundation Designated Safeguarding Lead and Safeguarding Trustee once per year as a minimum standard. Where significant amends are made to government legislation or guidance or where amends are required as part of ongoing learning and continual development of the safeguarding provision, review and amendment of the policy will be carried out as and when required. A clear history of the policy will be kept, with a record of amendments made. The policy will always be reviewed and agreed by the Foundations Board of Trustees before circulation throughout the organisation.

15 Associated procedures, templates or pro formas etc.

This policy should be read in conjunction with the following policies and practice guidance as appropriate to specific programmes or areas of work. Please note that this list is not exhaustive, and Crawley Town Community Foundation is committed to circulate relevant guidance documents to its partner organisations as they are produced and as amendments are made.

The FA Policies & Guidance	The FA Football Safeguarding Framework and accompanying policies, procedures & guidance can be found on their website. www.thefa.com/football-rules-governance/safeguarding
EFL Policies & Guidance	<ul style="list-style-type: none"> ▪ Safeguarding Children Policy ▪ Complaints Policy ▪ EFL Safeguarding Strategy
Crawley Town Community Foundation Policies, Guidance & Templates	<ul style="list-style-type: none"> ▪ Safeguarding Children & Young People Policy & Procedures ▪ Crawley Town Community Foundation Safeguarding Children, Young People & Adults at Risk Easy Read ▪ Capability Code of Practice Season 2022-25 ▪ Complaints Policy ▪ Whistleblowing Policy ▪ Health and Safety Policy ▪ Recruitment & Selection Policy ▪ Recruitment of Ex-Offenders Policy ▪ Data Protection Policy ▪ Staff & Volunteer Code of Conduct ▪ Safeguarding Supervision Policy & Agreement
EFL & Crawley Town Community Foundation joint guidance	<ul style="list-style-type: none"> ▪ www.efl.com/governance/safeguarding

16 Appendices

16.1 Appendix 1: Useful Contacts

Crawley Town Community Foundation Designated Safeguarding Lead	01293 410000 darrenford@crawleytownfc.com
Darren Ford	
EFL in the Community Safeguarding & Incident Manager	01772 376797 tlawson@efl.com
Tara Lawson	
The Charity Commission	www.charitycommission.gov.uk
West Sussex Adults Social Care Services	01243 642121
The FA/NSPCC	0808 500 5000 24-hour helpline
The FA Safeguarding Case Management Team	0800 169 1863 #6300
Anti-Terrorism Hotline	0800 789 321
NSPCC Female Genital Mutilation (FGM) Help line	0800 028 3550
Forced Marriage Unit (FMU)	0800 050 2020.
Stonewall (LGBTQ+ support & guidance)	0800 050 2020.
The Money Advice Service	www.moneyadviceservice.org.uk
Citizens Advice	www.citizensadvice.org.uk
Hub of Hope Find support services in your local area	www.hubofhope.co.uk

16.2 Appendix 2: Types of abuse and recognised safeguarding concerns specific to adults at risk

Physical abuse

Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing.
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate, disproportionate or unlawful use of restraint
- Making someone purposefully physically uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement

- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food.
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)
- Restricting someone from moving around their physical environment

Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened.
- Injuries are inconsistent with the person's lifestyle.
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps.
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of

Domestic violence or abuse

Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person.

- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse

- Low self-esteem
- Feeling that the abuse is their fault when it is not.
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property.
- Isolation – not seeing friends and family.
- Limited access to money

Sexual abuse

Types of sexual abuse

- Rape, attempted rape or sexual assault.
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts.
- Indecent exposure

Possible indicators of sexual abuse

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing.
- Bleeding, pain or itching in the genital area.
- Unusual difficulty in walking or sitting.
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse.
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis.
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a person.

Psychological or emotional abuse

Types of psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends.
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance.
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse.
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present.
- Withdrawal or change in the psychological state of the person.
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment.

Financial or material abuse

Types of financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service.
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions.
- Arranging less care than is needed to save money to maximise inheritance.
- Denying assistance to manage/monitor financial affairs.
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress.
- False representation, using another person's bank account, cards or documents.
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle.
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity.
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so.
- The person allocated to manage financial affairs is evasive or uncooperative.
- The family or others show unusual interest in the assets of the person.
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA.
- Recent changes in deeds or title to property
- Rent arrears and eviction notices.
- A lack of clear financial accounts held by a care home or service.
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person.
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Modern slavery

Types of modern slavery

- Human trafficking
- Forced labour.
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to
- Being forced or coerced to move or sell drugs on behalf of individuals or gangs (related to county lines activities)
- Being forced or coerced into allowing individuals or gangs to use their place of residence to sell drugs or carry out other illegal activities (known as cuckooing & related to county lines activities)

Possible indicators of modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn.
- Isolation from the community, seeming under the control or influence of others.
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.

- Fear of law enforcers

Discriminatory abuse

Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as **'protected characteristics' under the Equality Act 2010**)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic.
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic.

Possible indicators of discriminatory abuse

- The person appears withdrawn and isolated.
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic.

Organisational or institutional abuse

Types of organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care.
- Abusive and disrespectful attitudes towards people using the service.
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour.
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately.
- Interference with personal correspondence or communication

- Failure to respond to complaints.

Possible indicators of organisational or institutional abuse

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated.
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet.
- Absence of individual care plans
- Lack of management overview and support

Neglect and acts of omission.

Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care.
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed.
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity.

Possible indicators of neglect and acts of omission

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers.
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction.
- Inappropriate or inadequate clothing

Self-neglect

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety.
- Neglecting to care for one's personal hygiene, health or surroundings.
- Inability to avoid self-harm.
- Failure to seek help or access services to meet health and social care needs.
- Inability or unwillingness to manage one's personal affairs.

Indicators of self-neglect

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting many animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury.

Supporting LGBTQ+ Participants

Research from the Office of National Statistics found that, in 2018, an estimated 2.2% of the population aged 16 years and over (1.2 million people) identified themselves as lesbian, gay or bisexual (LGB).

However, it's likely that the real figure is much higher. Previously, the government estimated that 5-7% of the population of England and Wales are LGB - but not all of them will identify themselves as such in research. The government's 5-7% estimate would mean an LGB population of up to 4 million.

There's very little reliable evidence on the trans population in the UK. The best estimate is that around 1% of the population might identify as trans, including people who identify as non-binary.

That would mean about 600,000 trans and non-binary people in Britain, out of a population of over 60 million.

Every young person has the right to be treated with dignity and respect; this includes all young people who openly identify as LGBTQ+ or are thought to be.

Much of this information has been taken from materials developed by Stonewall. For further information visit www.stonewall.org.uk or to speak with someone call 0800 050 2020.

16.3 Appendix 3: Prevent Duty

The government's strategy for countering terrorism CONTEST is split into 4 areas: Pursue, Protect, Prepare & Prevent. All educational institutions have to comply with the Prevent Duty under the Counter Terrorism Act 2015.

The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far-right extremist

groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

The Prevent strategy has 3 key objectives and will specifically:

- 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 ensure that they are given appropriate advice & support.
- Work with sectors and institutions where there is a risk of radicalisation which we need to address.

Within the Home Office Prevent Duty guidance document, it sets out very clear expectations and responsibilities of board members, leaders, managers and staff.

Some of these are detailed below:

“We expect active engagement from boards, managers, leaders & staff with other partners including the police and regional Prevent coordinators”.

“We expect institutions to demonstrate that they undertake appropriate training & development for boards, leaders, managers & staff”.

Prevent is part of safeguarding and everyone has a duty to safeguard young people and adults at risk from all aspects of abuse, exploitation and radicalisation.

Implementing the Prevent Duty can be a sensitive issue, and it is important to reiterate this is not about spying on or about stopping conversations on controversial or sensitive topics. The Prevent Duty is intended to safeguard organisations, participants & staff from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues.

Board of Trustees responsibilities under the Prevent Duty –

- Actively engage with partners, including the police & Prevent coordinators.
- Undertake appropriate training and development in Prevent Duty
- Exemplify British Values in their conduct.
- Ensure robust procedures are in place to ensure any subcontractors are aware of the Prevent Duty and the subcontractors are not inadvertently funding extremist organisations.
- Must comply with the requirements of the Equality Act in ensuring that their organisation challenges discrimination and expects all staff and participants to comply with this legislation also.
- Must ensure the Crawley Town Community Foundation challenges racism, islamophobia, tackle hate & prejudice-based bullying, harassment and intimidation as part of their commitment to exemplification of British Values
- Responsible for ensuring that the Duty and its requirements are communicated to all levels of the organisation – management, staff, volunteers, parents and participants.

Leaders and Managers also have responsibilities under the Prevent Duty.

They must ensure:

- They have active engagement with local partners & support groups and regular contact with Prevent lead.
- Clear, visible policies and procedures for managing whistleblowing & complaints.
- Policies are in place for all who have access to the organisations IT equipment to ensure they are using them safely, legally and securely.
- Prevent compliments the organisations safeguarding, and equality acts and covers welfare & safety of all
- A risk assessment is carried out to address the organisation's implementation of Prevent.
- Robust procedures for managing subcontractors and their awareness and implementation of Prevent.
- Appropriate training of all staff and education participants in Prevent.
- Staff exemplify British Values in their management, teaching/coaching and through general behaviours in the organisation.
- That opportunities are used to promote British Values to young people and adults at risk.
- Robust procedures for sharing information internally and externally about individuals when a concern arises.
- Have a clear Prevent referral process with a single point of contact which is known to all staff and participants.
- Pastoral care is at the heart of the provision and sufficient pastoral care is available to all young people and adults at risk who are vulnerable or being exploited.
- Provide all staff and volunteers training on Prevent and recognising the signs of radicalisation.
- Building resilience:
 - To promote British Values and where appropriate within education or project delivery ensure that specific guidance is provided to those participants.
- IT policies and training:
 - Ensure that young people and adults at risk are safe from terrorist and extremist material when accessing the Crawley Town Community Foundation I.T facilities.
 - Regularly check web filter reports and respond to any concerns raised within them.
 - Revise acceptable use of I.T policies to reflect the Prevent Duty and access to violent or extremist websites.

Channel

Channel is a key element of the prevent strategy and is a multi-agency approach to protect people at risk from radicalisation and from being drawn into committing terrorist-related activity by building on existing collaboration between local authorities, statutory partners, the police and the local community. It is about early intervention to protect and divert people away from the risk they face before illegality occurs. Channel is one tactical option employed by prevent and has recently been placed on a statutory footing. In order to make a referral into the Channel process the Crawley Town Community Foundation will contact the relevant local authority children/adult services helpline number.

Recognising and responding

Identifying someone who is being exploited or radicalised can often be difficult as there is no single pathway to an individual being radicalised. The below information is not exhaustive and the

presence of one of these signs or factors does not necessarily mean that an individual is being radicalised or is involved in extremist activity. However, a combination of these factors may increase vulnerability and/or may indicate that an individual needs support.

Safeguarding from radicalisation is no different to protecting from other forms of harm. Crawley Town Community Foundation and our partners are not expected to be experts in identifying signs of radicalisation and extremism; however, they should have policies and procedures in place, ensure that staff have an awareness through education and empower vulnerable groups. Staff should be vigilant and ensure that they respond swiftly and appropriately to concerns.

Vulnerability

- Identity crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- personal crisis - Family tensions or trauma, sense of isolation, adolescence, low self-esteem, disassociating from an existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and seeking a sense of belonging.
- personal circumstances - Migration, local community tensions, events affecting country or region of origin, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet aspirations - perceptions of injustice, feeling of failure, rejection of civic life.
- Criminality - experiences of imprisonment, poor resettlement/reintegration or previous involvement with criminal groups
- Experience of poverty, disadvantage, discrimination or social exclusion
- Learning difficulties/mental health support needs
- Experienced personal trauma, particularly any trauma associated with war or sectarian conflict.

Behaviours

- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Significant shift in behaviour or outward appearance that suggests a new social/political/religious influence.
- Conflict with family over religious beliefs/lifestyle/dress choices
- Vocal support for terrorist attacks (either verbally or written)
- Witnessed or been the perpetrator/victim of racial or religious hate crime.
- Travel for extended periods of time to international locations known to be associated with extremism.
- Change in emotional behaviour e.g. becoming withdrawn or angry.
- Sharing of views or trying to influence others with extremist ideology.

Access to extremism / extremist influences

- Association with extremist groups or associates/family engaging in extremist activity.

- Accessing the internet for the purpose of extremist activity e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.
- possesses or is actively seeking to possess and/ or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
- Support for groups with links to extremist activity e.g. propaganda distribution, fundraising and attendance at meetings.
- Extremist ideological, political or religious influence from within or outside UK


Handling Concerns

In all circumstances, where staff or volunteers have concerns about someone's behaviour or a disclosure which raises concern regarding radicalisation or extremism, the concern must be brought to the attention of the Crawley Town Community Foundation Designated Safeguarding Lead within 24 hours using the same procedures for raising a safeguarding concern.

The Crawley Town Community Foundation Designated Safeguarding Lead will decide whether the concerns relate to safeguarding and therefore necessitate a safeguarding referral to children / adult social care or whether a dual referral is required to both social care **and Channel** or other statutory agency e.g. police.

16.4

16.5 Appendix 4 What to do if you have a concern about an adult at risk or a disclosure is made.



1	Are you worried about something?	Has a child, young person or adult told you about something, or have seen something concerning?	
2	Is there an immediate danger?	Where a person has been harmed, or are they at immediate risk of harm?	Call 999 for immediate assistance
3	Have you notified the Designated Safeguarding	Notify the DSL of the organisation IMMEDIATELY	Comply with any actions, including making a record
4	Notifying the Designated Safeguarding Lead	Notify CRAWLEY TOWN COMMUNITY FOUNDATION DSL ASAP	darrenford@crawleytownfc.com PHONE: 07519 900303
5	Have you acted on your concern?	Always speak up, even if you're not sure	If you feel you can't report, follow Whistleblowing procedures

Concerns about an adult at risk may come to the attention of staff and volunteers in several ways:

Recognise

- The individual may disclose abuse or neglect.
- Through observation and identifying any behaviours which may be indicators of the possibility of abuse or neglect - For individuals with disabilities it is important to be vigilant of any signs or indicators of upset, having unexplained injuries, presenting differently or reacting differently to people or situations.
- Information may be shared by parents, guardians, carers or other persons or agencies involved with the care or support individual.
- The individual may show some signs of physical injury of which there seems to be no reasonable explanation.
- Conduct issues or observed behaviour of a staff member/volunteer or peer, or in the way the staff member/volunteer or peer relates to an individual which alerts them or makes them feel uncomfortable in some way.
- Observing indicators of inappropriate discussions or behaviours between staff members/volunteers and adults at risk
- Observing dynamics/behaviours which may indicate abuse between adults at risk or directly observing abuse.

- Through social networking media

Respond

In cases of serious incidents that require immediate intervention from emergency services, specialist services and/or senior staff members, where a Critical Incident Plan is in operation for the activity, programme or event, instigate procedures outlined in the plan immediately.

- Ensure immediate safety. **If you feel the adult is at immediate risk of harm or imminent danger, telephone 999 and request the relevant emergency service.**
- Where immediate medical treatment is required, inform paramedics/medical professionals of concerns and ensure that they are aware of any vulnerabilities, impairments or relevant medical issues.
- Where the adult is taken to hospital or a medical centre for treatment, ensure they are accompanied by staff.
- Collect information about the situation and make a thorough and accurate record. Records should include the date and time of the incident or disclosure, parties who were involved, what was said or done and by whom and any further actions taken.
- Seek consent from the Individual to act and to report the concern, considering whether they may lack capacity to make decisions about their own and other people's safety and wellbeing. If it is decided to act against their wishes or without their consent, you must record your decision and the reasons for this.
- Where it has been decided to act against the wishes of the individual, be transparent and ensure they understand that the concern will need to be shared with others.
- Where appropriate, signpost the individual to relevant support services.

Do:

- React calmly and make time for the individual.
- Reassure them they have done the right thing in telling you and that they are not to blame.
- Find an early opportunity to explain you will need to talk to others and explain why.
- Take them seriously.
- Where the individual has a communication impairment or there is a language barrier, be patient and fully consider how best to help them to express themselves.
- All the individuals relay their own account of events without interruption in order to build a clear understanding.
- Sensitively clarify information using "open" questioning techniques i.e. "tell me".
- Do not make promises of confidentiality or keeping secrets.
- Make a full record of what had been said, heard and/or seen as soon as possible. Ensure this includes the time and date, as well as the name of the person completing the record.

Don't:

- Panic or show any personal feelings or reactions to the information being shared.
- Probe or investigate **but** it is acceptable to clarify with what they are telling you after they have given their own account (*what, when, who etc.*)
- Ask leading questions or put words into the individual's mouth.
- Speculate or make assumptions.
- Make negative comments or judgements about the alleged abuser.
- Approach the alleged abuser.
- Make promises or agree to keep secrets.

Report

- Inform the Foundations Designated Safeguarding Lead, or partner organisation Safeguarding Lead at the earliest available opportunity and where possible, before leaving the setting. The partners Safeguarding Lead will then proceed to follow their own organisation's Safeguarding Policies and Procedures and inform the Crawley Town Community Foundation Designated Safeguarding Lead as soon as possible, but within one working day.
- If the Foundations, partner organisation or event Designated Safeguarding Officer is unavailable or cannot be contacted, contact the Crawley Town Community Foundation Designated Safeguarding Lead without delay for advice and where possible within one hour of the concern becoming known.

If above cannot be reached, inform your Line Manager and refer to the contacts below for advice, follow the advice that you are given:

- The FA/NSPCC 24-hour helpline 0808 500 5000
- The FA Safeguarding Case Management Team on 0800 169 1863 #6300

Record

- Complete and return the appropriate reporting form using My Concern to ensure a record of the concern is maintained. Written evidence should be factual. Opinions can be included if it is clearly documented that it is an opinion.
- Records should be completed on relevant electronic systems such as My Concern etc.
- Ensure all records are kept securely and confidentially, in line with GDPR.

Refer

- Where there is immediate danger or concern, following their own internal policy and procedures, the DSO for the setting should make a referral to the Police and/or Adult's Social Care, depending on the nature of the concern.
- DSOs must be aware of governance and reporting requirements for the activity, programme or event and adhere with the process fully processes (for example, in the case of an incident occurring on the NCS programme, make a thorough record on Salesforce and update as required)
- Following any report to the Crawley Town Community Foundation, the Crawley Town Community Foundation Designated Safeguarding Lead will make contact with the setting DSO as soon as possible, but within one working day, ensuring the matter has been followed up appropriately.

The Safeguarding & Incident Manager & CCO/partner organisation DSO will consider the appropriate action to take, taking the following into account:

- the individual's wishes and preferred outcome
- whether the individual has mental capacity to make an informed decision about their own and others' safety
- the safety or wellbeing of young people or other adults with care and support needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

They will consider whether to:

- **Consult** – utilise the support and guidance from statutory bodies and specialist support services to identify the best course of action.

- **Refer** – where the concern meets the threshold, a notification may be made to the Local Authority or regulating body. This ensures that all information is passed through one point of contact and enables responses of agencies to be consistently monitored. This is important at times where several smaller concerns can initiate the escalation process when considered as a whole. This is also essential due to the workforce for certain programmes being made up of temporary/seasonal staff.
- **Monitor** – advise the staff members/volunteers to monitor the situation and individual to further consider the action required.
- **Signpost** – Identify appropriate support services to signpost the individual and/or their parent/guardian to for specialist support. Programme staff are also encouraged to signpost individuals as appropriate.
- **Take no further action** – Some minor concerns brought to the attention of the Safeguarding & Incident Manager or DSO may not require further action. The team will use their knowledge and experience to assess this on a case-by-case basis. However, all concerns brought to their attention will be taken seriously and given due attention.

Note

It is not the responsibility of anyone working for Crawley Town Community Foundation and partner organisations to determine whether abuse has taken place. However, it is the responsibility of everyone working with adults at risk to respond appropriately to any concerns they may have and ensure that these are reported to the relevant agencies in a timely manner so that appropriate action can be taken. The named DSO at the Foundation and partner organisations will take the lead in supporting any staff/volunteers through this process, referring to the EFL In the Community's Safeguarding & Incident Manager for advice, guidance and support as required.

Referring to Football Authorities

Where the setting is within 'affiliated football' e.g. a professional club, community trust or grassroots setting, then the Club or Trust DSO must ensure that The FA Safeguarding Case Management Team, and other Professional Football DSOs are informed in accordance with **Affiliated Football's Policy and Procedures**. A flow chart to support this process can be found on Page 12 of the **Affiliated Football's Policy and Procedures which can be downloaded as PDF here:**

www.thefa.com/football-rules-governance/safeguarding/dealing-with-concerns

- If the concern relates to poor practice, then the setting DSO should follow their procedure for dealing with poor practice concerns in line with affiliated football guidance.

If at any stage you are concerned about the involvement of any DSO in relation to the concern or process, miss them out of the chain of referral and refer to the next DSO in the organisation.

Review

It is important Crawley Town Community Foundation and partner organisations review and reflect upon incidents and concerns to learn lessons and make continual improvements to their safeguarding provision. Depending on the severity of the concern or incident, the way in which

Crawley Town Community Foundation and partner organisations review and make improvements may differ.

Management Information

Policy Name:	Safeguarding Adults at Risk
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Next Review Date:	January 2026
Drafted By:	Darren Ford
Approved by Board Date:	March 2025
Available to staff and / public via:	<ul style="list-style-type: none"> ● Crawley Town Community Foundation website (Staff/Public) ● Breathe HR Portal (Staff)
Linked Policies or procedures:	<ul style="list-style-type: none"> ● Safeguarding Children & Young People ● Whistleblowing Policy ● Safeguarding Easy Read Guide