



## **Crawley Town Community Foundation Safeguarding Adults at Risk Policy**

### **Policy Statement:**

Crawley Town Community Foundation (CTCF) and its Trustees are committed to safeguarding and in promoting the physical and emotional wellbeing of all adults at risk and vulnerable groups involved in any of the programmes run by the Foundation. CTCF will ask for the same commitment from organisations that we work with, staff and volunteers.

All vulnerable groups and adults at risk have the right to protections as defined in the Care Act 2014. All adults have the right to be treated equally regardless of gender, race, religion, age or disability.

*The Foundation has an Equalities and Diversity Policy, which must be read in conjunction with this policy.*

CTCF will adhere to all policies and guidance in the safeguarding and wellbeing of adults at risk and will review policies at the Trustees Sub-Group meetings held quarterly, after any incident that may give cause to review, with organisations we work with and update accordingly and following changes in legislation. Any updates to policy will be communicated to all staff, trustees and where necessary to third parties.

At all times staff must follow safe working practices which include not working alone with a vulnerable group or adults at risk, ensuring that facilities/locations are safe to use, informing the office of where they are for sessions and if an incident occurs. If the session is being held in a facility outside of CTCF ensure that a member of staff there has contact numbers for CTCF staff including their manager/DSO and Deputy DSO.

Staff should at no time allow themselves to be drawn into conversations or circumstances that could endanger themselves, participants and/or parents/spectators.

CTCF will ensure that all staff, including volunteers, are trained in recognising the signs and symptoms of abuse or neglect, how to respond and where to go to for advice and assistance.

CTCF expect all staff to approach their duties in an ethical and safe manner towards all participants and other staff.

*The Foundation has an Ethical Work Policy, which must be read in conjunction with this policy.*



## **Senior Safeguarding Manager**

The Senior Safeguarding Manager (SSM) is responsible for ensuring that Crawley Town Community Foundation has the appropriate policies and procedures in place for identifying and reporting concerns or disclosures related to the protection of children and young people. The SSM is responsible to the Board of Trustees and will report regularly to the Board.

The SSM and DSO of Crawley Town Community Foundation work and support each other in respect of any concern, disclosure or investigation. To identify any safeguarding training requirements and resources required to support any training. They will ensure that all staff/volunteers working with children and young people have the correct level of DBS for the role

***Thura Win (Trustee) is the Senior Safeguarding Manager (SSM) for Crawley Town Community Foundation.*** The Designated Safeguarding Officer (DSO) will report directly to him on any safeguarding issues and policy changes and feedback to all staff. Thura also sits on the Safeguarding Sub Group which reports back to the Board.

## **Designated Safeguarding Officer**

***Crawley Town Community Foundations Designated Safeguarding Officer (DSO) is Birtug Kazim, contact number(s) are 01293 410 000 option 4/07854072572.***

Contact Address

CEO Crawley Town Community Foundation

Checkatrade.com Stadium

Winfield Way

Crawley

West Sussex

RH11 9RX

***2016-2017, Crawley Town Community Foundation appointed Sally Atkins as Deputy Welfare & Safeguarding Officer, contact number 01293 410000 option 4***



The Deputy Safeguarding Officer is responsible to the DSO and SSM, they will cover the DSO duties whenever the DSO is absent from the Foundation and will report to the SSM in the DSO's absence.

**Contact details of the West Sussex Safeguarding Adults Board can be found on page**

The DSO has specific areas of responsibility, including:

- Ensuring the Safeguarding policy is accessible, implemented and regularly reviewed.
- Ensuring all staff have access to appropriate safeguarding training, this is to include reporting procedures.
- Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately.
- Keep up to date with local arrangements and authorities regarding safeguarding and inform staff of any changes to the policy.
- An Annual review will be conducted with the SSM and Board of Trustees along with reviews at the quarterly Safeguarding Sub Group meetings

**Six Principles of Adults at Risk Safeguarding:**

**Empowerment:** support and encouragement to make decisions and informed consent.

**Prevention:** better to take action before harm occurs.

**Proportionality:** the least intrusive response appropriate to the risk presented.

**Protection:** support and representation for those in greatest need.

**Partnership:** local solutions through services working with their communities.

**Accountability:** accountability and transparency in delivering safeguarding.

**Definitions:**

'Adult' is defined by any person over the age of 18.

'Adult at risk' is defined by any person over the age of 18 who is or may be in need of care and support through disability, age or illness; is experiencing or is at risk of abuse or neglect; and is or may be unable to protect themselves from either the risk of, or the experience of abuse or neglect.

'Abuse' is when a person or persons harm, or may be likely to cause harm to the adult at risk whether physical, emotional, sexual, financial or material.

'Harm' may be by direct acts, or the failure to provide care and may be systematic, repetitive or a single incident.



## Wellbeing?

Wellbeing is described as relating to the following:

- Personal dignity which includes being treated with respect.
- Physical, mental and emotional.
- Protection from abuse and neglect.
- Control over everyday life, including care and support provided.
- Participation in education, training or recreation.
- Contribution to society.

## What is abuse?

Abuse is the mistreatment of a person by another that violates an adult's human and civil rights. Abuse can take on many forms (below is an illustrative guide):

**Physical:** assault, hitting, slapping, restraint and inappropriate physical sanctions.

**Sexual:** rape, indecent exposure, inappropriate touching or looking and sexual acts, which the adult has not consented or was, pressured to consent.

**Psychological or emotional:** harassment, verbal abuse, bullying, intimidation, blaming and controlling.

**Financial:** theft, fraud, scamming, coercion in respect of adult's financial affairs including property and misuse of an adult's possessions or property.

**Domestic:** physical, sexual, emotional and psychological.

**Discriminatory:** harassment or slurs because of race, gender or gender indemnity, age, disability, sexual orientation and religion.

**Organisational:** neglect or poor care within a professional care setting such as a care home or hospital. This can result from poor practices, policies, processes and structures.

**Neglect:** ignoring emotional or physical care needs, medication and the withholding of food, water, shelter and warmth.

**Self-neglect:** covers the care of one's personal hygiene, health or home and behaviour such as hoarding.

## Recognising signs of abuse or neglect:

The adult has become quiet, withdrawn or aggressive and may appear unkempt.

Physical signs such as bruises or wounds, also injuries that do not appear to be mending.

The adult does not wish to be left alone with particular people.

A friend or family member raises concerns.

You may hear or see something.

The adult discloses to you that they are being abused or neglected.



If you feel someone is showing signs of abuse, talk to them to see if there is anything, you can do to help. If they are being abused, they may not want to talk about it straight away, especially if they have become used to making excuses for their injuries or change in personality.

Do not ignore your concerns, though. That could allow any abuse to carry on or escalate.

### **Bullying:**

There is no legal definition of bullying but it is usually defined as behaviour that is repeated, intended to hurt either, physically or emotionally or aimed at certain groups because of race, gender, religion or sexual orientation. It can take many forms, which include physical assault, teasing, making threats and cyberbullying via the use of social media, email and mobile phones. Bullying can occur both on-line and off-line and within peer groups.

*CTCF has an anti-bullying policy in place, which covers further examples.*

### **What is a “safeguarding concern”.**

A “safeguarding concern” is when any person has a reasonable cause to think that an adult at risk, who is unable to protect themselves, is experiencing, or is at risk of abuse or neglect.

### **Reporting of concerns:**

All allegations or suspicions are to be taken seriously, react calmly so the adult does not become frightened and withdrawn.

- If there is immediate danger or someone needs urgent medical care call the police or an ambulance, advise them that it is an adult at risk safeguarding concern.
- Ensure that the adult and you are as safe as possible if there is no immediate danger.
- Talk to the adult as soon as possible as long as there is no risk to them or others about what happened and what action they do or do not want taken. Ask open questions rather than leading ones e.g. Can you tell me what happened, when did it happen, where did it happen etc.
- Explain your responsibility to share the information and to who you will share the information.
- Don't try to look into the matter yourself and don't be judgemental.
- Keep an accurate record of the conversation and what actions have been taken. Complete the necessary forms and pass to the DSO to decide if further action or referral needs to be made.
- Be mindful that information regarding safeguarding adults at risk can be particularly sensitive.

**(See flowchart at end of policy titled Raising a Safeguarding Concern)**



Should the allegation not be of a safeguarding concern then you should approach someone you trust and you believe will respond. Should you feel that the response is not satisfactory or you feel you cannot approach someone within CTCF or Trustees then reference should be made to the Prescribed Persons List detailed in CTCF Whistle Blowing Policy. Details on how to raise concerns internally and externally can be found in the Whistle Blowing Policy.

*Crawley Town Community Foundation has a Whistle Blowing policy which should be followed where necessary and should be read in conjunction with the Safeguarding policy.*

### **Responding to a safeguarding concern.**

The following are factors that need to be taken into consideration when responding to a concern:

- The adult's needs for care and support.
- The risk of abuse or neglect.
- The adult's ability to protect themselves.
- The impact on the adult and their wishes.
- The potential of increasing the risk to the adult.
- The possible impact on important relationships the adult may have with support networks.

### **Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned.

Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The Safeguarding Officer.
- The parents of the person who is alleged to have been abused.
- The person making the allegation.
- Social Services / Police.
- The Sussex F.A Child Protection Officer.
- The alleged abuser (and parents if the alleged abuser is a child).

Any confidential information held by CTCF is done so with the explicit consent of parents/carers and those of an age to consent. Anyone that we hold confidential information on is entitled to view the information and request any amendments or deletions.

The Safeguarding Officer will seek advice on who should approach the alleged abuser. Information should be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

The Information Sharing and Confidentiality Policy covers the sharing of information in safeguarding, which is of the utmost importance. This is also covered under Data Protection to ensure that person(s) involved have their identity protected. All staff and coaches must make themselves aware of both Policy and if uncertain to speak to a safeguarding officer.



### **Considerations when sharing information:**

- Adults at risk have a right to independence and choice, including what information is shared. Even when there is no legal requirement to obtain written consent it is good practice to do so.
- The adult's wishes should always be considered, however, information about suspected or actual abuse must be shared when appropriate.
- Information shared, with or without consent should be necessary for the purpose, shared only with those who need it, accurate and up to date and shared securely (in line with Data Protection and the Foundations Data Policy).

*The Foundation has a Data Security policy which must be read in conjunction with this policy, also on Information and Confidentiality.*

Data protection, sharing information and confidentiality are aspects of safeguarding that must be taken into consideration when a concern is raised as our overriding consideration is the welfare of the adult at risk.

Disclosures to staff/other people are more likely to happen on trips or residential visits as the adult at risk may feel more comfortable out of their normal environment. It is important that the above procedures are followed.

*Crawley Town Community Foundation has policies that cover Transport, Trips, and Tours, and a Residential Policy, which must be read in conjunction with the safeguarding policy and are available on the (staff access only) shared drive or a hard copy in the Policy file. We have a safeguarding commitment to adults at risk when in our care.*

### **If someone working with an adult at risk is thought to be the cause of the risk.**

- CTCF have a Whistle Blowing policy in place and the procedures laid out in this should be followed.
- Approach someone you trust to voice your concern and put it in writing.
- CTCF has a responsibility to protect you from harassment or victimisation.
- Request information on the progress of your concern.
- Should you feel that your concern is not being taken seriously or you are unhappy with the progress then contact an organisation that best fits the concern from the prescribed persons list which is with the Whistle Blowing policy.

***CTCF reserves the right to remove the member of staff from the activity, or carry out the necessary measures based on the severity, including disciplinary action. CTCF have a legal duty to inform the Disclosure and Barring Service in certain circumstances, such as in the case of a dismissal. CTCF follows the DBS guidance.***

**Referrals should be made when CTCF has reason to believe:**



- Harmed or poses a risk of harm to an adult at risk
- Has satisfied the harm test; or
- Has received a caution or conviction for a relevant offence and;
- The person being referred is, has or might in future be working in a regulated activity and;
- The DBS may consider it appropriate for the person to be added to the barred list.

SSM, DSO or Deputy DSO are responsible for referrals.

*A copy of the DBS Referral form and Guidance can be found on the Community Shared Drive Policy folder or through the DSO and Deputy Safeguarding Officer.*

### **Code of Conduct.**

- Always work in an open environment and encourage open communication.
- Treat all adults at risk equally with dignity and respect and teaching them to respect their peers.
- Always put the welfare of the adult first, recognise their developmental needs and capacities.
- Build balanced relationships based on mutual trust which empowers the adult to share in the decision making process. Listen to their wishes and take into account their feelings.
- Give enthusiastic and constructive feedback rather than criticism and ensuring spectators and parent/carers follow this guidance
- Involve parents/carers wherever possible.
- Should any form of manual or physical support be required then it should be provided openly and with consent.
- Always follow current safeguarding guidelines.
- Place the wellbeing and safety of the participants above all other considerations

### **Never:**

- Allow or engage in any form of inappropriate touching, rough, physical or sexually provocative games.
- Allow allegations to go unchallenged, unrecorded or not acted upon.
- Use bullying as a form of control.
- Leave yourself open to allegations of abuse by not following current safeguarding guidelines.

CTCF expect staff, participants, parents, volunteers and spectators to respect each other and act with dignity toward each other. Everyone, regardless of their position, should be made aware of what CTCF expect and not to bring CTCF status in the Community into question or public image is harmed by unprofessional conduct.





*The Foundation has a Code of Conduct policy which must be read in conjunction with this policy.*

### **Recruitment of staff and volunteers.**

- CTCF has in place a Recruitment Policy which should be followed.
- All staff invited for an interview must be able to prove that they have a right to work in the UK.
- At the interview stage the applicant may be asked to provide a disclosure statement for any criminal convictions following NACRO guidance on the recruitment and employing of ex-offenders as to what is an exempt caution or conviction under the Rehabilitation of Offenders Act 1974 so an appropriate risk assessment may be made. *A copy of the guidance is available for those in the recruitment process.*
- All staff and volunteers are required to hold a valid DBS certificate, should one not be held then they will be required to apply for an Enhanced check and will not be able to participate in regulated activities until received.
- References will be required should the offer of a position be made and the applicant must be able to provide contact details of two persons that may be approached for them.
- All staff and volunteers are required to undergo an induction which will include safeguarding policies and procedures, health & safety policy and procedures, whistle blowing, bullying, code of conduct and an understanding of all other policies of CTCF.
- All staff and volunteers will also undergo continuous safeguarding training to ensure that all legal requirements and updates are made known and adhered to.

### **Use of multi-media, photographic/filming equipment at sessions or events**

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of sportspeople in vulnerable positions. All staff and volunteers should be vigilant and any concerns should to be reported to the Safeguarding Officer.

Photographs and/or video's are only to be taken using CTCF equipment which is securely stored away.

Photographs and/or videos are only taken with the explicit consent of participants of an age to consent. The consent has to a positive opt in action and is recorded.



The use of any images is again with explicit consent and with the knowledge of what the images will be used for i.e. training, marketing.

*The Foundation has Data Security Policy guidelines, which must be followed.*

Personal mobile devices or cameras are not to be used under any circumstances.

The Football Association has issued detailed guidance on this issue and reference should be made to the FA web site for more information.

### **Social Media & Media**

The use of Social Media has become more prevalent in recent years and the use of it to record and send images. CTCF staff are not permitted to use their personal mobile phones/IPads or cameras for the recording of images. CTCF has equipment for the use of staff when recording images.

Prior to the taking/recording of images then consent **MUST** have been given by the participant or parent/carer, this consent must be explicit and the participant or parent/carer must be made aware of what the images will be used for.

At no time are staff/volunteers to engage with participants via any form of social media and should actively discourage children and young people from inviting them to groups on social media.

All programmes have a consent form attached which must be completed and recorded in line with Data Protection.

*The Foundation has Data Security Policy guidelines, which must be followed.*

### **Alcohol and Drug Abuse**

An adult at risk can become dependent on alcohol or drugs, or it may be that they have become “at risk” due to alcohol or drug abuse. Those that abuse either alcohol or drugs may show the following:

- Deterioration in physical or mental health
- Alienation
- Aggression/mood changes
- Verbal and physical aggression
- Risk taking behaviour
- Offending behaviour
- Vulnerable to exploitation
- Financial impact



It is important to differentiate the above from what would be their normal behaviour before raising a concern, if you feel you are unable to do this then raise the concern and allow those with the necessary knowledge and training to make a referral if necessary.

The following websites will be able to offer guidance and information:

Alcoholics Anonymous: [www.alcoholics-anonymous.org.uk](http://www.alcoholics-anonymous.org.uk)

Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com) (a national drug education service who can advise on effect and dangers of different drugs)

### **Complaints and Appeals**

Crawley Town Community Foundation has a Complaints Procedure on its website and covered in the Complaints and Appeals Policy.

Any complaint made must be followed up within 3 working days if only acknowledgement that it is being dealt with whilst investigations are made.

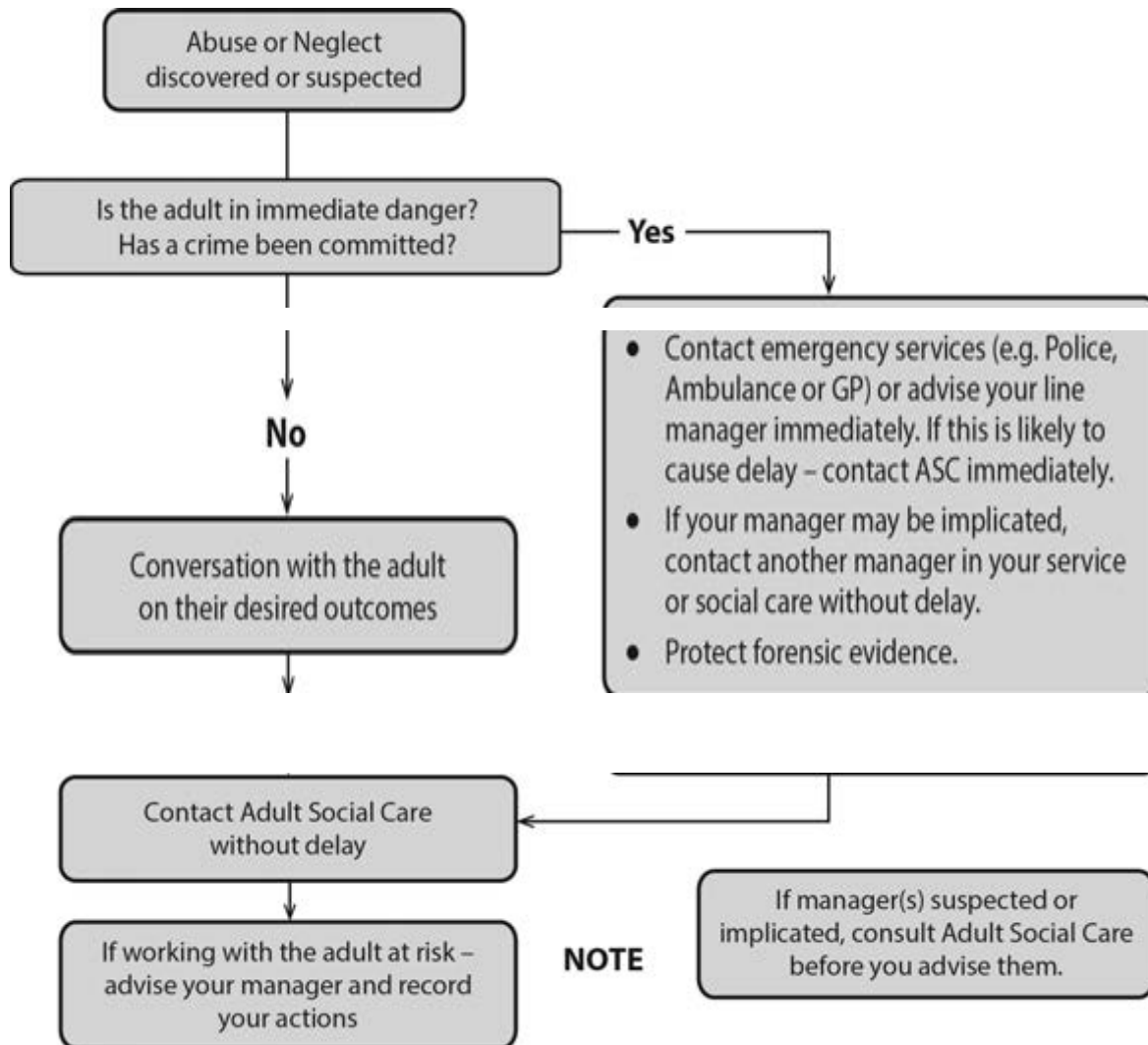
An appeal against a complaint should be made in writing / email to the head of CTCF and an acknowledgement of receipt made. Any appeal will be heard by the head of CTCF and/or a Trustee and the outcome of the appeal given in writing / via email.

### **Partnerships and Service Level Agreements**

When CTCF enter into a new partnership whether it be project delivery or hiring of equipment then a Service Level Agreement (SLA) must be drawn up and signed by both parties. The SLA should state the Foundation reserves the right to follow its own Safeguarding Policy should there be any doubt or clarity. The SLA's must be updated annually and kept on file.

**Crawley Town Community Foundation related policies must be read in conjunction with the Safeguarding Adults at Risk Policy. It is our duty to ensure the safeguarding and wellbeing of any participant on our programmes. All these policies link to form the safeguarding chain.**

## **Raising a safeguarding concern**



Email: [socialcare@westsussex.gov.uk](mailto:socialcare@westsussex.gov.uk)

Phone: 01243 642121

Website: [www.westsussex.gov.uk/social-care-and-health/social-care-support/adults/contact-us-for-social-care-support-or-advice](http://www.westsussex.gov.uk/social-care-and-health/social-care-support/adults/contact-us-for-social-care-support-or-advice)

Address: West Sussex County Council Adults' CarePoint, Second Floor, The Grange, County Hall, Chichester, West Sussex PO19 1RG

(A copy of the Adult safeguarding Concern Form can be found on the shared drive or through the website.)



## **Contacts**

### **West Sussex Safeguarding Adults Board**

[www.westsussexsab.org.uk](http://www.westsussexsab.org.uk)

01243 642121

### **Crawley CCG**

[www.crawleyccg.nhs.uk](http://www.crawleyccg.nhs.uk)

[crawleyccg@nhs.net](mailto:crawleyccg@nhs.net)

01293 600300 ext 4255

### **West Sussex CCG**

[www.coastalwestsussexccg.nhs.uk](http://www.coastalwestsussexccg.nhs.uk)

[coastal@nhs.net](mailto:coastal@nhs.net)

01903 708400

### **Disclosure and Barring Service**

[customerservices@dbs.qsi.gov.uk](mailto:customerservices@dbs.qsi.gov.uk)

03000 200 190

### **Multi Agency Risk Assessment Conferences (MARAC)**

[MARAC@westsussex.gcsx.gov.uk](mailto:MARAC@westsussex.gcsx.gov.uk)

### **Sussex Oakleaf (People aged 16-25)**

[sussexoakleafreferrals@nhs.net](mailto:sussexoakleafreferrals@nhs.net)

01293 534782 (Crawley & Horsham)

01444 416391 (Mid Sussex)

## **Relevant Associated Legislation**

Care Act 2014

Safeguarding Vulnerable Groups Act 2006

No Secrets 2000 –replaced by Chapter 14 of the Care Act 2014

NACRO Guidance-Recruitment of ex-offenders

Statement of Government Policy on Adult Safeguarding May 2013

Mental Capacity Act 2005



## **Policy Endorsement**

The Chair of Trustees and Trustees endorse the Safeguarding of Adults at Risk Policy. Any changes in legislation or updates to the policy are communicated to the Trustees at the Safeguarding Sub Group meetings and the Board of Trustees meetings.

Signed:

VIC MARLEY

Chair of Trustees.