



# Safeguarding Adults at Risk Policy & Procedures

August 2022 (V0822)

## Principles

The Arsenal Football Club Limited ("the Club") is committed to safeguarding and protecting adults at risk and fully accepts its responsibility for the safety and welfare of all adults at risk who engage with the Club. Simple flowcharts on how to respond to a safeguarding concern and what constitutes abuse and neglect can be found in Appendices 1, 2, 3 and 4.

The welfare of adults at risk is of paramount importance and all adults at risk have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion, belief or age. Through the application of policy, procedures and best practice, the Club promotes the safety, welfare and well-being of all adults at risk enabling them to participate in any Club activity in an enjoyable, safe and inclusive environment. This equally applies to the safety and security of those working with and who are responsible for the activities involving adults at risk.

Employees, workers, consultants, agency staff and volunteers who come into contact with adults at risk in Club related activities should be positive role models and display high moral and ethical standards in line with the Club's vision and values.

This Policy and Procedures are approved by Islington Safeguarding Adults Unit and is compliant with legislation including but not limited to the Care Act 2014, statutory guidance, regional policies such as the London Multi-Agency Safeguarding Adults Policy and Procedures (2019) and governing body rules and regulations including the FA Premier League Rules and FA Rules. This Policy and Procedure should be read in conjunction with related Club policies and procedures, a list of which are available in Appendix 5.

## Scope

This Policy is for use across the Club and is to be observed by all those working and coming into contact with adults at risk to ensure best practice in safeguarding is promoted and adhered to.

Activities undertaken at the following locations/departments are under the remit of this policy including:

- Arsenal in the Community;
- Arsenal First Team and Youth Academy training ground (London Colney);
- Arsenal Women Football Club;
- Emirates Stadium;
- Arsenal Retail Stores (including The Armoury and Highbury House);
- Stadium tours, Museum tours, Stewarding and all other activities on matchdays and roles that comes into contact with adults at risk;
- Travel, Events and Supporter Liaison;
- Youth Academy (Hale End).

All employees, workers, consultants, agency staff and volunteers are made aware of the Policy and Procedures through induction and where appropriate their work with adults at risk is supported by a comprehensive on-going safeguarding training programme.

## Definition of an Adult at Risk

An adult at risk is defined as someone who is aged 18 or over and:

- Has needs for care and support (whether or not the local authority is meeting any of those needs);
- Is experiencing, or is at risk of, abuse or neglect, and;
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

*Care Act 2014, Section 14.2*

Safeguarding adults at risk is defined as:

- Protecting their rights to live in safety and to be free from abuse and neglect;
- People and organisations working together to prevent the risk of abuse or neglect, and to stop these from happening.

*Care and Support Statutory Guidance  
2020, Chapter 14*

## Recruitment and Disclosure

As part of the Club's recruitment and selection process, offers of work for positions which come into contact with adults at risk are subject to a satisfactory self-declaration and a criminal record check ("DBS Check") as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable. All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Club, the person concerned is not permitted to commence work.

All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS checks, normally every three years or earlier if required.

Should any person's DBS check reveal any cautions, convictions, community resolutions, warnings or final reprimands the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with adults at risk. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment is carried out to evaluate the information contained within the disclosure certificate. The person may also be required to attend a risk assessment meeting with a Departmental Safeguarding Officer (DSO) and/or a member of the Club's Safeguarding Team prior to a recruitment decision being made.

Further information can be found in the Club's Recruitment Policy and Safer Recruitment Guidance available on the Club's intranet.

All new employees, workers, consultants, agency staff and volunteers working with adults at risk at the Club are required to complete a self-declaration on commencement of duties.



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When the Club uses suppliers or agencies to undertake its work, they are subject to rigorous vetting and safeguarding checks and required to adhere to the Club’s policy and procedures as set out in their contracts or service level agreements where relevant.

## Induction and training

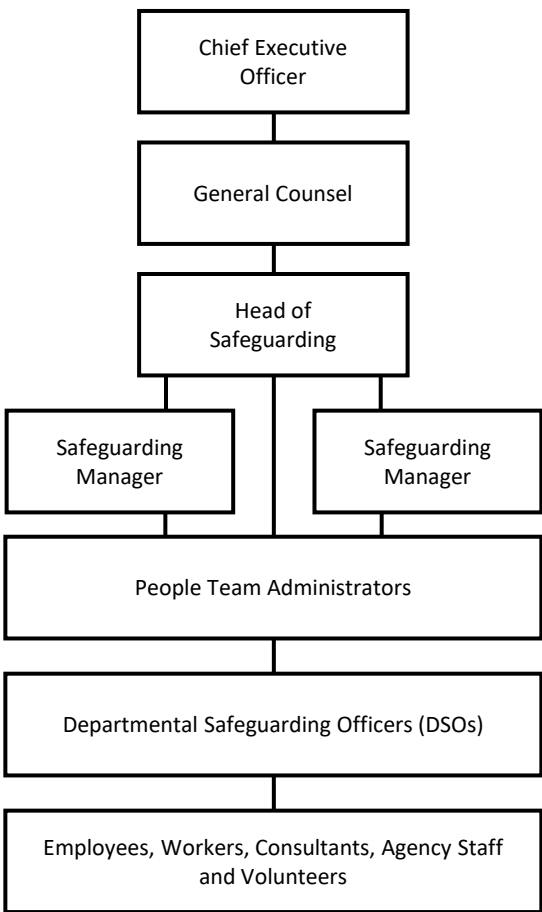
During the induction process, employees who work with or come into contact with adults at risk are required to attend the Club’s safeguarding and protection training along with the Premier League safer working practice training. Employees also receive a copy of this Policy and Procedures as well as other Club policies and are required to sign an acknowledgement that they have read and agree to abide by them.

Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with adults at risk will undertake both Club and Premier League training. They also receive copies of the Club’s Safeguarding Policies and Procedures and are expected to read and abide by them as set out in their Agreements.

Refresher safeguarding training is provided every three years or earlier as required.

## Roles and responsibilities

The Club has a comprehensive safeguarding structure which ensures the safety and welfare of all adults at risk who interact with the Club. For the purpose of this Policy and Procedure the Safeguarding Team consists of the Head of Safeguarding, the Safeguarding Coordinators and the People Team Administrators.



The Club’s **Chief Executive Officer** is responsible for ensuring that safeguarding is a key priority at the Club and for providing Club-wide strategic leadership that assists the Club to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Executive level.

The Club’s **Head of Safeguarding** is responsible for the strategic and operational direction and embedding safeguarding across the Club. The Head of Safeguarding is also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer. If the Head of Safeguarding is absent from work for an extended period or the position becomes vacant, the **General Counsel** will assume the positions of Head of Safeguarding and Lead Disclosure Officer. Should this situation arise, the new arrangement will be clearly communicated across the Club.

The **Safeguarding Managers** are responsible for all operational aspects and embedding safeguarding in all of the football related areas as well as being the lead point of contact in all those areas.

**People Team Administrators** are responsible for ensuring all vetting checks including criminal record checks adhere to the Club’s Recruitment Policy as well as legislation and governing body rules.

**Departmental Safeguarding Officers (DSO’s)** are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

**Employees, workers, agency staff, consultants and volunteers** are responsible for familiarising themselves with the Club’s policy and procedures, ensuring the safety and welfare of all adults at risk as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.

## Abuse and Neglect

There are 10 recognised categories of abuse under the Care Act 2014:

1. Neglect and acts of omission;
2. Sexual abuse;
3. Physical abuse;
4. Psychological/emotional abuse;
5. Discriminatory abuse which includes hate crime;
6. Financial or material abuse;
7. Organisational abuse;
8. Domestic violence when the victim is an adult at risk;
9. Modern slavery; and
10. Self-neglect which includes hoarding.

Full descriptions of each category of abuse and neglect can be found in Appendix 4.

Adults at risk may be at additional risk of abuse and neglect through some of the additional vulnerabilities they may face.



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## Additional vulnerabilities

Some adults at risk may have additional vulnerabilities and therefore when coming into contact with the Club, further safeguards may need to be put in place to reduce the potential risk of abuse and neglect.

### Online world

Although the online world provides many benefits, there are also a number of potential associated risks for adults at risk:

- Inappropriate language or images;
- Online grooming;
- Cyberbullying; and
- Sexting.

Further information about the online risks is contained in the Club's Safeguarding Social Media Policy and Procedure which can be accessed on the Club's intranet.

### Radicalisation and extremism

Radicalisation and extremism of adults at risk is a form of psychological/emotional abuse. HM Government states that the aim of radicalisation is to attract people to a particular extremist ideology. In many cases it is with a view to inspiring an adult at risk to eventually become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The Club aims to prevent radicalisation and extremism through training and educating adults at risk in activities undertaken with the Club.

### Use of photography and film

All images are taken by Club photographers who have been briefed by a Club DSO or by a member of the Communications Department responsible for the activity being photographed or filmed in an appropriate way and manner. Before taking images of adults at risk, the adult at risk or if they do not have capacity, his/her carers consent is sought in writing at the start of the season or prior to an event. In line with the Mental Capacity Act (2005), the Club will always ensure the best interests of the adult at risk and least restrictive option is considered which may include the adult at risk not being photographed or filmed in Club activities.

## Good practice and code of conduct

To ensure adults at risk have the most positive and safe experience when engaging with the Club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of potential allegations, abuse and neglect occurring):

- Listen carefully to adults at risk about his/her needs, wishes, ideas and concerns and take them seriously;
- Treat all adults at risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the adult at risk;
- If adults at risk have to be supervised in changing rooms always ensure coaches etc. work in pairs;
- Request written consent if the Club are required to transport adults at risk using the Club's Multi-Use Consent Form (Appendix 6) for any significant travel arrangements e.g. overnight stays;
- Coaches maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with adults at risk, including only engaging with adults at risk online with prior approval and through the Club's social media channels;
- On tours, ensure that adults should not enter an adult at risk's room unless there is a safety concern, in which case two adults should enter and also should not invite adults at risk into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of adults at risk;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the Club's vision and values and be an ambassador for those values;
- Ensure adults at risk adhere to his/her relevant Code of Conduct;
- Secure written consent for the Club to administer emergency first aid or other medical treatment if the need arises;
- Reward effort as well as performance;
- Challenge unacceptable or inappropriate behaviour;
- Encourage adults at risk to take responsibility for their own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident Management System (near misses can be reported using Health and Safety's "Flag it" system ( both Appendix 7);
- Recording safeguarding concerns on MyConcern or the Safeguarding Concern Form (Appendix 8).

This list is not exhaustive.



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## Unacceptable practice

The following are regarded as unacceptable practice and should be avoided by all employees, workers, consultants, agency staff and volunteers:

- Unnecessarily spending excessive amounts of time individually with an adult at risk away from others;
- Being alone in changing rooms, toilet facilities or showers used by adults at risk;
- Taking adults at risk alone in a car journey unless written consent is sought from the Club's Safeguarding Team for emergency situations;
- Taking adults at risk to your home or in a place where they will be alone with you;
- Sharing a room with an adult at risk;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing adults at risk to use inappropriate language unchallenged;
- Making sexually suggestive comments to an adult at risk, even in fun;
- Reducing an adult at risk to tears as a form of control;
- Allowing allegations made by an adult at risk to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that the adult at risk can do for themselves;
- Not recording safeguarding concerns on MyConcern or the Safeguarding Concern Form;
- Having adults at risk engaged with the Club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram;
- Sending inappropriate text messages or social media messages to adults at risk;
- Engaging with adults at risk on 'one to one' personal electronic communications.

This list is not exhaustive.

## Searching adults at risk

To ensure the safety and security for all Club activities all adults at risk may be subject to the Club's search process. Adults at risk are asked to self-search as the preferred method; however, should the Club suspect that the adult at risk may be concealing a prohibited item, consent will be sought from the adult at risk and/or their carer before a Steward or Security member of the same sex being observed by a Supervisor searches the adult at risk.

## Risk assessments

For all Club activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The Club's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Club learns from such matters.

Where an adult at risk is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the Club's care. The risk assessment should set out what arrangements are in place for his/her care and supervision and how risks will be minimised. Activity leaders will be required to continually update risk assessments whilst leading such activities.

## Supervision of adults at risk

The Club adheres to best practice guidance from the local authority in relation to the supervision of Club employees or workers to adults at risk. Generally, there should always be a minimum of two Club employees or workers and ratio of:

- One Club employee or worker to every ten adults at risk.

Particular activities may require more or less Club employees or workers to adult at risk ratios due to:

- Needs and capacity of the adults at risk;
- Nature of the activity and environment;
- Risk assessments or intelligence information identifying potential behavioural or other issues;
- Expertise and experience of the staff involved;
- Mixed gender adult at risk activities will require adults of both genders to supervise where possible.

Should the ratio not be suitable, the Club's Safeguarding and Health and Safety Teams make a decision whether the activity or event takes place.

## Working with external partners

The Club always ensures external partners and organisations we engage with promote the safety and welfare of adults at risk and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the Club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Club's standards.



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## Referrals

If the Club has safeguarding concerns in relation to an adult at risk or their carers, the Club may refer these concerns to external agencies. External agencies include, but are not limited to adult social care, children's social care, the police, health agencies, the FA and the Premier League (Appendices 1, 2 and 3).

## Confidentiality

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only which would not normally include anyone other than the following:

- The Safeguarding Team;
- The adult at risk or the person raising the concern;
- The carer of the adult at risk who is alleged to have been abused, where appropriate;
- Local Authority and Police;
- Dependent on role, the National Governing Body.

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about adults at risk in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. Confidential or personal information about an adult at risk should not be used for their own or others advantage.

Confidential information about an adult at risk should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the adult at risk's identity does not need to be disclosed, the information should be handled anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteers may be expected to share information about an adult at risk, for example when abuse is alleged or suspected. In such cases, employees, workers, consultants, agency staff and volunteers have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities (DSO and Safeguarding Team).

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the Club's Safeguarding or Legal Team. The storing and processing of personal information about adults at risk is governed by the Data Protection Act 2018.

## Information sharing

The Club abides by the 7 guiding principles as set out by HM Government on sharing information:

1. The Data Protection Act 2018, the General Data Protection Regulation 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about an adult at risk is shared appropriately;
2. Openness and honesty with the adult at risk (and/or their carer/family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;
3. Advice is sought from the Club's Safeguarding and/ Legal Team if there is any doubt about sharing the information concerned, without disclosing the identity of the adult at risk where possible;
4. Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the Club's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;
5. Safety and well-being of the adult at risk is always considered;
6. Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;
7. Records of the Club's decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on MyConcern (Appendix 8).

The Club will share information with the relevant statutory agencies, the Premier League and FA where appropriate in relation to safeguarding cases.

## Review

The Club shall review this Policy and Procedures at the end of every season or whenever there is a change in legislation, guidance, governing body rules or learning from safeguarding cases.





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## Procedures

### Consent

The first priority in safeguarding should always be to ensure the safety and welfare of the adult at risk. If concerns arise consent must be obtained from the adult at risk concerned before a referral is made to Local Authority Safeguarding Adults Team or the Police. If the adult at risk refuses to give consent, the employee, worker, consultant, agency staff or volunteer should seek advice and support from their DSO or the Club's Safeguarding Team. Information should not be given to carers or other adults involved without the consent of the adult at risk. There are a number of circumstances whereby an external referral can be made without consent and these include:

- The adult lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act (see Appendix 9);
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent;
- Other people are, or may be, at risk, including children and young people;
- Sharing the information could prevent a serious crime;
- A serious crime has been committed;
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral;
- Employees, workers, consultants, agency staff and volunteers are implicated;
- There is a court order or other legal authority for taking action.

### Responding to disclosures and concerns

It is not the responsibility of anyone within the Club to decide whether or not abuse has taken place. However, there is a responsibility to act on any concerns. The Club assures all employees, casual workers, agency staff, consultants or volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague or another is, or may be, abusing an adult at risk.

If an adult at risk informs you directly that they are concerned about another person's behaviour towards him/her, this is known as a disclosure. In this situation the following steps should be taken:

- Take the adult at risk to a safe and quiet place;
- React calmly so as not to frighten the adult at risk;
- Tell the adult at risk that he or she is not to blame and that he or she was right to tell you;
- Take what the adult at risk says seriously and do not be judgmental;
- If emergency medical treatment is needed, telephone for an ambulance;
- Avoid leading the adult at risk in discussion and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said;
- Reassure the adult at risk but do not make promises of confidentiality or outcome;
- No contact should be made with the alleged abuser, particularly if this is another adult at risk or the carer of the alleged victim;
- Do not commence an investigation into the incident;
- Refer the concern to the Safeguarding Team immediately;
- Make a record using MyConcern or the Club's Safeguarding Concern Form.

For a flowchart of the process to follow, please see Appendices.

### Preserving the evidence

Your first concern is the safety and welfare of the adult at risk. However, your efforts to preserve evidence may be vital. In all cases the preservation of evidence is crucial especially if any police investigation is required to be effective. What you do or do not do in the time whilst you are waiting for the police to arrive may make all the difference. Below are some helpful points:

In situations of physical and/or sexual assault:

- In physical abuse cases, where an adult at risk wishes to show you an injury, only observe what he/she consents to show you and what is appropriate;
- Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum;
- Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum. Place the items/weapons in a clean dry place to hand to the police;
- Preserve anything that was used to comfort the abused adult at risk, for example a blanket;



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- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused adult at risk and/or the alleged perpetrator, until the police arrive.

Prior to the arrival of the police and medical examination:

- Ensure that no one has physical contact with both the abused adult at risk and the alleged perpetrator as cross contamination can destroy evidence;
- Encourage the victim not to shower;
- Encourage the victim not to change clothing;
- Even when the adult at risk says they do not want police involvement, preserve items anyway as the adult at risk may change his/her mind later or you may be legally obliged to inform the police;
- Encourage the adult at risk not to eat or drink if there is a possibility that evidence may be obtained from the mouth.

## Managing allegations against employees, workers, consultants, agency staff and volunteers

Allegations against members of staff working with adults at risk are managed in a similar manner as allegations against adults working with children and young people. These processes are applicable in instances where there is an allegation or concern that a member of staff or volunteer has:

- Behaved in a way that has harmed or may have harmed an adult at risk.
- Possibly committed a criminal offence against or related to an adult at risk.
- Behaved towards an adult at risk in a way that indicates he/she is unsuitable to work with an adult at risk
- Demonstrated behaviour in their personal life that might indicate unsuitability to work with adults who are at risk of harm.

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to an adult at risk, this should be reported to the Club's Safeguarding Team who will take such steps as considered necessary to ensure the safety of the adult at risk in question and any other person who may be at risk. The employee, worker, consultant, agency staff or volunteer raising the concern should raise a Concern on MyConcern or complete the Club's Safeguarding Concern Form (Appendix 8). When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Safeguarding Adults Team and/or the Police;
- The carers of the adult at risk will be contacted as soon as possible, if applicable, following advice from statutory agencies;

- Senior Management will be notified and if applicable the Premier League and the FA;
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the General Counsel who will refer the allegation to the appropriate statutory agencies;
- If required, a full investigation and possible disciplinary action in accordance with the Club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated;
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS).

For a flowchart of the process to follow, please see Appendix 3.

## Managing concerns for an adult at risk

Any concern relating to the abuse of an adult at risk by another adult at risk must be dealt with through this Policy and Procedures. Any such concern should be reported immediately to the DSO who will inform the Safeguarding Team.

## Making a referral

All employees, workers, consultants, agency staff and volunteers should complete the Club's Safeguarding Concern Form (Appendix 8) after referring any case to the DSO and/or Safeguarding Team, or raise a Concern on MyConcern depending upon instruction from the DSO and/or the Safeguarding Team. The Safeguarding Team will contact the relevant Local Authority Safeguarding Adults Team completing their Referral Form and update the Safeguarding Concern Form for the Club's records.

## What to do if an adult at risk is in danger of immediate harm

The first priority is to ensure the adult at risk is in a safe place away from the alleged perpetrator. Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants or volunteers. In addition, employees, workers, consultants, agency staff and volunteers should have, readily available, all the contact numbers of the Club's Safeguarding Team, DSOs, colleagues, or other services which can assist in an emergency or urgent situation.

Report the matter to the Safeguarding Team and/or General Counsel at the earliest opportunity.

In the absence of the Safeguarding Team and/or General Counsel, contact the London Borough of Islington Adult Access and Advice Team (telephone 020 7527 2299) and/or the police on 101 for help and to ensure the correct procedure is followed.



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## When to call the Police

Even when a matter is not an emergency (e.g. no risk of immediate harm), consideration must still be made on whether to make a Police report and when liaising with the Police on any safeguarding matters.

The National Police Chief's Council (NPCC) have created guidance which helps to clarify when to consider calling the Police and what to expect when a report is made.

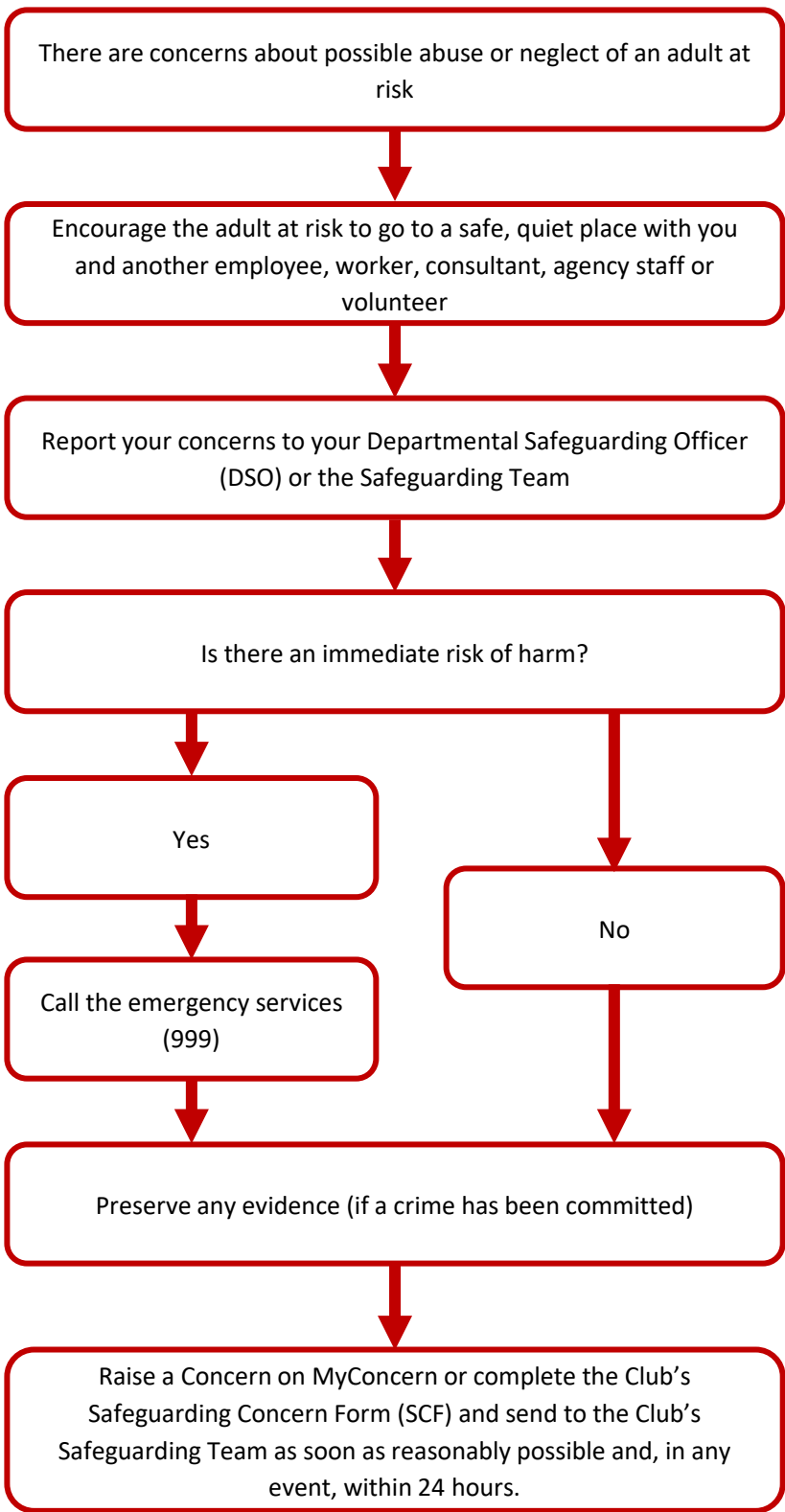




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## Appendix 1

Flowchart for employees, workers, consultants, agency staff and volunteers who raise a concern about an adult at risk

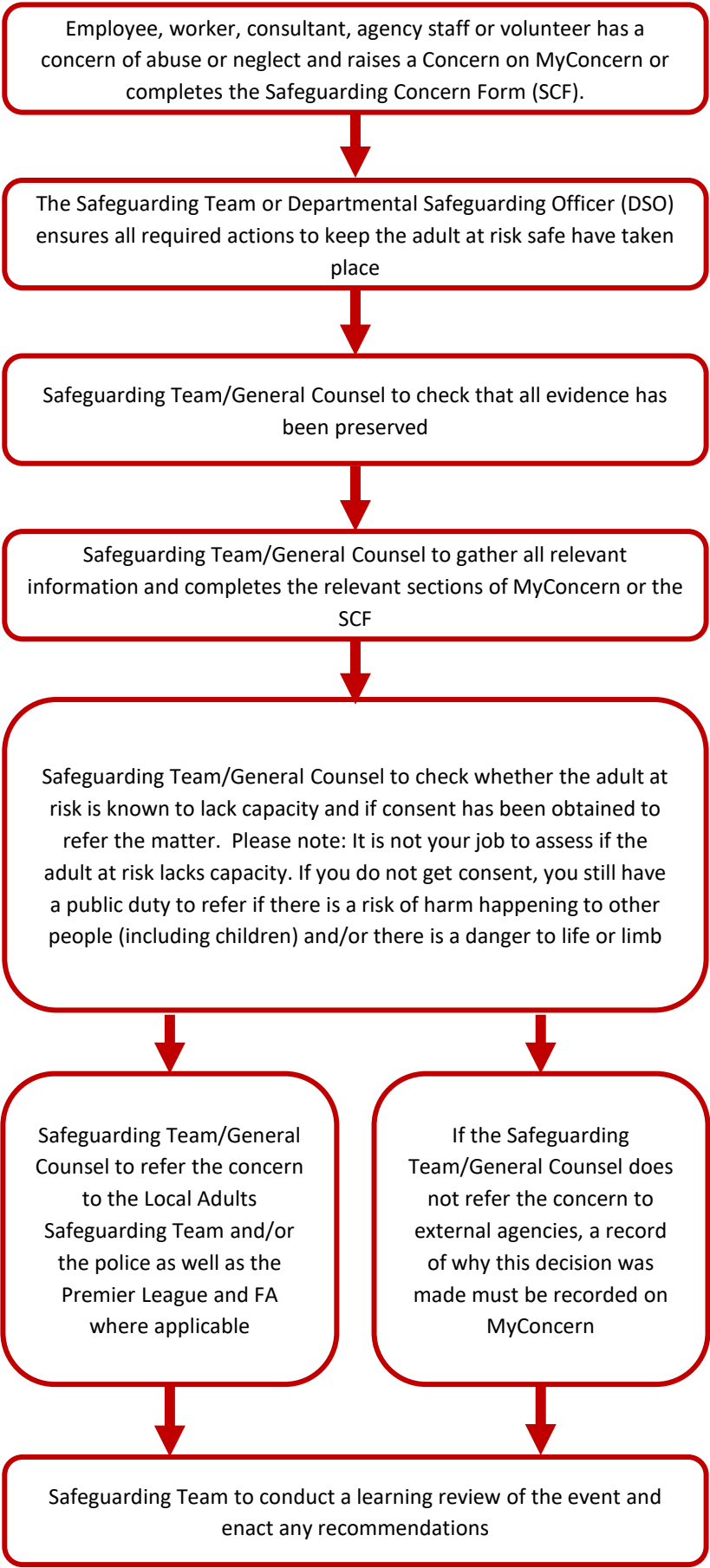




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## Appendix 2

### Flowchart for Departmental Safeguarding Officers (DSOs) and Safeguarding Team making a referral

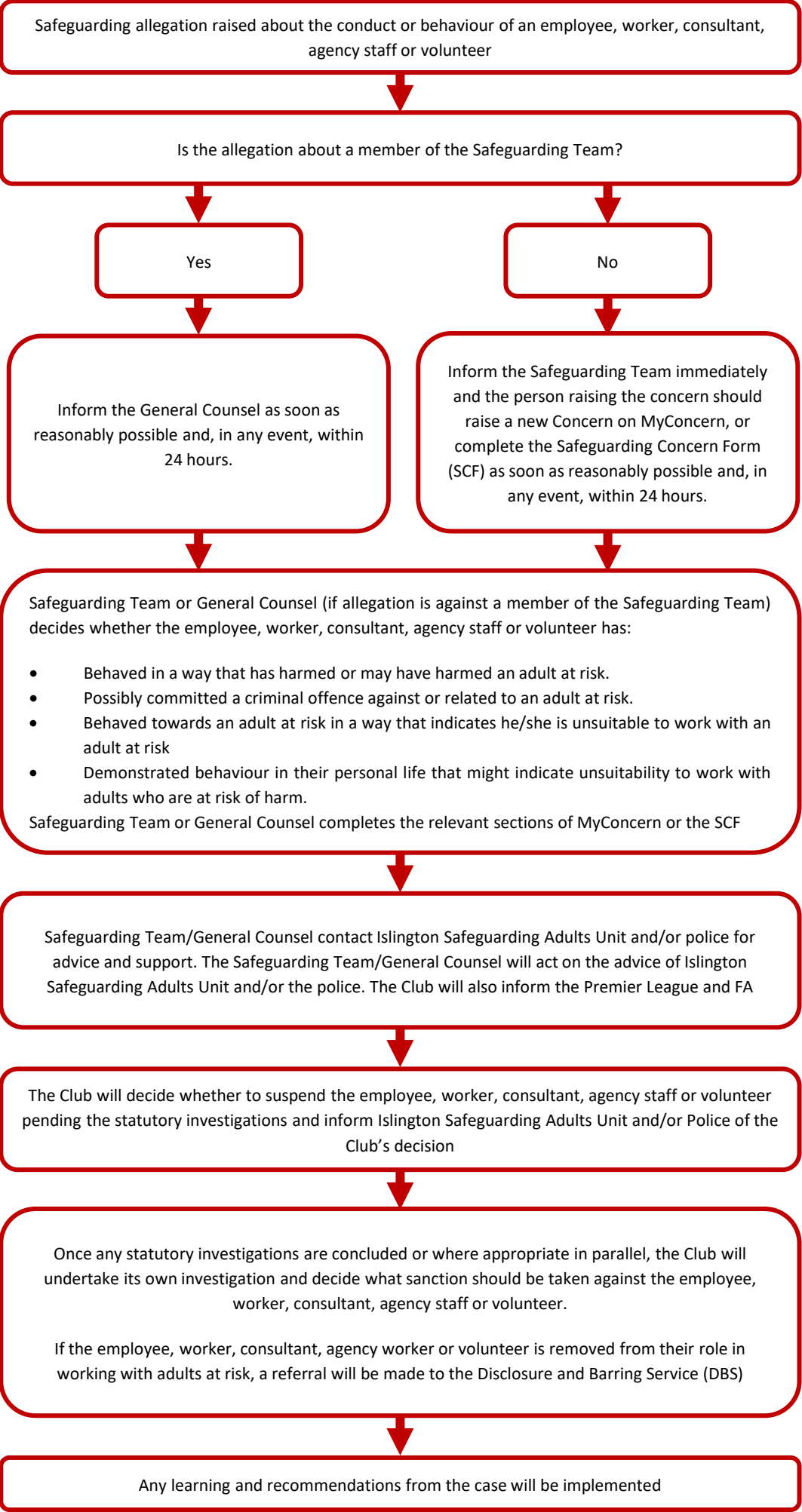




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## Appendix 3

### Allegations against employees, workers, consultants, agency staff or volunteers flowchart





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## Appendix 4

### Categories of abuse and neglect as defined by the Care and Support Statutory Guidance (2014)

Neglect and acts of omission	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
Sexual abuse	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
Physical abuse	Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanction.
Psychological/emotional abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Discriminatory abuse including hate crime	Forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
Financial or material abuse	Theft, fraud, internet scamming, coercion in relation to an adult at risk's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Organisational abuse	Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
Domestic violence	Psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence; female genital mutilation; stalking and forced marriage.
Modern slavery	Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.



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## Appendix 5

### Applicable Club policies and procedures

Bullying and Harassment Policy	Recruitment Policy (and Safer Recruitment Guidance)
Data Handling and Protection Policy	Safeguarding Children and Young People Policy and Procedures
Disciplinary Policy	Safeguarding Policy – Low Level Concerns
Domestic Abuse Policy	Safeguarding Social Media Policy
Equal Opportunities Policy	Social Networking Policy
Grievance Policy	Transport Policy
Health and Safety Policy	Whistleblowing Policy
Human Rights and Modern Slavery Policy	

### Key government initiatives and legislation

Achieving Best Evidence 2002	Modern Slavery Act 2015
Care Act 2014	Police Act 1997
Counter-Terrorism and Security Act 2015	Premier League Guidance for Safer Working Practice
Equality Act 2010	Premier League Rules
FA Respect Codes of Conduct	Protection of Freedoms Act 2012
General Data Protection Regulation 2018	Rehabilitation of Offenders Act 1974
HM Government Information Sharing Guidance for Practitioners 2015	Safeguarding Vulnerable Groups Act 2006
Human Rights Act 1998	Sexual Offences Act 2003
Mental Capacity Act 2005	

These lists are not exhaustive.



# Safeguarding Adults at Risk Policy & Procedures

## Appendix 6

### Multi-use consent form



## THE ARSENAL FOOTBALL CLUB PLC GENERAL CONSENT FORM – UNDER 18s SEASON 2020/21

### A. ACTIVITY

Name of Event/Detail	
Date(s) or Time Period	

### B. PARTICIPANT'S DETAILS

Name	Firstname	Surname
Date of Birth		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		
School/College Name and Address (if relevant)		

### C. PARENT/LEGAL GUARDIAN/CARER DETAILS

Name	Firstname	Surname
Relationship to child		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		

### D. PHOTOGRAPHS, IMAGES AND VIDEOS

I, the undersigned, by ticking the box below, hereby grant or deny permission to The Arsenal Football Club PLC and all of its associated companies (the "Club") to use photographs, images and/or videos of the child named in Section B (the "Imagery"), in all media now existing or invented in the future, on a worldwide basis and in perpetuity. Uses include the display, distribution, publication or other use of the Imagery taken during the Activity. I agree that the Imagery may be (i) used by the Club and its associated companies for any purpose (including but not limited to marketing and/or promotional use) or (ii) provided to a third party for its purposes (including but not limited to marketing and/or promotional use). I understand that my child's full name, if aged under 16, will not be listed in conjunction with the Imagery unless explicit consent is sought.

☐

Grant permission

☐

Deny permission

### E. TRANSPORT AND SUPERVISION

**If transport by the Club is NOT required:** The Arsenal Football Club PLC (the "Club") requires your consent to allow the child named in Section B to travel to/from the venue of the Activity alone.

☐

I consent to the child travelling to/from the venue alone.

☐

I do not consent to the child travelling to/from the venue alone. I agree that I shall be responsible for arranging supervision of the child when travelling to/from the venue.

**If transport by the Club is required:** The Arsenal Football Club PLC (the "Club") requires your consent to allow the Club to transport the child named in Section B during the Activity. Transport includes transportation provided by the Club to and from the Activity (where necessary and appropriate in line with the Club's transport procedures). I, the undersigned, hereby grant or deny permission to the Club, to transport the child named in Section B.

☐

Grant permission

☐

Deny permission

The Arsenal Football Club PLC (the "Club") requires your consent to allow the Club to supervise the child named in Section B during the Activity. Supervision includes being in sight or earshot of a Club employee or worker for the Activity. I, the undersigned, hereby grant or deny permission to the Club, to supervise the child named in Section B.

☐

Grant permission

☐





# Safeguarding Adults at Risk Policy & Procedures

## Appendix 6 (cont.)

### Multi-use consent form



Deny permission

#### F. INDIVIDUAL NEEDS

I, the undersigned, provide the below information in relation to the child named in Section B to assist The Arsenal Football Club PLC with the performance of the Activity, to ensure that the child's individual needs are considered (please circle as appropriate):

Dietary & Allergies	Disability & Access Needs	Provide details here, e.g. times medication must be taken, if help is required to administer medication, additional religious/faith needs and access needs.
Medication	Religious & Cultural Needs	
Any other needs		

#### G. EMERGENCY CONTACT DETAILS

In an emergency, if different from the individual named in Section C above, the following person should be contacted:

Name		
Relationship to child		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		

#### H. MEDICAL

I, the undersigned, acknowledge and fully understand the nature of the Activity and that participation in the Activity may give rise to harm or injury to the child named in Section B. I confirm that the child is physically fit enough to take part in the Activity and that any relevant medical conditions have been declared to the Club.

I agree that the child's participation in the Activity is at their own risk and hereby release the Club, its employees, contractors, agents and all of its associated companies (together, "Arsenal") from all liability, responsibility, costs and damages which arise as a result of the child's participation in the Activity. For the avoidance of doubt, the foregoing does not affect the child's legal rights in the event of personal injury or death arising as a result of the negligence of Arsenal.

If the child sustains any harm or injury due to participation in the Activity, Arsenal may, in its sole discretion, offer to provide such medical treatment as it determines necessary or appropriate (the "Medical Treatment"). I hereby consent to emergency Medical Treatment determined necessary by Arsenal and acknowledge that by allowing any non-emergency Medical Treatment to be performed on the child, I (and the child) will be deemed to have consented to such Medical Treatment. If the child receives any Medical Treatment, emergency or non-emergency, I and the child assume all risk of harm or injury which may result (subject to the immediately preceding paragraph).

#### I. SAFEGUARDING

The Club is committed to safeguarding and protecting children and young people, and adults at risk. Please see the Club's safeguarding policies at [https://www.arsenal.com/sites/default/files/documents/Safeguarding\\_Children\\_and\\_Young\\_1.pdf](https://www.arsenal.com/sites/default/files/documents/Safeguarding_Children_and_Young_1.pdf) and [https://www.arsenal.com/sites/default/files/documents/Safeguarding\\_Adults\\_at\\_Risk\\_0.pdf](https://www.arsenal.com/sites/default/files/documents/Safeguarding_Adults_at_Risk_0.pdf).

#### J. SIGNATURE AND EXPIRY

I, the undersigned, consent to The Arsenal Football Club PLC storing and processing the above referenced personal data in accordance with all relevant data protection laws. You may withdraw this permission at any time. For further details, see the privacy policy at [www.arsenal.com/privacy-policy](http://www.arsenal.com/privacy-policy) or write to the Data Protection Officer, The Arsenal Football Club plc, 75 Drayton Park, London N3 1BU.

Signature of Parent/Legal Guardian/Carer		Date	
Print Name			



# Safeguarding Adults at Risk Policy & Procedures

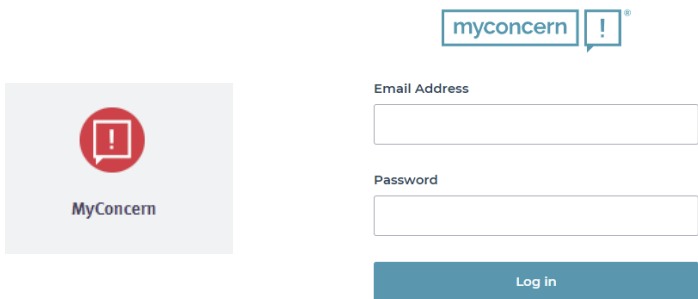
## Appendix 7 – Health & Safety Incident Reporting

Link to log into the Club’s [Accident Management System](#)

Link to log into the Club’s [Health & Safety Flag It System](#)

## Appendix 8 – Safeguarding Reporting

Link to log into [MyConcern](#) to file a Safeguarding Concern



Link to access the Club’s [Safeguarding Concern Form](#) for staff members without access to MyConcern

## Appendix 9

### Mental Capacity

Generally, it is not for the Club, employees, workers, consultants, agency staff or volunteers to make a decision about whether an adult at risk lacks mental capacity in relation to the concern in question, but it is useful to have an understanding of the notion of capacity explained below:

#### Definition

- The ability to make a decision at a particular time. The starting assumption must always be that an adult at risk has the capacity to make a decision, unless it can be established that an adult at risk lacks capacity.
- The term “lacks capacity” means an adult at risk who lacks capacity to make a particular decision or take a particular action for themselves at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves but will have capacity to make other decisions. For example, the adult at risk may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decisions about financial matters.
- It also reflects that an adult at risk who lacks capacity to make a decision at a certain time may be able to make that decision at a later date - this may be due to illness or accident.

### Assessing Capacity

An adult at risk’s capacity must be assessed specifically in terms of his/her capacity to make a particular decision at the time it needs to be made. Anyone assessing another’s capacity to make a decision for the adult at risk should use the two-stage test of capacity:

#### Stage 1

Does the adult at risk have an impairment of the mind or brain, or is there some sort of disturbance affecting the way his/her mind or brain works? It does not matter whether the impairment/disturbance is temporary or permanent.



# Safeguarding Adults at Risk Policy & Procedures

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## Appendix 9 (cont.)

### Stage 2

If so, does that impairment or disturbance mean that adult at risk is unable to make the decision in question at the time it needs to be made?

#### Assessing ability to make a decision

- Does the adult at risk have a general understanding of what decision he/she needs to make and why he/she adult at risk needs to make it?
- Does the adult at risk have a general understanding of the likely consequences of making, or not making, this decision?
- Is the adult at risk able to understand, retain, use and weigh up the information relevant to a decision?
- Can the adult at risk communicate his/her decision (by talking using sign language or any other means)? Would the services of a professional (such as a speech and language therapist) be helpful?

#### Assessing capacity to make more complex or serious decisions

In most instances a Doctor or Social Care professional will have assessed an adult at risk's capacity. Where background information is provided from a partner agency or the adult at risk themselves, the information should be stored confidentially.

An Independent Mental Capacity Advocate (IMCA) should be appointed to assist an adult at risk who is judged to lack capacity and face serious decisions with no other person to be an advocate for the adult at risk.

#### The statutory principles

The Mental Capacity Act 2005 sets out five statutory principles.

1. An adult at risk must be assumed to have capacity unless it is established that he/she lacks capacity;
2. An adult at risk is not to be treated as unable to make a decision unless all practical steps to help him/her to do so have been taken without success;
3. An adult at risk is not to be treated as unable to make a decision merely because he/she makes an unwise decision;
4. An act done, or decision made, for or on behalf of an adult at risk who lacks capacity must be done, or made, in his/her best interests; and
5. Before the act is done, or the decision is made, regard must be had as to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the adult at risk's rights and freedom of action.



# Safeguarding Adults at Risk Policy & Procedures

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## Appendix 10

### Key Safeguarding Contacts

#### The Club

**Head of Safeguarding**

Adam Brown 07701 296 182  
[abrown1@arsenal.co.uk](mailto:abrown1@arsenal.co.uk)

**Safeguarding Manager**

Michael Hagan 07801 988 346  
[mhagan@arsenal.co.uk](mailto:mhagan@arsenal.co.uk)

**Safeguarding Manager**

Laura Munson 07721 720 167  
[lmunson@arsenal.co.uk](mailto:lmunson@arsenal.co.uk)

**Designated Whistleblowing Officers**

Stuart Wisely 07730 695 070  
[swisely@arsenal.co.uk](mailto:swisely@arsenal.co.uk)

Karen Smart 07736 545 364  
[ksmart@arsenal.co.uk](mailto:ksmart@arsenal.co.uk)

**Disability Access Manager**

Jon Dyster 07716 084 306  
[jdyster@arsenal.co.uk](mailto:jdyster@arsenal.co.uk)

#### The Premier League

**Head of Safeguarding**

Jess Addicott 020 7864 9000  
[Safeguarding@premierleague.com](mailto:Safeguarding@premierleague.com)

#### The FA

Safeguarding Team 0800 169 1863  
[Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)

#### The Police

Emergencies 999  
Non-Emergencies 101  
Community Safety United Adult Team 020 7421 0173

#### Islington Victim Support

National Victim Line Islington Office 0845 450 3936  
020 7336 1770  
Prevent [prevent@islington.gov.uk](mailto:prevent@islington.gov.uk)

Islington Social Services Emergency Duty Team 020 7226 0992



# Safeguarding Adults at Risk Policy & Procedures

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## Appendix 10 (cont.)

### Other Agencies

Ann Craft	0115 951 5400 <a href="mailto:Ann-craft-trust@nottingham.ac.uk">Ann-craft-trust@nottingham.ac.uk</a>
NSPCC Helpline for footballers who experienced sexual abuse	0800 023 2642
Refuge – Domestic Abuse Advice and Support for Women	0808 200 0247 <a href="http://www.refuge.org.uk">www.refuge.org.uk</a>
Survivors UK – Sexual Abuse Advice and Support for Men	020 3598 3898 <a href="http://www.survivorsuk.org">www.survivorsuk.org</a>
Respect – Help for Perpetrators of Domestic Abuse	0800 085 3330 <a href="http://www.respect.uk.net">www.respect.uk.net</a>
Actions on Elder Abuse	0808 808 8141 <a href="http://www.wearehourglass.org">www.wearehourglass.org</a>