

# SAFEGUARDING ADULTS AT RISK

POLICY & PROCEDURE

**KEEPING  
YOU SAFE**  
At Cardiff City



# CARDIFF CITY FOOTBALL CLUB SAFEGUARDING ADULTS AT RISK POLICY AND PROCEDURES

## **Prepared by**

Rob Cronick, Head of Safeguarding, Cardiff City FC (June 2023)

## **Approved by**

Cardiff City FC Board (June 2023)

## **Acknowledgement:**

Designated Officer for Safeguarding and Cardiff Local Authority Safeguarding Service Manager (June 2023)

## **Resources:**

The Premier League, The English Football League, The Football Association, The Social Services and Well-being (Wales) Act 2014, Wales Safeguarding Procedures

## **Review date: June 2024**

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

## Version Control Sheet

Version	Date	Author	Status	Comment
V5.0	June 2023	Rob Cronick Head of Safeguarding	<p>Reviewed Safeguarding Policy including:</p> <ul style="list-style-type: none"> <li>• Implementation of Club Safeguarding Strategy 2023-2026</li> <li>• Change of Academy staff details</li> <li>• Amendment to Club safeguarding structure</li> <li>• Amendment to Photography and Images Policy</li> <li>• Changes to Matchday Safeguarding Arrangements</li> <li>• Revision of Club Safer Recruitment Policy</li> <li>• Removal of COVID 19 protocols</li> <li>• Change to Club kit supplier displayed by Bartley Bluebird</li> </ul>	<p>Recommendations from EFL and Barnardo's Audits</p> <p>Recruitment of Player Care and Academy DSO</p> <p>Removal of COVID 19 protocols across Wales by the Welsh Government.</p>

V4.0	January 2021	Rob Cronick Head of Safeguarding	<p>Reviewed Safeguarding Policy including:</p> <ul style="list-style-type: none"> <li>• Reference to vulnerable adults removed and changed to 'adults at risk'.</li> <li>• Reference to the Social Services and Wellbeing Act (Wales) 2014</li> <li>• Reference Working Together 2018</li> <li>• Reference to the Wales Safeguarding Procedures</li> <li>• Update policy to include reference to GDPR</li> <li>• Regional Safeguarding Boards now in place</li> <li>• Reviewed Safeguarding Officers across Club confirmed including appointment of Head of Safeguarding</li> <li>• Version Control Sheet included in policy</li> <li>• Reference to Safeguarding Manager change to Head of Safeguarding</li> <li>• Useful Contact Information updated to reflect new appointments to Club Safeguarding Team and new terminology for Statutory Partners</li> <li>• Reviewed definitions of categories of abuse to include e.g. county lines, radicalisation</li> <li>• References to government documents changed to 2018 editions</li> <li>• New Easy Read Safeguarding Adults at Risk policy added</li> <li>• Reference made to Low Level Concerns Policy</li> </ul>	<p>To reflect feedback from a review by Ann Craft Trust and new appointment of Head of Safeguarding.</p> <p>Recommendations from Barnardo's audit of Cardiff City Football Club on behalf of the Premier League and EFL.</p> <p>Recommendations from EFL Safeguarding Audit</p> <p>Recommendations from Cardiff Designated Officer for Safeguarding</p> <p>Impact on Club Safeguarding as a result of COVID 19</p>
V3.0	July 2017	Helen Kay Safeguarding Manager	Reviewed Safeguarding Vulnerable Adults Policy	Scheduled Review
V2.0	July 2016	Helen Kay Safeguarding Manager	Reviewed Safeguarding Vulnerable Adults Policy	<p>Scheduled Review</p> <p>Change of Corporate brand, Club badge and colour</p> <p>Change from Premier League to EFL</p>
V1.0	April 2014	Helen Kay Safeguarding Manager	Original Safeguarding Vulnerable Adults Policy	Promotion to the Premier League required formal safeguarding policy and procedure. Appointment of Safeguarding Manager

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# 1. FOREWORD

“Cardiff City Football Club is firmly committed to ensuring the safety and well-being of all the individuals and communities with whom we engage, and therefore our aim is for the golden thread of safeguarding to run through every element of the club’s work.

Our new Safeguarding Strategy for 2023 – 2026 focuses on four key areas of SAFETY, POSITIVE EXPERIENCE, and EFFECTIVENESS, all underpinned by strong LEADERSHIP.

This strategy sets out our vision, core principles and strategic direction for safeguarding across all areas of our Club.

Through the application of this policy, we acknowledge our duty of care to safeguard and promote the welfare of children and adults at risk. The Club is committed to ensuring its safeguarding practice reflects its statutory responsibilities, government guidance and compliance with best practice and the requirements of The Football Association, The Football Association of Wales, The English Football League and The Premier League.”

**Ken Choo**

Chief Executive Officer and Senior Safeguarding Lead

“The staff and partners working with and for Cardiff City Football Club will work tirelessly to embed the culture of safeguarding club-wide with a relentless commitment in promoting vigilance.

We will develop and implement effective policy, appropriate reporting procedures and best practice in order to protect all children and adults at risk who attend the Club’s activities.

We will also strive to ensure the Club attracts and employs the correct people through our ‘safer recruitment’ policy to further protect those who participate at, and visit, Cardiff City Football Club.”

**Rob Cronick**

Head of Safeguarding

## 2. POLICY STATEMENT, PRINCIPLES AND AIMS

### Policy Statement

Cardiff City Football Club ('the Club') is committed to safeguarding and protecting adults at risk who engage in Club organised activities.

Safeguarding is about protecting adults from abuse or neglect and educating those around them to recognise the signs and dangers.

The Club will strive to keep adults at risk safe and free from harm at Cardiff City Stadium, in both our Academy and Women and Girls Teams and our Community Foundation.

The Club takes its responsibilities seriously in this area and we are committed to:

- Getting the right people involved through safe recruitment and training.
- Creating a safe environment for all visitors, participants and staff.
- Having and promoting clear systems to deal with any issues or concerns.

The Social Services and Well-being (Wales) Act 2014 introduced a strengthened, robust, and effective partnership approach to safeguarding.

### Principles

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 the Appendices.

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 Procedure are approved by the Designated Officer for Safeguarding and Cardiff Local Authority Safeguarding Service Manager and is compliant with legislation including but not limited to the Care Act 2014, statutory guidance, regional policies such as The Social Services and Well-being (Wales) Act 2014, Wales Safeguarding Procedures and governing body rules and regulations including the English Football League Rules and FA Rules. This Policy and Procedure should be read in conjunction with related Club policies and procedures listed in this document.

One of the most important principles of safeguarding is that it is everyone's responsibility. Each professional and organisation must do everything they can to ensure that adults at risk are protected from abuse.

## Policy Aims

- To develop a safe and welcoming environment for adults at risk involved in Club-led activities ensuring they are free from abuse and the fear of abuse in all its forms;
- To cultivate a culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role they play in keeping adults at risk, themselves and colleagues, safe from harm;
- To promote a clear system that supports constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;
- To apply legislation, government policy and guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with statutory agencies and other partners to promote and safeguard the welfare of adults at risk.

## 3. SCOPE

This policy and procedure relates to safeguarding 'adults at risk' to ensure best practice in safeguarding is promoted and adhered to. All safeguarding concerns regarding 'children' will fall under the Cardiff City Football Club 'Safeguarding Children Policy and Procedure.

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

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

This policy applies to the Cardiff City Football Club Limited and all subsidiary companies and affiliates. It applies to all locations owned and operated by the Club including at locations hired to provide Club activities.

Failure to comply with this policy may be treated as misconduct and be dealt with under our Disciplinary Procedure and if a breach amounts to gross misconduct this may result in dismissal, possibly criminal prosecution and reporting of any incident to the appropriate regulatory or investigative body.

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

All staff: full time, part time, casual, piece worker, consultants and volunteers have the responsibility to report any concerns to the Head of Safeguarding or a member of the Club Safeguarding Team.

The policy will be widely available at all Cardiff City Football Club facilities on request for those without access to the internet.

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

- Cardiff City Stadium including all matchday roles and activities that come into contact with adults at risk
- Cardiff City Superstore
- Cardiff City Training Complex (the Vale)
- Cardiff City Academy (Llanrumney)
- Cardiff City House of Sport (Leckwith)
- Cardiff International Sports Campus (Leckwith)
- All away venues within scope of Academy and Womens and Girls Teams games programmes
- Travel, Events and Supporter Liaison
- Other Club related entities and activities undertaken outside of the UK

## 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.
- 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 2014, Chapter 14*

## 4. RELEVANT LEGISLATION, GUIDANCE AND REGULATIONS

- Achieving Best Evidence 2002
- Care Act 2014
- Care and Support Statutory Guidance 2014
- Counter-Terrorism and Security Act 2015
- EFL 'Guidance for Safer Working Practice'
- EFL 'Managing Safeguarding Concerns' 2023/2024
- EFL Safeguarding Standards 2023/2024
- Equality Act 2010
- FA 'Respect' Codes of Conduct
- Female Genital Mutilation Act 2003
- Forced Marriage Act 2008
- General Data Protection Regulation 2018
- HM Government Information Sharing Guidance for Practitioners 2015
- Human Rights Act 1998
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- Police Act 1997
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Social Services and Well-being (Wales) Act 2014
- Sexual Offences Act 2003
- Wales Safeguarding Procedures

This list is not exhaustive.

## 5. RELATED CARDIFF CITY FOOTBALL CLUB POLICIES

This policy should be read in conjunction with the following Cardiff City Football Club documents:

- Anti-Bullying Policy
- Cardiff City Community Foundation Safeguarding Policies and Procedures
- Cardiff City Safeguarding Strategy 2023-2026
- Data Handling and Protection Policy
- Employee Handbook including Grievance, Disciplinary, Whistleblowing and Equal Opportunities Policies
- Equality Policy
- Event Management Plan
- Health and Safety Policy
- Low Level Concerns Policy
- Matchday Safeguarding Plan
- Safer Recruitment Policy
- Safeguarding Children Policy & Procedure
- Safeguarding Social Media Policy
- Transport Policy
- Trips, Tours and Tournaments Policy

## 6. ROLES AND RESPONSIBILITIES

### Cardiff City Football Club

Cardiff City Football Club believes that children and young people and adults at risk have the right to take part in sport in an environment which is safe and free from any risk of abuse.

We take all reasonable steps to reduce the risk of harm to children and adults at risk involved in Club activities and discharge our moral and legal responsibility to protect them.

### Senior Safeguarding Lead

The Senior Safeguarding Lead for Cardiff City Football Club has leadership responsibility for the Club's safeguarding provision, in consultation with the Club's Head of Safeguarding, and actively champions safeguarding at Board level.

### Head of Safeguarding

The Head of Safeguarding provides strategic leadership on safeguarding provision and issues across Cardiff City Football Club. This includes case management and the development and monitoring of policy and procedure.

### Designated Safeguarding Officers

The Designated Safeguarding Officer (DSO) supports the Club's safeguarding policy, procedures, and systems. The DSO acts as the first point of contact for safeguarding matters for a specific department within the Club and will forward concerns to the Head of Safeguarding.

## **Heads of Department and Senior Staff**

Specific responsibility for safeguarding policy, procedure and systems fall on management and those involved in the recruitment, selection and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment, and safer working practices in their day to day operation.

## **Staff**

The Club's Employee Handbook details the responsibilities of each employee and describes the disciplinary, grievance, equal opportunities and whistle blowing policies.

The Cardiff City Football Club Safeguarding Structure appears on the next page.

For a list of Designated Safeguarding Officers at Cardiff City Football Club and external contacts, please refer to the information contained in the Appendices.

# CARDIFF CITY FOOTBALL CLUB SAFEGUARDING ORGANISATION CHART

**Rob Cronick**  
Head of Safeguarding

**Dawn Williamson**  
Head of HR

## Safeguarding Executives & Directors

Designated Officer for Safeguarding & Cardiff Local Authority Safeguarding



English Football League Executive Office (Safeguarding)



The Football Association Case Management Team



The Football Association of Wales Compliance Department (Safeguarding)



Cardiff City FC Board of Directors incl Senior Safeguarding Lead

## Club Safeguarding Team

**Academy Designated Safeguarding Officer**  
Steve Pearce

**Academy Player Care Manager**  
Sarah Nightingale

**Women & Girls Team**  
Iain Darbyshire

**Disability Access Officer**  
Ben Jones

**Stewarding & Event Manager**  
Tom Nash

**Community Foundation Senior Safeguarding Manager**  
Roxanne Williams

## Safeguarding Officers

Key Areas of Responsibility

- To support the Head of Safeguarding in promoting the moral & legal responsibilities of safeguarding at the Club;
- Day to day management of safeguarding issues;
- Record and refer to the Head of Safeguarding all relevant incidents of poor practice and possible abuse;
- Safer Recruitment
- Identify Staff Safeguarding training needs;
- Support Club-wide safeguarding strategy.

6 Monthly Reviews of Club-wide Safeguarding

## Matchday Safeguarding Roles

### Vulnerable Groups

Disability Access Officer

### Mascots

Fan Experience

### Ball Team

Matchday Co-ordinator

### Flag Bearers

Fan Experience

## 7. 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 staff work in pairs;
- Request written consent if the club are required to transport adults at risk using the appropriate document 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 trips and 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 Safeguarding Concern Report Form (see Appendix);
- Recording safeguarding concerns on the Safeguarding Concern Report Form or the My Concern platform.

This list is not exhaustive.

## 8. UNACCEPTABLE PRACTICE

The following are examples that are regarded as poor 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 an adult at risk;
- Taking an adult at risk alone in a car or journey unless written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking an adult at risk to your home or places 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;
- Using or allowing to be used, inappropriate language towards or in the presence of an adult at risk;
- Allowing an adult 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 an adult at risk can do for themselves.
- Not recording safeguarding concerns on the Safeguarding Incident Form or 'My Concern' application;
- Sending inappropriate text messages or social media messages to an adult at risk;
- Having an adult at risk engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram; and
- Engaging with an adult at risk on 'one to one' personal electronic communications.

This list is not exhaustive.

## 9. STAFF/ADULT AT RISK RELATIONSHIPS

The Club provide advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with Adults at Risk. Staff found in breach of these rules or the Staff Code of Conduct may be subject to disciplinary action and/or a safeguarding investigation.

- Staff should ensure they maintain healthy, positive, and professional relationships with all Adults at Risk.
- Staff working with Adults at Risk are in a 'position of trust' in relation to them. Club personnel must not engage in any personal relationship with an Adult at Risk whilst that unequal power relationship exists.
- The Club disapproves of relationships between personnel and Adults at Risk for whom they have previously been responsible.

### Abuse of Position of Trust

All staff are aware that inappropriate behaviour towards Adult at Risk is unacceptable and is likely to be unlawful. At all times, their conduct towards Adult at Risk must be professional.

The Club's Employee Handbook sets out this expectation on staff.

### Advice for anyone concerned about the possible abuse of a position of trust

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you should report this to the Designated Safeguarding Officer or the Head of Safeguarding using the contact details listed in the Appendix of this document. If these channels have been followed and you still have concerns, or if the matter relates to a member of the Safeguarding Team or Club Head of Safeguarding please contact:

The **Safeguarding Manager** at the **EFL** on **01772 325940** or email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

**Cardiff Adult Safeguarding Team** on **02920 338439** (out of hours **02920 788570**)

**South Wales Police** on **101**

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken.

Alternatively, you can seek advice from our statutory partners listed in the Appendix.

# PROCEDURES

## 10. THE 6 PRINCIPLES OF ADULT SAFEGUARDING

**The Care Act** sets out principles that should underpin safeguarding of adults in all aspects of society, including sport and activity organisations.

### 1. Empowerment

People being supported and encouraged to make their own decisions and informed consent.

**You should:**

- Talk to the adult if there are concerns –ask them what they want to happen
- Give people choice and control over decisions – get consent wherever possible for any safeguarding referrals. Only the adult themselves can consent.

**What does this mean for the adult?**

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

'Making Safeguarding Personal' means that adults should be at the centre of safeguarding - their views, wishes, feelings and beliefs must be taken into account when decisions are made.

### 2. Prevention

It is better to take action before harm occurs.

**You should:**

- Create a culture that means participants feel able to discuss issues and know where to go if they have a concern
- Make sure clear, simple and accessible information is available about abuse and where to go for help
- Train staff in adult safeguarding
- Ensure committee members, coaches and especially welfare officers read this guidance, so they know the basics

**What does this mean for the adult?**

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

### 3. Proportionality

The least intrusive response appropriate to the risk presented.

**You should:**

- When dealing with abuse situations, think about the risk.
- Make responses appropriate to the risk presented.
- Respect the person, think about what is best for them and only get involved as much as needed.

**What does this mean for the adult?**

"I am sure that the professionals will work in my interest, as I see them, and they will only get involved as much as needed."

### 4. Protection

Support and representation for those in greatest need.

**You should:**

- Know what to do if there are concerns
- Know how to stop any abuse
- Know how to offer help and support for people who are at risk
- Encourage all personnel to do safeguarding adults training
- Identify who needs more in-depth training

**What does this mean for the adult?**

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

### 5. Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

**You should:**

- Work in partnership with each other and local communities.
- Play a part in preventing, detecting and reporting abuse.
- Have a stand-alone safeguarding adults policy and procedures that includes details of the Local Safeguarding Adults Board and Adult Social Care team
- Ensure that everyone knows about the policy and procedures

**What does this mean for the adult?**

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

## 6. Accountability

Accountability and transparency in delivering safeguarding.

### You should:

- Understand that safeguarding adults is everybody's business.
- Everyone must accept that we are all accountable as individuals and clubs
- Roles and responsibilities must be clear so that people can see and check how safeguarding is done

### What does this mean for the adult?

"I understand the role of everyone involved in my life and so do they."

## Capacity – Making Decisions

We make decisions every day, often without even realising, and may take this for granted. Some people can make every decision about their own lives. Some people can make some decisions and a small number of people cannot make any decisions. Being unable to make a decision is called "lacking capacity".

The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides the framework for this to happen.

In sport and activity, you do not have to be an expert in assessing capacity but try to follow the 5 principles:

1. Assume that people can make decisions, unless it is proven that they cannot – if you have concerns about a person's level of understanding attending one of your events you should check this with them and if applicable people supporting them.
2. Give people as much support as they need to make decisions - you may be involved in this, you might need to think about the way you communicate or provide information, you may be asked your opinion.
3. The right to make unwise decisions if you understand the implications – a person may want to play a contact sport even though they are unsteady on their feet. If they understand the implications then consider how risks can be minimised so they do not miss out, for example by using protective sports equipment.
4. Best Interests - If someone is not able to make a decision, then the people helping them must only make decisions in their 'best interests'. This means that the decision must be what is best for the person, not for anyone else. If someone was making a decision on your behalf, you would want it to reflect the decision you would make if you were able to.
5. If someone is having a decision made for them, then find the least restrictive way of doing what needs to be done.

## Consent

If you have concerns about an adult, you have a duty to report these to the Designated Safeguarding Officer or Head of Safeguarding. You do not need consent to discuss a concern with your safeguarding officer. Thinking about making safeguarding personal, it is good practice to have a conversation with the adult and inform them you are concerned and will pass this onto the safeguarding officer. If the concern needs to be referred to Adult Social Care this is when consent from the adult will be obtained. However, you can get advice from Social Care without giving details, do not let the issue of consent get in the way of getting advice.

# 11. SAFER RECRUITMENT

## 1. Aims and objectives

The recruitment and selection decision is of prime importance as the vehicle of obtaining the best possible person-to-job fit which will, when aggregated, contribute significantly towards Cardiff City Football Club Limited's ("the Company's") effectiveness. It is also important, as the Company evolves and changes, that new recruits show a willingness to learn, adapt and ability to work as part of a team. The Recruitment & Selection policy and procedure is designed to assist in meeting these objectives, and in addition, to ensure that any recruitment and selection is:

- Fair and consistent;
- non-discriminatory on the grounds of sex, race, age, religion or disability;
- conforms to statutory regulations and agreed best practice.
- As part of the Club's recruitment and selection process, offers of work to positions which involve working with children are subject to 'Safer Recruitment' principles. This principle will be evident in the publishing and circulation of any recruitment advert.

## 2. Job vacancies

2.1 Prior to embarking on any recruitment or selection, the job vacancy (including casual and permanent vacancies) under consideration must be clearly defined. In defining the vacancy a Head of Department must:

- identify whether a vacancy has arisen in an existing post, and if so whether an exact replacement is required or whether there is an opportunity to revise the requirements, or whether there is a new post;
- prepare/update a job description for the vacancy which should include statements on safeguarding and equality
- recommend the appropriate terms and conditions, including pay rates or salary band, and other benefits.

2.2 The above details must be provided to the HR department and authorised by the Chief Executive Officer prior to commencing any recruitment activity.

## 3. Recruitment

3.1 Prior to commencing recruitment activity an appointing Head of Department must agree with the Head of Human Resources the most effective means of obtaining suitable candidates. The following options may be used:

- internal advert within the Club;
- examination of previous applications, or those held on file within the HR department;
- external advert with UK Sport
- external advert with EFL
- external advert with LinkedIn (if authorised in advance)
- external advert in the local press;
- external advert in the National press;
- external advert in the appropriate technical/professional bodies; and
- in senior posts, the use of a recruitment agency (if authorised in advance)

3.2 It is the Company's policy to advertise opportunities internally wherever possible, and appropriate notices should be posted on internal notice boards at all locations which may have individuals working with the necessary skills or experience to fulfil the vacant post. The advert will also be emailed internally to all staff who have access to email. The period before which external recruitment will commence should be determined before any internal advert is posted. The Company reserves the right to consider the impact of the loss of an individual on any given site/location as part of the process of assessing applications.

3.3 Any advertisements placed should contain as much information as possible to ensure the

correct recruitment group is targeted and reduce unsuitable application, whilst remaining as cost-effective as possible. As such any advertisement should give an indication of the terms and conditions applicable to the job, although precise details need not be included.

3.4 External adverts must be submitted to the Head of Human Resources for approval and authorised by the Chief Executive Officer before being placed.

#### 4. Selection

4.1 Appropriate selection procedures must be used for each post. Procedures may vary dependent on the vacancy and, at their simplest, procedures may involve a straight forward interview or skills testing. For more senior posts, presentations to the interview panel on a chosen topic and/or a series of individual interviews on various topics may be included. The appointing Head of Department will approach relevant people to assist with short listing and interviewing. Normally, at least two people should be involved in short listing and/or sit on the Interview Panel. The Head of Human Resources must be included in all final interviews for permanent staff where possible. The appointing Head of Department must be included for all interviews for casual staff where possible. The Chief Executive Officer must be included when recruiting senior members of staff. As a minimum, a job description/individual specification must be used to develop selection criteria table for use during the selection process. Different selection criteria tables may be used for each stage of the selection process, if appropriate. 4.2 A clear timetable and allocation of responsibilities must be agreed between the appointing Head of Department and Head of Human Resources for administering the selection process prior to its commencement including:

- placement of advertisements and closing dates for applications;
- receipt and collation of applications/CV'S;
- invitations to candidates for interview, include the following documentation:-

1. the completed self declaration form in a sealed envelope (if applicable)
2. right to work in the UK e.g original passport etc.
3. original DBS (if applicable)

- timetabling the interviews;
- obtaining two references when the position has been offered and accepted; and
- informing successful and unsuccessful candidates.

4.3 Any application forms/CV's received after the agreed closing date must be disregarded unless otherwise agreed by the Head of Human Resources.

4.4 Each candidate shortlisted for interview, will be informed that an open source online search will be conducted ahead of interview, in line with the recommendations from 'Keeping Children Safe in Education 2023'.

4.5 Applicants must be assessed against the selection criteria tables, and the appointing Head of Department must record in writing the reasons why an applicant has not been shortlisted for interview or rejected following the interview.

4.6 At the interview, the appointing Head of Department will ensure that at least 3 panel members will be present (if possible) one of whom should be safer recruitment trained. All Heads of Department must be trained in Safer Recruitment. An Interview Report Form is completed as fully as possible – an example of a possible format for the Interview Report Form is included in Appendix 1 although this should be adapted to meet the circumstances of each vacancy. When interviewing, staff will ensure that Equal Opportunities legislation is strictly adhered to, with no discrimination shown on the grounds of sex, religion, age, disability, ethnic origin or sexual orientation.

A copy of the interview questions should be emailed to the Head of HR before the interview takes place and should include value based questions under the headings of Compassion, collaboration, innovation. Responsibility, diversity, integrity, quality and trust. Please speak to HR if you need guidance on the interview questions.

Any gaps in employment should be explored during the interview process.

4.6 All papers for all candidates both successful or unsuccessful, be they from the application or interview stage, must be returned to the Head of Human Resources, for confidential filing/destruction.

4.7 When all candidates have been interviewed, the panel will decide on the best person for the post. The envelope containing the self declaration from the successful candidate may now be opened and the contents reviewed. The appointing manager will arrange to inform the

successful candidate as soon as possible, identifying a commencement date and confirming the terms and conditions of employment including starting salary and any other benefits. This may initially be done verbally but must be confirmed in writing. In both cases it must be noted that the post is offered subject to the provision of satisfactory references and up to date DBS certificate if applicable for that role.

4.8 References must be obtained as soon as practicable following the offer of the post, and the impact of the results must be considered and communicated to the candidate immediately thereafter by the appointing manager. The Human Resources Department will be responsible for obtaining the references for all permanent employees and the appointing Head of Department will be responsible for obtaining references for all casual workers. The appointing Head of Department should email a copy of the reference to the Human Resources Department for recording and file as and when they have been received.

4.9 All papers for the successful candidate, including references must be sent to the HR department for confidential filing within the individual's personnel file, whilst the HR department will arrange for the issue of a contract of employment incorporating the agreed terms and conditions.

## **5. Safer Recruitment of External Candidates**

- Completion of an application form which includes their employment history and an explanation for any gaps in that history;
- An interview, if shortlisted;
- Provision of two referees, including at least one who can comment on the applicant's suitability for the role and suitability to work with children if applicable for the role. One reference must be from their most recent employer;
- Provision of evidence of identity and qualifications;
- If an offer of employment is made, the applicant is to be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an Enhanced Level DBS check and a child barring list check for those engaged in 'Regulated Activity'. The certification will expire after 3 years. If applicable for the role.
- An applicant will be required to complete the Club's Self Declaration Form prior to their commencement of employment and are required to inform the Club if their circumstances have changed that will affect their DBS status. All staff involved in regulated activity will complete this form annually.
- If an offer of employment is made, provision of evidence of the applicant's right to work in the UK will be required.
- On appointment the applicant's details will be uploaded to the Staff 'Single Central Record' by the Head of Safeguarding.

## **6. Safer Recruitment of Internal Candidates**

The above process for the safer recruitment of external candidates will be followed. However, in relation to the provision of references the following two strand process will be adopted:

### Same Discipline Recruitment

There will be no requirement for internal candidates to provide references in this strand of the process. Any adverse conduct or comment will be collated from the annual appraisal process.

### Change of Discipline Recruitment

If there is a distinct change of role, a reference will be provided by the candidates line manager to provide information relating to the candidates suitability for the vacant role.

## 'Regulated Activity'

Regulated Activity is a legal phrase used to describe specific circumstances where individuals are working or volunteering with children or adults who are at risk because of help or treatment they are receiving.

The definition of Regulated Activity is different for children and adults.

For adults, the type of activity that is classed as Regulated Activity is clearly set out in government guidance. Unless individuals are undertaking these activities, your organisation should not request an enhanced DBS check.

The definition of Regulated Activity focuses on the type of activity and contact an individual may have with an adult at risk. Unlike the definition of Regulated Activity with children, the definition for adults does not stipulate a frequency requirement. For adults at risk, the activity alone means an individual is in Regulated Activity, and one instance is enough to qualify.

### Types of Regulated Activity

Within the legal framework, an individual is defined as being in Regulated Activity with adults at risk if any one of the following six conditions is met:

- 1. The individual is in contact with the person by providing healthcare.** This only includes first aid when it is provided on behalf of an organisation dedicated to providing first aid, such as St. John's Ambulance Service.
- 2. The individual is in contact with a person by providing personal care.** This can include physical assistance with eating, drinking, going to the toilet, washing, bathing, dressing, oral care, or care of the skin, hair, or nails because of the adult's age, illness, or disability.
- 3. The individual is in contact with the person in providing social work.**

**4. The individual is in contact with the person in assisting with general household matters.**

Examples including managing the person's cash, paying the person's bills, or shopping on their behalf.

**5. The individual is in contact with the person in assisting in the conduct of their affairs.**

This can be as a result of:

- A.** Lasting power of attorney under the Mental Capacity Act 2005
- B.** Enduring power of attorney within the meaning of the Mental Capacity Act 2005
- C.** Being appointed as the adult's deputy under the Mental Capacity Act 2005
- D.** Being an Independent Mental Health Advocate
- E.** Being an Independent Mental Capacity Advocate

**6. The individual is in contact with the person in conveying.**

Any drivers and any assistants are in Regulated Activity if they transport an adult because of their age, illness or disability to or from places where they have received, or will be receiving, health care, relevant personal care, or relevant social work. However, "conveying" does not include licensed taxi drivers or licensed private hire drivers, and it does not include trips taken for purposes other than to receive health care, personal care, or social work. Pleasure trips, for example, are excluded.

## **Staff 'Single Central Record'**

The Head of Safeguarding maintains a register of all staff working with adults at risk in regulated activity. This register complies with Standard 3.4 of the EFL Safeguarding Standards.

## **Volunteers**

Volunteers will undergo checks commensurate with their work at the Club and contact with adults at risk. Under no circumstances will a volunteer, who has not been appropriately checked, be left unsupervised or be allowed to engage in 'regulated activity'. Volunteers who only work in a supervised capacity, and are not in 'regulated activity', will undergo 'safer recruitment' and DBS checks appropriate to their role.

All requests for DBS clearances are routed via GBG Online Disclosures who are an umbrella body registered with the DBS. All offers of work are subject to the outcome of the screening process and until such time as a satisfactory disclosure certificate has been received and produced, the member of staff will not commence employment.

## **Positive Disclosures**

Should an individual's DBS Disclosure reveal any relevant convictions (in line with the latest legislation Protection of Freedoms Act 2012), 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 will be carried out by the Head of Safeguarding with the Head of Human Resources, along with the relevant Head of Department, to risk assess the information contained within the disclosure certificate. The applicant may also be asked to attend an interview prior to a recruitment decision being made.

# 12. SAFEGUARDING REPORTING PROCESS

## Stage 1

**What to do if you have a concern or someone raises concerns with you.**

- It is not your responsibility to decide whether or not an adult has been abused. It is however everyone's responsibility to respond to and report concerns.
- If you are concerned someone is in immediate danger, contact the police on **999** straight away. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the relevant **Safeguarding Officer** or **Head of Safeguarding**. If they are implicated report it to the **Safeguarding Manager** at the **EFL** on **01772 325940** or **Cardiff Adult Safeguarding Team** on **02920 330888** (out of hours **02920 788570**).
- When raising your concern with the relevant Safeguarding Officer or Head of Safeguarding remember to involve the person. It is good practice to seek the adult's views on what they would like to happen next and to inform the adult you will be passing on your concern.

**It is important when considering your concern that you also ensure that keep the person informed about any decisions and action taken about them and always consider their needs and wishes.**

## Stage 2

**How to respond to a concern**

- Refer to the Safeguarding Adults at Risk Flowchart (see appendix)
- Make a note of what the person has said using his or her own words as soon as practicable. Complete a Safeguarding Concern Report Form (See appendix) and submit to the relevant **Safeguarding Officer** or **Head of Safeguarding** within 24 hours using email: [safeguarding@cardiffcityfc.co.uk](mailto:safeguarding@cardiffcityfc.co.uk)
- All staff trained in the use of the MyConcern online platform must record a concern which will automatically inform the Head of Safeguarding.
- Remember to keep the adult at the centre of the safeguarding process. Discuss your safeguarding concerns with the adult, obtain their view of what they would like to happen, but inform them it is your duty to pass on your concerns to a safeguarding officer.
- Describe the circumstances in which the disclosure or concern came about.
- Take care to distinguish between fact, observation, allegation, and opinion. It is important that the information you have is accurate.
- Be mindful of the need to be confidential at all times, this information must only be shared with the Head of Safeguarding and others on a need to know basis.
- If the matter is urgent and relates to the immediate safety of an adult at risk please contact the Police on 999.

**The information needed:**

Immediate notes should include:

- Who are you? What is your role? How can the Head of Safeguarding contact you?
- Date and Time of incident
- Place and context of disclosure or concern

- Important facts provided, e.g. full names and details of those involved
- What is the current position regarding those involved? What action has been taken?
- Who knows what information? Who informed them?
- Any known views of the adult regarding how they wish the matter to be dealt with?

## The role of the Safeguarding Officer/Head of Safeguarding

For the management of an adult's concern, the Safeguarding Officer or Head of Safeguarding must be consulted.

The Safeguarding Officer/Head of Safeguarding should:

- Directly manage and support the staff involved in the situation.
- Ensure that the action taken is effective in providing immediate and ongoing support to the adult.
- In the case of a Safeguarding Officer, report the incident to the Head of Safeguarding.
- Liaise with the Safeguarding Adults Team to ensure that the procedures are being followed correctly and to make a referral if necessary
- Where an allegation is made against a member of staff or a volunteer at Cardiff City Football Club, the Head of Safeguarding will liaise with the Head of HR to discuss any disciplinary procedures.
- The Head of HR will take responsibility for ensuring that the appropriate support is offered to any person against whom allegations are made.

## Stage 3

### What happens next?

All concerns are to be followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Head of Safeguarding within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the following agencies:

The **Safeguarding Manager** at the **EFL** on **01772 325940** or **email: [safeguarding@efl.com](mailto:safeguarding@efl.com)**

**Cardiff Adult Safeguarding Team** on **02922 330888** (out of hours **02920 788570**)

NOTE: A disclosure is not the only way that you may be made aware of an issue. An adult at risk may inform you of a concern or a possible abusive situation. There may be an instance when a member of staff has witnessed an incident that may cause concern or be made aware of a concern by a third party. It is important to stress that the same process is to be followed.

### Record keeping and Confidentiality

The Club will record all incidents and concerns using the Safeguarding Concern Reporting Form (see Appendix) or recording the information directly to the online reporting platform 'My Concern'. All such reports will be taken seriously, carefully recorded, acted upon where appropriate and confidentially retained. The Head of Safeguarding will regularly review reported concerns in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with General Data Protection Regulations notwithstanding the Club's obligations to information share with statutory partners and football authorities.

# 13. COMPLAINTS PROCEDURE AND WHISTLEBLOWING

## Complaints Procedure

Cardiff City Football Club welcomes information from participants, parents and carers in order to improve the overall experience in every area of the Club's activities. This complaints procedure highlights the responsibility of staff at the Club to respond to complaints within three working days of receipt. If a complaint requires additional investigation, the reporting person will be notified of this. All correspondence received is passed to the Head of Human Resources to assess the nature and the extent of each matter before being passed to the relevant Head of Department and in respect of a safeguarding complaint, to the Head of Safeguarding, in order for the appropriate action to take place.

The complaints procedure is monitored by appropriately trained staff from the Club's Fan Engagement Team.

Complaints can be made via the following contact lines:

Email: [club@cardiffcityfc.co.uk](mailto:club@cardiffcityfc.co.uk)

Telephone: **033 33 11 1927**

Post: **Cardiff City Football Club, Cardiff City Stadium, Leckwith Road, Cardiff, CF11 8AZ**

The vast majority of supporter and customer complaints are successfully concluded by the Club. However, if a supporter is not completely satisfied with the outcome of their complaint, they should refer the matter directly to The Independent Football Ombudsman (IFO). Complaints should be made in writing and emailed to: [contact@theifo.co.uk](mailto:contact@theifo.co.uk). Complaints may be submitted by post to: The Independent Football Ombudsman, Suite 33, Great George Street, Leeds, LS1 3AJ or by telephone (voicemail) on 0800 588 4066. Further information can be found at their website: 'theifo.co.uk'.

## Whistleblowing

The Club views the reporting of concerns by members of its workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy or protocol have been breached by another member of staff.

These reports should be made to the Head of Department who will make every effort to retain confidentiality.

If your concerns relate to the Head of Department, they should be reported to the **Head of HR** by email: [hr@cardiffcityfc.co.uk](mailto:hr@cardiffcityfc.co.uk).

The Whistle Blowing Policy is contained within the Club Employee Handbook.

In respect of any safeguarding concerns the afore mentioned reporting process and the 'Reporting a Concern Flowchart' should be followed.

## 14. LOW LEVEL CONCERNS

Cardiff City Football Club believes every child, young person and adult at risk who participates our activities should be able to take part in an enjoyable and safe environment and be protected from abuse. This is the responsibility of everyone involved in Club activities. Cardiff City Football Club recognises its responsibility to safeguard the welfare of all children, young people, and adults at risk by seeking to protect them from all forms of neglect and abuse.

Cardiff City Football Club recognises that a critical step to safeguarding is to ensure that all those who work with children, young people and adults at risk in our sport, behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

Cardiff City Football Club aims to create and embed a culture of transparency and confidence within our Club to enable all concerns about an adult's behaviour (including those below the referral threshold) that are below the expected standards and values of our organisation and does not meet the organisational expectations encapsulated within our Safeguarding Policies and Procedures, can be shared responsibly, with the right person, enabling them to be dealt with promptly and appropriately.

The aim of Cardiff City Football Club's Low-Level Concerns Policy is to support a culture that enables staff to feel confident to report any concern, no matter how small a concern.

The full policy can be provided on request from the Head of Safeguarding.

## 15. MANAGING ALLEGATIONS AGAINST STAFF

It is important that all allegations made against staff must be reported immediately to the Head of Safeguarding and who will refer the matter to the Head of HR and the Cardiff Adult Safeguarding Team. This policy is to be cross referenced to the Club Employee Handbook.

The Affiliated Football Bodies process will be followed, and any referral is to be made within 24 hours.

When an allegation is made against a member of staff, set procedures must be followed.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and adult at risk are protected. In the event of suspension, the Club will provide support and a named contact for the member of staff.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Subject to restrictions on the information that can be shared, the Head of Department should, as soon as possible, inform the member of staff about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the Disclosure and Barring Service or regulatory body).

The member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be offered appropriate sources of support;
- Be kept informed, at agreed times, of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- If suspended, be kept up to date about events in the workplace.

## Non-Recent Allegations

All allegations concerning staff who are no longer employed at the Club, or allegations of non-recent abuse or poor practice must be reported to the Head of Safeguarding who will refer the matter to the Cardiff Adult Safeguarding Team and the Police if necessary. This process is to be adopted even if it is established that the alleged perpetrator of the abuse/poor practice is deceased.

# 16. 'MYCONCERN' ONLINE REPORTING PLATFORM

The MyConcern safeguarding software is an electronic recording system which enables members of staff in educational and sport establishments or other trusted users to record and update safeguarding concerns. The system allows Designated Safeguarding Leads such as the Head of Safeguarding and Designated Safeguarding Officers to case manage incidents, produce data reports and access all relevant data for their establishment.

The Club holds a stand-alone policy which sets out advice and guidance on the use of the system in an educational and sport setting and complies with the statutory guidance 'Social Services and Well-being (Wales) Act 2014' and 'Keeping Learners Safe 2023' and the EFL Safeguarding Standards.

All full-time staff in 'regulated activity' will be trained in its use as 'trusted users'.

# 17. STAFF TRAINING

It is important that staff receive training and awareness to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will attend a Club induction which includes familiarisation with the Club's safeguarding policy and safer working practices, reporting and recording arrangements, and details for their Designated Safeguarding Officer(s) and the Head of Safeguarding.

Staff should be aware of systems within the Club which support safeguarding.

This includes:

- the Club's Safeguarding Adults at Risk Policy and Procedures.
- **Safer Working Practice.**
- The details of the **Head of Safeguarding** and the team of **Designated Safeguarding Officers.**

All staff members should also receive appropriate information which is regularly updated. The minimum being:

For staff working with Adults at Risk in Regulated Activity:

- The recommended Ann Craft Trust Safeguarding Adults in Sport training (or equivalent) every three years

For other staff working with adults at risk in a position of authority and trust:

- Appropriate safeguarding information and/or training annually.

For all other staff:

- Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.

## New Staff

All new members of staff will undergo an induction that includes familiarisation with the Club's Safeguarding Adults at Risk policy and safe working practices on their activities, as well as identification of their safeguarding training needs. They will be required to sign the Safer Working Practices Guide. We will also work with participants and parents/carers to raise awareness of safeguarding issues that may affect them.

## Supply staff and other visiting staff working with Adults at Risk

Workers in this group will be given a "Safer Working Practice" booklet. All staff will be made aware of the increased vulnerability and risk of abuse of adults at risk.

Visitors with a professional role, such as social worker or members of the Police will have been vetted by their own organisation. Any professionals visiting the Club should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the Club can also contact the relevant organisation to verify the visitor's identity.

# 18. PREVENT

The Prevent Agenda was set up as part of the Governments wider counter-terrorism strategy called CONTEST.

It is a UK-wide strategy that aims to stop people becoming terrorists or supporting terrorism.

The strategy's three objectives are:

- To challenge the ideology that supports terrorism.
- To protect vulnerable people.
- To support sectors and institutions where there are risks of radicalisation.

Cardiff City Football Club has a legal duty to prevent those participating in a learning environment from being drawn into extremism and radicalisation. The Club, in conjunction with its education providers and statutory partners, conducts an annual Prevent Self-Assessment and Action Plan. This supports the Club's commitment to its Equality Policy and overarching duty to protect all persons involved in Club activities as staff, volunteers or participants.

## What is 'Radicalisation'?

Radicalisation is a term that refers to a process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity.

Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - often by a third party who have their own agenda.

## **What is Extremism?**

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.

## **What are British Values?**

### **Democracy**

Over 18-year olds can vote in local and general elections.

### **The Rule of Law**

We understand the importance in having laws which protect us and know the consequences of breaking laws and rules.

### **Tolerance of those of different faiths and beliefs**

We are part of a culturally diverse society

### **Individual liberty**

We have the freedom to make choices about leisure activities we take part in

### **Mutual Respect**

We treat each other with respect.

## **What makes someone at risk of radicalisation?**

The following factors have been identified as increasing an individual's risk of radicalisation:

- Struggling with a sense of identity.
- Questioning their place in society.
- Family issues.
- Experiencing a traumatic event.
- Experiencing discrimination.
- Difficulty in interacting socially and lacking empathy.
- Difficulty in understanding the consequences of their actions.
- Low self-esteem.

## How to Spot the Signs of Radicalisation

There is no single pathway towards radicalisation – it is usually a combination of behaviours that are different to each person, according to their personal vulnerabilities.

The following behaviours could be an indication that an individual is becoming radicalised:

- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us vs. them' manner about others who have alternative beliefs,
- Increasingly secretive or unwilling to discuss views.
- Using derogatory language.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.
- Secretive about who they talk to online and which websites they visit.

## Reporting Terrorism and Suspected Radicalisation

If you suspect someone is involved in terrorism in any way or that someone has been radicalised, you can call the police on **101**. You can remain anonymous throughout this process.

If a Prevent concern is identified in relation to an adult, a referral via the All Wales Prevent Referral Form should be submitted into the Welsh Extremism & Counter Terrorism Unit (WECTU). Please see the below links.

<https://digitalservices.south-wales.police.uk/en/all-wales-prevent-partners-referral-form-english/>

<https://digitalservices.south-wales.police.uk/cy/all-wales-prevent-partners-referral-form-welsh/>

If an individual presents with additional care and support this referral should be accompanied by a referral into Adult Safeguarding via email to: [safeguardingadults@cardiff.gov.uk](mailto:safeguardingadults@cardiff.gov.uk) or telephone **02922 330888**. If you wish to discuss your concerns with a Club member of staff, please contact the **Head of Safeguarding** on **07872 147351** or email at: [safeguarding@cardiffcityfc.co.uk](mailto:safeguarding@cardiffcityfc.co.uk)

You can report online material that promotes terrorism or extremism on the GOV.UK website <https://www.gov.uk/report-terrorism>

Alternatively, you can call the **Anti-Terrorist Hotline** anonymously on **0800 789 321**.

# 19. PHOTOGRAPHY AND IMAGES

During the course of our activities it is foreseeable that a child or adult at risk's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club staff and contractors in both internal and external news and marketing publications and on-line via websites and social media.

## Video or Photographs as a Coaching or Management Aid

The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types are covered by data protection law. As such all those responsible for the recording of this footage must:

- Adhere to this policy;
- Take responsibility for the safe storage and distribution of the images;
- Give due consideration to the dignity and protection of the players involved; and
- Inform parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

## Consent

Where an activity may allow for the capture, and thus use, of a participant's image, the person responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent or participant consent in respect of an adult at risk and ensure that those individuals understand what they are consenting to and why. Consent must provide a genuine choice to be valid.

## Legitimate Interest

When images are taken for identification or coaching purposes, consent is not normally the appropriate condition for capturing and using such images in this way. Parents/carers/guardians of children and adults at risk must be aware that images are being used in this way. Should there be any issues arising out of images being processed for the Club's legitimate interests they may contact our **Data Protection Officer** on email: [dpo@cardiffcityfc.co.uk](mailto:dpo@cardiffcityfc.co.uk). Details of all processing activities are documented in the Club's privacy notices available from the Club website.

## Opt Out

Other than on match / public event days (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed or object to their image being used as part of a legitimate interest. The workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with guardianship or parental responsibility for the individual and must uphold the dignity of the participant opting out.

## Storage

All images, whilst held by the Club, will be securely stored on the Club's IT systems and remain the property of the Club at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club's management staff. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

## Match Day, Public Events, Incidental Image Capture & Consent

Large crowds may create further questions with consent and image use. At events such as matches, concerts and special public events, explicit consent is not required as there is a reasonable expectation that any person attending may have their image captured or broadcast. In any situations where adults at risk may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that an image of an adult at risk has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

## Matchday photography

Adults at Risk attend games as spectators and may appear as part of the crowd on matchdays and be reproduced in official Cardiff City Football Club promotional material and appear in the public domain. The Club's terms and conditions of ticket purchase and standard ground regulations state that images may be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring an adult at risk should be addressed to the **Head of Safeguarding** who can be contacted by email: [safeguarding@cardiffcityfc.co.uk](mailto:safeguarding@cardiffcityfc.co.uk)

The Club accepts no liability for non-Cardiff City images and reserves the right to prohibit the use of any photography, video or film on its activities or premises. This includes match days.

# 20. SOCIAL MEDIA AND E-SAFETY

All members of society increasingly use electronic equipment daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, Snapchat and Instagram.

Unfortunately, some perpetrators will use these technologies to harm children and adults at risk. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children and adults at risk to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Children and adults at risk may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

The Club's Safeguarding and Social Media Policy explains the professional boundaries expected between staff, adults at risk and their parents/carers.

## Cyberbullying

Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities.

The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

## Staff Communication

Any communication using ICT (Information Communication Technology) by staff should be carried out using Club IT, e.g. mobile phone and Club email address. This ensures that Club policies, firewall/filters and security apply.

It is important for staff to maintain professional and personal boundaries in and out of work:

- Staff should not have direct personal communication with adults at risk from Club activities using ICT, e.g. email, mobiles (unless an approved arrangement is in place).
- On all social media, any requests from adults at risk or their parents/carers should be rejected.
- Concerns arising from contact on social media from adults at risk should be directed to a Safeguarding Officer or the Head of Safeguarding. This will help to avoid blurring boundaries between personal and professional life.
- Staff should take care on how they present themselves in the public domain (e.g. internet, media) and their association with Cardiff City Football Club.
- Staff should use a disclaimer on social media with wording such as 'these views are my own views and not those of the Club'.
- Staff should direct any queries/clarification on this to the Head of Communications or the Head of Safeguarding.

As a general policy, communication with adults at risk is via the Club through the parent/carer or school/college/organisation. However, the Club recognises that direct communication with adults at risk may be required on certain activities for professional and welfare purposes and in such circumstances the Designated Safeguarding Officer and Head of Safeguarding should be consulted, and protocols put in place and appropriate consent obtained from the parent/carer.

**Filtering:** Cardiff City Football Club has an appropriate filtering system that manages the following content: discrimination; drugs/substance; extremism; malware hacking; pornography; piracy and copyright; self-harm; violence and gambling. This includes the Academy setting at all sites and the WIFI settings for Academy visitors (including parents/carers and children). Cardiff City Stadium does not allow public access to its WIFI system however offers the same protection to its users during Club or Private use of its network. The system meets the expectations laid out in the Club's Information Security Policy. All online concerns are to be reported to the Designated Safeguarding Officer for the department or the activity lead.

## 21. MATCHDAY PROCEDURES

Cardiff City Football Club works tirelessly to provide the best facilities for our disabled supporters including Adults at Risk. The Club prides itself on being inclusive to all. We understand and recognise that disabled supporters may need assistance when visiting Cardiff City Stadium to enjoy their experience. We offer reasonable adjustments based on individual needs.

Further information is available on the Club website at [www.cardiffcityfc.co.uk/club/accessibility-disabled-supporters](http://www.cardiffcityfc.co.uk/club/accessibility-disabled-supporters)

The Club's **Disability Access Officer** (DAO) Ben Jones can be contacted via email at [ben.jones@cardiffcityfc.co.uk](mailto:ben.jones@cardiffcityfc.co.uk), over the phone by calling **02920 643718** or in person at Cardiff City Stadium.

### 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.

## 22. ADDITIONAL INFORMATION

### 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 staff to adults at risk. Generally, there should always be a minimum of two members of staff and ratio of:

- One member of staff to every ten adults at risk.

Activities may require more or less club employees 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 Head of Safeguarding will decide as to 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 Policy and Procedures.

## Confidentiality

Every effort will 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.

## Information sharing

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

1. 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 Head of Safeguarding 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 the Safeguarding Concern Report Form (see Appendix) and the online platform 'My Concern'.

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

# APPENDICES

## A. GLOSSARY

**The Care Act** defines additional types of abuse related specifically to safeguarding Adults at Risk which are described below:

- **Bullying:** Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.
- **Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.
- **Financial or material abuse:** Stealing from a vulnerable person, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned, this is a significant area of risk.
- **Modern slavery:** Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Neglect/acts of omission:** Ongoing failure to meet the basic needs of Children and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Children and Adults at Risk are safe and adequately supervised or exposing Children and Adults at Risk to unnecessary risks.
- **Organisational:** Neglect and poor care practice within an institution or specific care setting such as a hospital, care home or where care is provided within an Adult at Risk'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 or practices within an organisation.
- **Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.
- **Self-neglect:** Neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding.
- **Sexual abuse:** Any act which results in the exploitation of Children and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

**Adult in need of care and support** is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors.

A person's disability or age does not mean that they will inevitably experience harm or abuse.

In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors.

In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

**Adult at Risk** is an adult who:

- A.** is experiencing or is at risk of abuse or neglect,
- B.** has needs for care and support (whether or not the authority is meeting any of those needs), and
- C.** as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence (this list is not exhaustive). An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

**Adult safeguarding** is protecting a person's right to live in safety, free from abuse and neglect.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Capacity Act 2005).

**County lines:** The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children and Adults at Risk. Gangs recruit Children and Adults at Risk through deception, intimidation, violence, debt bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

**Cyber Bullying** – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

**Domestic Abuse and coercive control** – including psychological, physical, sexual, financial and emotional abuse. It can occur between any family members. It also includes so called 'honour' based violence which relates to a collection of practices used to control behaviour within families to protect perceived cultural and religious beliefs and/or honour.

**Discriminatory Abuse** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

**Female genital mutilation (FGM):** Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

**Forced Marriage** – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence to force someone to marry. The forced marriage of adults occurs when the adult does not have the capacity to consent to the marriage.

**Grooming:** The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

**Hazing:** Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Children and Adults at Risk.

**Infatuations:** Children and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/her, or with a colleague, should discuss this at the earliest opportunity with a member of the Safeguarding Team.

**Making Safeguarding Personal** means placing the adult at the centre of the safeguarding process. The adult's views and desired outcomes should always direct the safeguarding process.

**Mate Crime** – a 'mate crime' as defined by the Safety Net Project as 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

**Peer-on-peer abuse:** Children and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

**Poor practice:** This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children and Adults at Risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children and Adults at Risk, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

**Radicalisation** – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

**Self-neglect** – this covers a wide range of behaviour: neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Well-being duty.** People have a responsibility for their own well-being, supported by their families, friends and communities. Well-being includes protection from abuse and neglect (Section 5 Social Services and Well-Being Act (Wales) 2014).

## Additional Information

### Bullying & Cyber-Bullying

Bullying and cyberbullying can happen to any child or adult at risk. Cardiff City Football Club pledges to help keep them both safe from bullying, wherever it happens.

#### What is Bullying?

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

It can happen anywhere – at Club activities, at school, at home or online. It’s usually repeated over a long period of time and can hurt both physically and emotionally.

Bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone
- verbal bullying: name calling, gossiping or threatening someone
- non-verbal abuse: hand signs or text messages
- emotional abuse: threatening, intimidating or humiliating someone
- exclusion: ignoring or isolating someone
- undermining, constant criticism or spreading rumours
- controlling or manipulating someone
- making silent, hoax or abusive calls
- racial, sexual or homophobic bullying
- bullying someone because they have a disability.

#### What is cyberbullying?

Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow wherever the child or adult at risk go, via social networks, gaming and mobile phone.

Cyberbullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a person
- encouraging persons to self-harm
- voting for or against someone in an abusive poll

- creating fake accounts, hijacking or stealing online identities to embarrass a person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children or adults at risk into sending sexual images or engaging in sexual conversations.

## Signs of bullying

No single sign will indicate for certain that a child or adult at risk is being bullied, but watch out for:

- belongings getting 'lost' or damaged
- physical injuries, such as unexplained bruises
- being afraid to leave the house, being mysteriously 'ill' each morning, or skipping school/college or scheduled appointments
- asking for, or stealing, money (to give to whoever's bullying them)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

## Effects of bullying

The effects of bullying can last for many years. At its worst, bullying has driven children, young people, and adults at risk to self-harm and even suicide.

Those who are bullied:

- may develop mental health problems like depression and anxiety
- have fewer friendships
- aren't accepted by their peers
- are wary and suspicious of others
- have problems adjusting to school, and don't do as well.

All those affected by bullying can suffer harm – whether they are bullied, they bully others, or they witness bullying.

## Who's at risk -

Any child or adult at risk can be bullied for any reason. If they are seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

## **Reporting Bullying**

The concern reporting process is detailed in Part 16 of this document. Cardiff City Football Club will take all reports of bullying, discrimination and harassment seriously and adopt the appropriate process to ensure the reporting person is protected from repeat behaviour.

Cardiff City Football Club is a supporter of the annual Anti-Bullying Week facilitated by the Anti-Bullying Alliance.

You may also wish to access any of the following websites designed to give advice and guidance to parents, carers, adults at risk and children who are faced with dealing with bullying:

### **Guidance for parents/carers**

[www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

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

[www.kickitout.org](http://www.kickitout.org)

[www.bullying.co.uk](http://www.bullying.co.uk)

### **Guidance for young people and adults at risk**

[www.anncrafttrust.org/help-advice/](http://www.anncrafttrust.org/help-advice/)

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

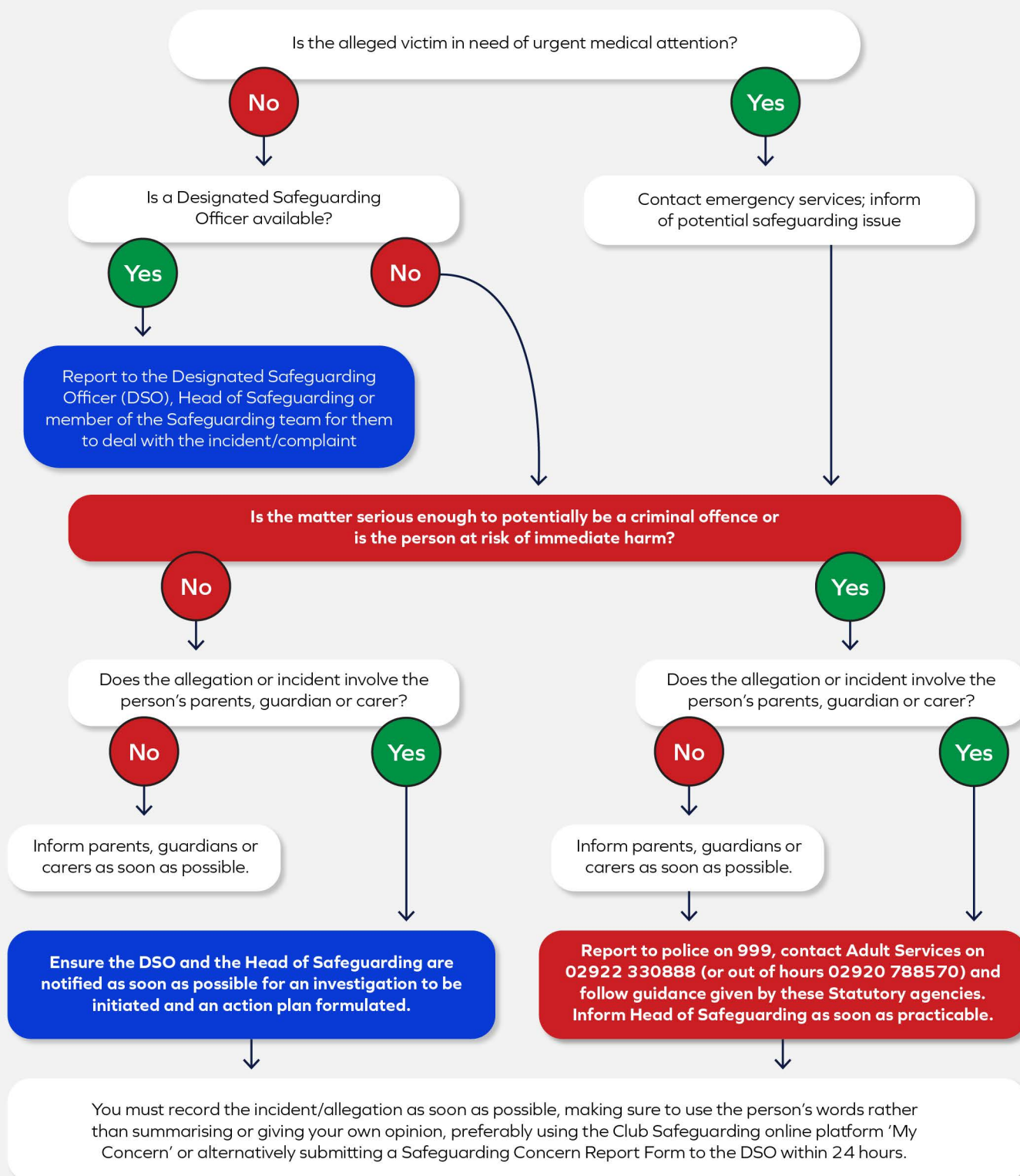
[www.kickitout.org](http://www.kickitout.org)

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

## B. FLOWCHART FOR RESPONDING TO A CONCERN, INCIDENT OR ALLEGATION

An Adult at Risk has disclosed concerning information to you OR you have witnessed OR had reported to you a concern or complaint involving an Adult at Risk, which may be considered abuse or poor practice.

**STAY CALM - REASSURE - TAKE SERIOUSLY - NO PROMISES - FEW QUESTIONS - FOLLOW FLOWCHART**



**IT IS IMPORTANT WHEN CONSIDERING YOUR CONCERN THAT YOU KEEP THE PERSON INFORMED ABOUT ANY DECISIONS AND ACTIONS TAKEN ABOUT THEM AND ALWAYS CONSIDER THEIR NEEDS AND WISHES.**

## C. EASY READ SAFEGUARDING ADULTS POLICY



### Cardiff City Football Club Easy Read Safeguarding Adults Policy

#### Our belief

- Your safety is very important to us
- You and all adults have equal rights to protection

#### Our aim

- To provide a safe environment – free from harm, discrimination and bullying

#### Please read

We want you to be safe and to know:

- What you can do to keep yourself or others safe; and
- how you can get help and advice in the community.

#### What is safeguarding?

Safeguarding helps vulnerable people to live free from abuse. This includes children (Under 18s) and adults at risk.

Sometimes we may see or hear things and need to take action to keep someone safe.

#### Who is vulnerable?

Some adults may be at a higher risk of abuse because of their age, disability or illness. We use the term adult at risk (also sometimes called a vulnerable adult).

An adult at risk of harm is someone who is 18 years or older who:

- has care and support needs due to their age, disability, mental health needs, drug or alcohol misuse or other conditions: and
- is unable to protect themselves.

#### What is abuse?

Abuse is when someone does or says something to make someone else feel upset, scared or frightened. Someone has been treated badly by someone else.

#### Where abuse can happen?

Abuse can happen anywhere and at any time.

#### Anyone can abuse

A stranger or someone you know - this could be a friend or neighbour, a partner or relative, a carer, other service users or someone you think you can trust.

## Abuse happens in many ways



### Physical Abuse

Being hit, slapped or kicked or being hurt in another way



### Sexual Abuse

When someone touches your body in ways you do not like or want.

When someone makes you do sexual things that make you sad, angry or frightened.



### Emotional Abuse

When someone says bad things to hurt your feeling, shouts or threatens you.



### Financial / Material Abuse

When people take your money or belongings without asking or make you give them things.



### Neglect

When you do not get the help you need, such as medication, care needs or enough food.



### Discriminatory Abuse (Sometimes called Hate Crime)

When people treat you badly or unfairly because you are different. It could be because of your age or gender, sexuality or disability, race or religious belief.



### Domestic Violence or Abuse

When abuse occurs between partners or family members.



### Institutional / Organisational Abuse

Abuse is caused by an organisation and how they work. They will work in a way that suits them and not the adult at risk.

## Modern Slavery

Someone is forced to work with little or no pay or threatened with violence to work.

## Self Neglect

Someone might come to harm because they do not look after themselves, such as not eating or taking their medication or looking after their personal hygiene.

## Abuse is always wrong

### What to do if you think abuse has happened

To keep you and others safe, report abuse straightaway (within 24 hours).

By reporting abuse, you can help to make it stop.

- You make the person aware of the support available and what to do
- You can report abuse and/or seek advice.

### What you can do

- If someone is injured, you may need to help them to a doctor or call an ambulance (999)
- If you think a crime has occurred, you can call the police (999)
- You can get advice and you can do this without anyone knowing it is you.

### What happens when you report abuse?

People will:

- Listen to you
- Take your concerns seriously
- Respond sensitively
- Talk to you about your concerns
- Consider the wishes of the adult at risk

### What happens next?

Someone will:

- Talk to the police if it is a crime
- Support the adult at risk to achieve the changes they want
- Develop a plan with the adult at risk to keep them safe
- Consider if anyone else is at risk

### To report a crime

- In an emergency, call the police on 999
- If the person is not in danger, contact South Wales Police on 101

### To report a safeguarding concern

- Contact a member of the Safeguarding Team, Cardiff Adult Safeguarding Team or a Helpline – see our Contacts Page.

## Helplines



**Samaritans:** Samaritans is available around the clock, every single day of the year. Talk to us anytime you like in your own way and off the record, about whatever is getting to you.

Call us free at anytime on **116 123** or email [jo@samaritans.org](mailto:jo@samaritans.org)

Visit us – find your nearest branch at [www.samaritans.org](http://www.samaritans.org)



**Victim Support:** Victim Support provides free, confidential advice and practical help to anyone affected by any crime, no matter how long ago it took place, or whether it was reported to the police or not. Call free on the VS Supportline **08 16 89 111** or visit [www.victimsupport.org.uk](http://www.victimsupport.org.uk)



**The Silver Line:** The Silver Line Helpline is the only national, free and confidential helpline for lonely and isolated older people; offering information, advice and friendship.

Call **0800 4 70 80 90** (24 hours/free)



**RNIB:** RNIB is one of the UK's leading sight loss charities and the largest community of blind and partially sighted people. For advice and signposting to services call **0303 123 9999**.



**Mind:** Mind provides advice and support to empower anyone experiencing a mental health problem. Call Infoline: **0300 123 3393** Mon-Fri 9am-6pm or email: [info@mind.org.uk](mailto:info@mind.org.uk)



**Alzheimer's Society:** Alzheimer's Society's dementia advisers can support you directly by phone or face to face, as well as connect you to a range of local services. Call **0333 150 3456** or visit [alzheimers.org.uk](http://alzheimers.org.uk)

## D. SAFEGUARDING CONCERN REPORT FORM

<b>Please complete this form within 24 hours of the incident and return to the Designated Safeguarding Officer (DSO) as soon as possible.</b>	
Your name:	Job title:
Your address:	
Phone number(s):	Email address:
<b>Name and contact details of the victim (please complete as much information as is known)</b>	
Name:	
Position in Club: (participant, employee, volunteer etc.)	
Address:	
Date of birth:	Age: (at time of incident)
Gender:	Phone number:
Disability: (if any)	Other useful information:
<b>Name and contact details of alleged perpetrator (if known):</b>	
Name:	Club, role or organisation:
Address:	
If employee, job title:	
How long has this person held this position?	
Age:	Gender:
Email address:	Relationship of accused to the victim:
Do they hold a current CRC DBS check?	
Does this person work in any other role with children (e.g. performance teams, other clubs including grassroots clubs, teacher, scout, care worker etc.)? If yes, please give details:	
<b>Details of the allegation/incident/disclosure:</b>	
Date of incident:	Time of incident:
Where the incident took place:	
Were there any witnesses? If yes, please provide details below:	How would you categorise the incident (e.g. bullying, physical abuse, poor practice, assault etc.)?

What happened? Give as many details as you are able to remember. If a disclosure from a child, please remember to use the child's words rather than summarise it in your own words:

**Action taken by you or others so far:**

Have you or anyone else from the Club taken any action (e.g. suspended the accused etc.)?

Have you contacted a Safeguarding Officer?

If so, who and when?

Did you need to contact a statutory agency? If yes, give details below:

Signature:

Date:

**SHOULD YOU NEED ANY ASSISTANCE COMPLETING THIS FORM, PLEASE  
CONTACT YOUR DESIGNATED SAFEGUARDING OFFICER OR THE CLUB HEAD  
OF SAFEGUARDING, ROB CRONICK.**

## E. CLUB SAFEGUARDING TEAM & CONTACT DETAILS

### Cardiff City Safeguarding Team

Head of Safeguarding: **Rob Cronick**

Mobile: **07872 147351**

Email: [safeguarding@cardiffcityfc.co.uk](mailto:safeguarding@cardiffcityfc.co.uk)

### Club/Stadium/Academy

Disability Access Officer: **Ben Jones**

Mobile: **02920 643718**

Email: [ben.jones@cardiffcityfc.co.uk](mailto:ben.jones@cardiffcityfc.co.uk)

Stewarding and Event Manager: **Tom Nash**

Mobile: **07712 300648**

Email: [tomos.nash@cardiffcityfc.co.uk](mailto:tomos.nash@cardiffcityfc.co.uk)

Academy Player Care Manager: **Sarah Nightingale**

Mobile: **07872 147436**

Email: [sarah.nightingale@cardiffcityfc.co.uk](mailto:sarah.nightingale@cardiffcityfc.co.uk)

Academy Designated Safeguarding Officer: **Steve Pearce**

Mobile: **07718 111630**

Email: [steve.pearce@cardiffcityfc.co.uk](mailto:steve.pearce@cardiffcityfc.co.uk)

Women and Girls Designated Safeguarding Officer: **Iain Darbyshire**

Mobile: **07935 077620**

Email: [iain.darbyshire@cardiffcityfc.co.uk](mailto:iain.darbyshire@cardiffcityfc.co.uk)

### Community Foundation

Senior Safeguarding Manager: **Roxanne Williams**

Mobile: **07487 846778**

Email: [roxanne.williams@cardiffcityfc.org.uk](mailto:roxanne.williams@cardiffcityfc.org.uk)

### Cardiff Adult Safeguarding Team

Tel: **02922 330888** (office hours)

Tel: **02920 788570** (out of office hours)

Email: [safeguardingadults@cardiff.gov.uk](mailto:safeguardingadults@cardiff.gov.uk)

Emergency Services - Police/Ambulance/Fire – in an emergency call **999**

Police (non-emergency) – Call **101** to report a crime to local police

## Other Safeguarding Contacts in Football

### The English Football League (EFL) Safeguarding Team

Tel: **01772 325940**

Email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

### The FA Safeguarding Team

Tel: **0800 169 1863**

Email: [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)

If you are worried about your IMMEDIATE safety or the IMMEDIATE safety of another child or adult at risk, please call the Police using '**999**'

#### Other External Key Contacts:

NSPCC 24-hour Help Line - **0808 800 5000**

NSPCC Child Line - **0800 1111**

South Wales Police - **101** (Non-Emergency Number)

Cardiff Multi Agency Safeguarding Hub - **02920 536490** (office hours)

Adult Safeguarding - **02922 330888** (office hours)

Emergency Duty Team - **02920 788570** (out of office hours)

## Mental health

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

### The Samaritans

Tel: **116 123**

<https://www.samaritans.org>

### Mind

Tel: **0300 123 3393**

<https://www.mind.org.uk>

### Victim Support

Tel: **0808 1689 111**

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

### PFA

Tel: **07500 000777**

<https://www.thepfa.com/wellbeing>

### The Silver Line

Tel: **0800 470 8090**

## Online safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting vulnerable persons to be online more often. It is important that both participants and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

### UK Safer Internet Centre

<https://reportharmfulcontent.com/>

### ParentInfo

<https://parentinfo.org/>

### Internet Matters

<https://www.internetmatters.org/>

### ThinkuKnow

<https://www.thinkuknow.co.uk/>

### NetAware

<https://www.net-aware.org.uk/>



# **ROB CRONICK**

## **HEAD OF SAFEGUARDING**

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[www.cardiffcityfc.co.uk/club/safeguarding](http://www.cardiffcityfc.co.uk/club/safeguarding)