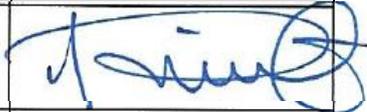




# **ADULT SAFEGUARDING POLICY**

Season 18/19

Title:	Adults Safeguarding Policy	
Date:	August 2018	
Review Date:	August 2019	
Created by:	Eleanor Rowland, Safeguarding Manager	
Stored Centrally:	Fulham FC Intranet and Website	
Circulation:	All Staff	
Approved, endorsed and signed by:		
Name	Position	Signature
Peter Limbert	General Counsel	
Alistair Mackintosh	CEO Fulham Football Club and Trustee of Fulham Football Club Foundation	

**Distribution**

This policy will be available for all staff to view on Fulham FC's Intranet.

Managers of staff without direct access to Fulham FC's Intranet must provide access to an up to date paper copy of the policy.

**Fulham Football Club**

## Contents

<b>1. Introduction</b>	<b>4</b>
<b>2. Rules, Regulations &amp; Legislation</b>	<b>4</b>
<b>3. Scope &amp; Governance</b>	<b>5</b>
<b>4. Definitions</b>	<b>5</b>
<b>5. Aims &amp; Key principles</b>	<b>6</b>
<b>6. Roles &amp; responsibilities</b>	<b>6</b>
<b>7. Human Resources &amp; Safer Recruitment</b>	<b>8</b>
Disclosure and Barring Service	8
Re-certification	8
FFP Certificate Expiration	8
Sessional Workers	9
<b>8. Safeguarding and Promoting Wellbeing</b>	<b>9</b>
Safeguarding people who do not have care and support needs	9
Promoting Wellbeing	10
Preventative Activities	10
Prevention	11
Reduction	11
Delay	11
<b>9. The Mental Capacity Act 2004</b>	<b>11</b>
<b>10. Recognising signs of abuse</b>	<b>11</b>
<b>11. Other Related Issues</b>	<b>14</b>
Disabilities	14
Disability Hate Crime	14
Self-Neglect	14
Prevent (Radicalisation and Extremist behaviour)	15
Sporting Activities for Adults	16
<b>12. Multi-Agency Working, Partnerships &amp; Outcomes</b>	<b>16</b>
Transitions (Care Leavers)	16
Chanel Panel	16
Multi-Agency Public Protection Arrangement (MAPPA)	16
Multi-Agency Risk Assessment Conference (MARAC)	17
Safeguarding Enquiries and Safeguarding Adult Reviews (SAR's)	17
<b>13. Information Sharing</b>	<b>17</b>
<b>14. Community Activity – “The Fulham FC Foundation”</b>	<b>17</b>
The FA Charter Standard	17
Fit for Purpose	17
Consent	17
HMP Activities and Programmes	18
Employability and other participant programmes	18

<b>15. Departmental Risk Assessments .....</b>	<b>18</b>
<b>16. Activities for Disabled Persons &amp; Adults at Risk.....</b>	<b>18</b>
<b>17. Code of Conduct.....</b>	<b>18</b>
<b>18. Positions of Trust .....</b>	<b>18</b>
<b>19. Reporting &amp; Recording Allegations, Abuse or Poor Practice .....</b>	<b>19</b>
Recording.....	20
<b>20. Allegations of abuse against members of Fulham Staff .....</b>	<b>20</b>
Confidentiality .....	21
<b>21. Continuous Learning and Development .....</b>	<b>21</b>
<b>22. Safeguarding Contacts .....</b>	<b>22</b>
<b>23. External Contacts .....</b>	<b>22</b>
<b>24. External Resources .....</b>	<b>22</b>
<b>25. Date and review .....</b>	<b>23</b>

## 1. Introduction

- 1.1. Fulham Football Club (“the Club”) and Fulham Foundation (FFCF) are committed to safeguarding and protecting adults at risk. They fully accept responsibility for the wellbeing and safety of all adults at risk who are under their care. References below to the Club are intended to apply to Fulham, FFCF and Union Jax as appropriate.
- 1.2. All adults have the right to protection from all forms of abuse and exploitation and it is the duty of all staff and volunteers as well as players and participants to safeguard adults at risk by creating an environment that protects them from harm. This policy also extends to all players and participants of the Club and FFCF.
- 1.3. The welfare of adults at risk is paramount for all staff and accordingly they must make themselves aware of the “Policy”. Where appropriate, the policy will be supplemented by in-service training and additional guidance. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

## 2. Rules, Regulations & Legislation

- 2.1. This Policy has been created in light of the Care Act 2014 and the Care and Support statutory guidance (2016), the London Multi Agency Adult Safeguarding Policy and Procedures (2017), FA Safeguarding Adults at Risk Policy (2017-18) Premier League and Football League Rules and guidance. In addition the following principles, legislation, rules, regulations and guidance underpin the Policy:

- London Multi Agency Adult Safeguarding Policy and Procedures (2016);
- Mental Capacity Act 2005;
- The Care Act 2014;
- Care and Support statutory guidance, March 2017 (Department of Health)  
(To support implementation of part 1 of the Care Act 2014 by local authorities);
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act (POFA) 2012;
- Female Genital Mutilation Act (2013);
- Sexual Offences Act (2003);
- UN Convention on the Rights of Persons with Disabilities (CRPD) (2006);
- The Equality Act (2010); and
- Data Protection Act (1998).

- 2.2. The Club is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the work we do. Due to the Club’s contact with adults who are at risk, staff are well placed to observe changes in an adult’s behaviour and outward signs of abuse and/or neglect.

- 2.3. This Policy is one of a series of Safeguarding Policies and Procedures and should be read in conjunction with the following:

- Fulham FC Safeguarding Strategy 2017-18;
- FFC Safeguarding Children Policy 18/19;
- Fit for Purpose Policy;
- Safer Recruitment Policy;
- Equal Opportunities Policy ;
- Complaints Policy and Procedure;
- Privacy Policy;
- Whistleblowing Policy;
- Ethics in Business Policy;
- People Management Policy;

- Incident Reporting Policy; and
- Offensive Weapons, Drugs and Violence Policy.

### 3. Scope & Governance

- 3.1. This Policy has been adopted by senior executives and management of the Club including FFCF's Board of Trustees. Both Club and FFCF are committed to prioritising safeguarding at a strategic level to ensure best practice in safeguarding is promoted and adhered to.
- 3.2. All safeguarding information is stored and retained in line with the Club's Privacy Policy. This includes guidance for data storage under the General Data Protection Regulation.
- 3.3. Activities undertaken at the following locations/departments are under the remit of this policy including:
  - Fulham Foundation including all activities on external sites;
  - Fulham First Team and Academy training ground (Motspur Park);
  - Fulham Ladies Football Club;
  - Craven Cottage Stadium;
  - Fulham Retail Stores;
  - Stadium Tours, Stewarding and all other activities on match days and roles that come in to contact with adults at risk;
  - Travel, Events and Support Liaison; and
  - Other Club related entities/activities undertaken outside of the UK.

### 4. Definitions

- 4.1. It is important to be clear about who the formal adult safeguarding process applies to. The Care Act 2014 statutory guidance defines adult safeguarding as:

*'Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'*

- 4.2. So safeguarding is for people who, because of issues such as dementia, learning disability, mental ill-health or substance abuse, have care and support needs that may make them more vulnerable to abuse or neglect.
- 4.3. The legal definition of an 'adult' is anyone who is over the age of 18.
- 4.4. 'Wellbeing' is a broad concept and it is described<sup>1</sup> as relating to the following areas in particular:
  - personal dignity (including treatment of the individual with respect);
  - physical and mental health and emotional wellbeing;
  - protection from abuse and neglect;
  - control by the individual over day to day life (including over care and support provided and the way it is provided);
  - participation in work, education or recreation;
  - social and economic wellbeing;
  - domestic, family and personal;
  - suitability of living accommodation; and

---

<sup>1</sup> Care Act 2014, Care and Support Statutory Guidance 2017

- the individuals contribution to society.

There is no hierarchy in the individual aspects of wellbeing and each of the above should be considered of equal importance when considering 'wellbeing' in the round.

## 5. Aims & Key principles

5.1. The Club and FFCF look at a person's life holistically, considering their needs in the context of their skills, ambitions, and priorities – as well as the other people in their life and how they can support the person in meeting the outcomes they want to achieve. The focus of all programmes where adults at risk are identified should be on supporting people to live as independently as possible for as long as possible.

5.2. The aims of this Policy are to:

- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs who interact with the Club and FFCF;
- stop abuse or neglect wherever possible;
- safeguard adults in a way that supports them in making choices and having control about how they want to live;
- promote an approach that concentrates on improving life for the adults concerned;
- raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect;
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult;
- address what has caused the abuse or neglect;
- demonstrate best practice in the area of safeguarding adults;
- positively reflect and promote the Club and FFCF Values (**Pioneers, Confident Custodians, Action Orientated, Open & Inclusive and Service Excellence**) in regard to safeguarding adults;
- commit to working in partnership across the Club and FFCF with external organisations including statutory bodies and local schools in order to safeguard and protect adults;
- develop a positive and pro-active welfare programme to enable all adults at risk to participate in an enjoyable and safe environment; and
- ensure that coaches, parents and other adults who come in contact with adults at risk are good role models of behaviour.

5.3. In addition, there are six key principles embedded within the Care Act 2014 that the Club and FFCF are committed to applying in all settings:

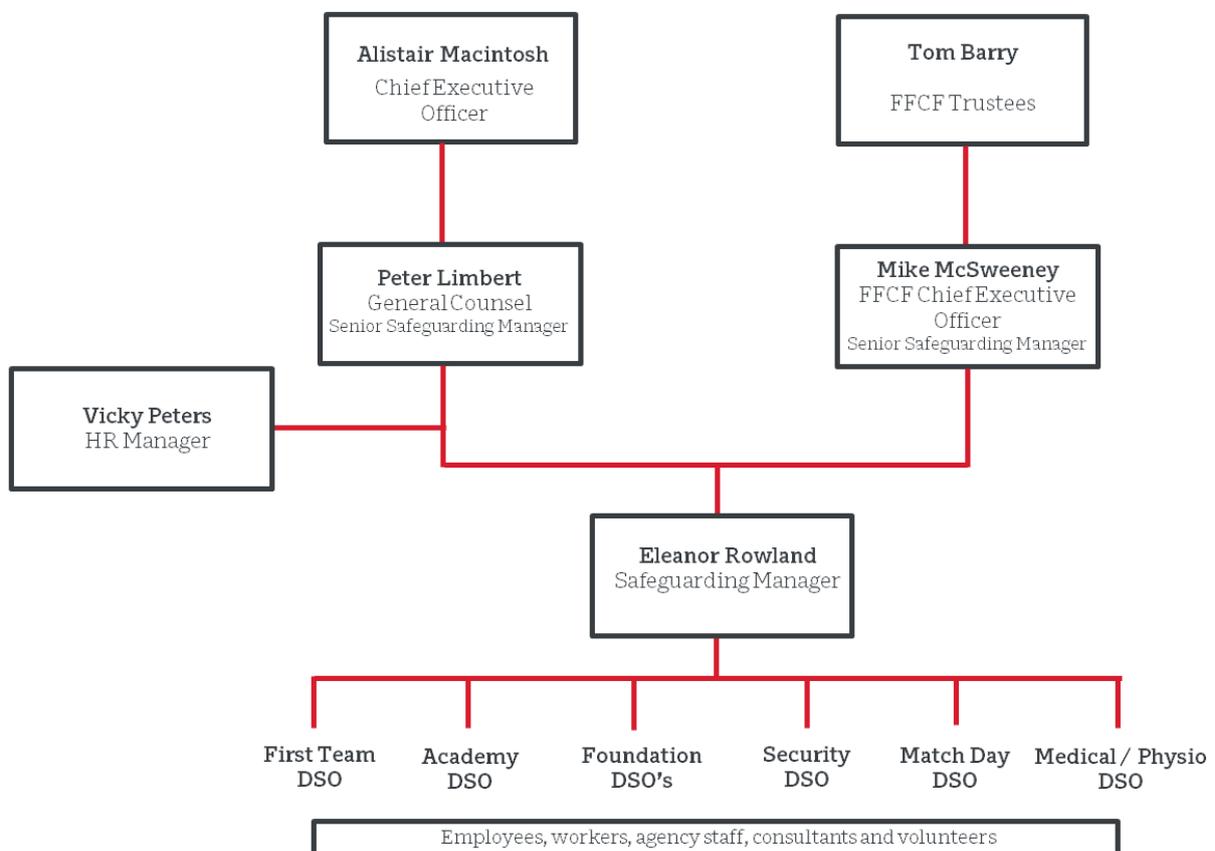
- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent
- **Prevention** – it is better to take action before harm occurs
- **Proportionality** – The least intrusive response appropriate to the risk presented
- **Protection** – Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in safeguarding practice.

## 6. Roles & responsibilities

6.1. The Club and FFCF has a comprehensive safeguarding structure which ensures the safety and welfare of all children and adults that engage with their services. For the purpose of this policy the safeguarding structure consists of; the Club Senior Safeguarding Manager (SSM) who takes leadership responsibility for the Club's safeguarding arrangements, the FFCF Senior Safeguarding Manager who takes leadership responsibility for FFCF's safeguarding arrangements, the

Safeguarding Manager (SM) who has overall responsibility for the day to day safeguarding of children and adults at the Club and FFCF and departmental Designated Safeguarding Officers (DSOs) who work within various areas of the business. These DSOs have specific departmental responsibilities and are the focal point for safeguarding adults and children in their area.

- 6.2. All job descriptions where the individual will be working with adults who have care and support needs or children and young people will reference the individual’s role and responsibility to safeguarding. The SSM, SM and DSO’s also have a clear reference within their job descriptions of their roles and responsibilities for safeguarding, equality and inclusion.
- 6.3. Peter Limbert, who is a member of the management board, has been appointed by the Club’s Chief Executive to act on behalf of the board as the Senior Safeguarding Manager for the Club. Mike McSweeney, FFCF Chief Executive Officer has been appointed to act on behalf of the FFCF board of Trustees as FFCF’s Senior Safeguarding Manager.
- 6.4. Eleanor Rowland as Safeguarding Manager, is responsible for the overall implementation of the safeguarding, case management and safer recruitment across the Club and FFCF.



- 6.5. **Club Chief Executive Officer** – responsible for all aspects of the Club and to ensure safeguarding is a key priority at Board Level.
- 6.6. **General Counsel** – the Clubs identified Safeguarding Senior Manager (SSM) and takes leadership responsibility for the Club’s Safeguarding arrangements. It is the SSM and SM’s role to make it clear that safeguarding is everyone’s responsibility and should ensure they discharge their duties where there are concerns by making a referral to the appropriate authorities.

- 6.7. **Foundation Chief Executive Officer** – FFCF’s identified Safeguarding Senior Manager (SSM) responsible for all aspects of the Foundations work and to ensure safeguarding is a key priority across the Foundation and at Board Level.
- 6.8. **Human Resources Manager** – responsible for assisting the Club and FFCF to deliver the safeguarding strategy, priorities, policies and the safer recruitment procedure.
- 6.9. **Safeguarding Manager** – responsible for the strategic and operational direction of all safeguarding activities and for embedding safeguarding across the Club and FFCF. The SM is also the first point of contact should safeguarding concerns arise. The SM is responsible for ensuring all vetting checks adhere to the Club’s Recruitment Policy as well as legislation and governing body rules.
- 6.10. The SM will undertake regular monitoring and risk assessments of all activities involving adults at risk (or will designate this task to a DSO, the Health & Safety Manager or an external assessor where appropriate) as well as holding formal ‘recorded’ meetings on a six weekly basis.
- 6.11. DSOs are appointed to provide a lead for safeguarding within their departments at the Club and FFCF as well as being the point of contact should a concern arise within their own departments.
- 6.12. DSO’s will meet on a 6 weekly basis to review incidents and share information in accordance with the Care Act and statutory guidance. The minutes of such meetings will be recorded and stored appropriately and in line with the Club Privacy Policy and should be shared with the SSM.
- 6.13. Employees, workers, agency staff, consultants and volunteers are responsible for familiarising themselves with the Club and FFCF’s policy and procedures, ensuring the safety and welfare of all adults with care and support needs and children and young people as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.
- 6.14. Anybody with a concern about an adult’s welfare should contact the SM or a DSO for advice in the first instance – details can be found at the end of this policy.

## **7. Human Resources & Safer Recruitment**

### **Disclosure and Barring Service**

- 7.1. All Club, FFCF staff and casual coaches who work with adults who have additional care and support needs will complete an Enhanced DBS check with Adults barred list, every three years. For more detailed information on Safer Recruitment refer to the Clubs Safer Recruitment Policy.

### **Re-certification**

- 7.2. It is an expectation of all staff who work with adults with care and support needs to keep their certificates up to date. All certificates including DBS, FA Safeguarding and First Aid expire after three years.
- 7.3. All Club and FFCF staff are required to re-apply for their DBS no later than three months before expiry.
- 7.4. All Club, FFCF staff and casual coaches are responsible for ensuring they attend an FA recognised First Aid and FA Safeguarding Course at least one month before the expiration of their previous certificate.

### **FFP Certificate Expiration**

- 7.5. Where a certificate expires but the individual has applied within the recommended timeframe, the individual will be taken off regulatory activity and will be provided with alternative non-regulatory

duties, at the Head of Departments discretion. Casual coaches will not be offered work until they are able to provide evidence of re-certification.

- 7.6. If an employee has not applied for recertification within the recommended timeframe, and becomes unfit for purpose, at the Head of Departments discretion, the individual may be suspended without pay until re-certification is complete and evidence is provided.

### **Sessional Workers**

- 7.7. All sessional workers (casual coaches) are expected to attend regular Safeguarding updates delivered by the Safeguarding Manager. Work will not be offered if the sessional worker cannot attend.
- 7.8. If a sessional worker has not worked for the Club or FFCF for 6 months (or since the previous season) they will be made inactive on the Single Central Record. In order to re-start work and if their DBS is still within its three year term, the individual will be required to submit a self-declaration form and attend a Safer Working Practice induction, delivered by the Safeguarding Manager.
- 7.9. If any of the above certificates have expired these will be required to be renewed before work can be offered.

## **8. Safeguarding and Promoting Wellbeing**

- 8.1. The Club and FFCF safeguarding duty applies when there is 'reasonable cause to suspect that an adult in its area:
- has needs for care and support (whether or not the authority is meeting any of those needs);
  - is experiencing, or is at risk of, abuse or neglect; and
  - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.' (Care Act 2014, section 42)
- 8.2. Where someone is 18 or over but is still receiving children's services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.
- 8.3. Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.
- 8.4. Organisations should always promote the adult's wellbeing in their safeguarding arrangements. People have complex lives and being safe is only one of the things they want for themselves. Professionals should work with the adult to establish what being safe means to them and how that can be best achieved. Professionals and other staff should not be advocating 'safety' measures that do not take account of individual well-being.

### **Safeguarding people who do not have care and support needs**

- 8.5. Many agencies are facing the challenge of how to support people who are at increased risk of abuse, but who do not have care and support needs. This includes carers, many people who self-neglect, homeless people, and survivors of domestic abuse. Many organisations support people who do not meet the safeguarding criteria, but who may be being abused and are unsure where to go next.
- 8.6. Wherever someone is being harmed, or at risk if harm, there are agencies that can help, even if a formal safeguarding response is not triggered. These include:

- the police;
- domestic abuse services;
- the National Referral Mechanism for victims of modern slavery;
- community and support groups; and
- other social services teams<sup>2</sup>.

A local authority safeguarding response is not the only, or always the most appropriate, response to keeping people safe.

### Promoting Wellbeing

- 8.7. Promoting wellbeing involves actively seeking improvements in the aspects of wellbeing outlined in section 4.3 of this policy, these factors will vary in their relevance and application to each individual. For instance, for some people spiritual and religious beliefs will be of great significance and therefore should also be taken in to account. The Club and FFCF can promote an individual's wellbeing in many ways. How this will happen will depend on the individual's needs, goals, wishes and how these will impact on their wellbeing.
- 8.8. The Club and FFCF staff working on programmes where adults may be considered to be at risk must assume that the individuals participating in the programme are best placed to judge their own wellbeing. This is a person-centred approach and this builds on the principles of the Mental Capacity Act and staff should assume that participants know best their own outcomes, goals and wellbeing. The Club and FFCF should not make assumptions as to what matters most to a person.
- 8.9. Care and support should be personal and The Club and FFCF staff should not make decisions from which the person is excluded.
- 8.10. In all programmes where adults may be considered at risk the Club and FFCF staff should consider how the person is and remains protected from abuse and neglect, this includes self-neglect.

### Preventative Activities

- 8.11. Preventative activity cannot be defined specifically as it can range from wide-scale whole-population measures aimed at promoting health, to more targeted interventions aimed at improving skills or functioning for one person or a particular group or lessening the impact of caring on a carer's health and wellbeing.
- 8.12. Preventative activity is currently divided into three sub categories under the Care Act, prevent (primary), reduce (secondary) and delay (tertiary) prevention. The Club and FFCF in general will offer primary prevention activities but do on occasions offer programmes with secondary and tertiary benefits.
- 8.13. The Club and FFCF are both committed to delivering programmes which would fall under these categories, they are as follows:

Stage of Prevention	Programme
Prevention	<ul style="list-style-type: none"> <li>• Fulham Fit</li> <li>• Walking Football</li> </ul>
Reduction	<ul style="list-style-type: none"> <li>• Active Autism</li> <li>• Mental Health Programmes</li> <li>• Employability Programmes</li> </ul>
Delay	<ul style="list-style-type: none"> <li>• Sporting Memories (supporting individuals who</li> </ul>

<sup>2</sup> A local authority has duties to promote an individual's wellbeing, to prevent or delay care needs from developing, and to assess someone if there are safeguarding concerns and it appears that the person may have care and support needs, even if the person does not want an assessment. All of these may be helpful in a complex situation.

**Prevention**

8.14. Primary preventative activities are aimed at individuals who have no current particular health or care and support needs and activities are developed to help an individual avoid the need for support or care. These services are generally universal in nature and may include but are not restricted to the following objectives:

- Provide universal access to good quality information
- Support safer neighbourhoods
- Promote health and active lifestyles (for instance an exercise class)
- Reduce loneliness and or isolation

**Reduction**

8.15. Secondary preventative activities are more targeted in approach towards individuals who are considered at an increased risk of developing needs. This is where the Club or FFCF programmes will support in the delay, reduction and deterioration of further needs developing. This early support can stop an individual's life from tipping into a crisis.

**Delay**

8.16. Tertiary preventive activities are aimed at individuals with established and complex health needs.

**9. The Mental Capacity Act 2004**

9.1. The Mental Capacity Act applies to everyone involved with the care, treatment and support of people aged over 16 and who are unable to make decisions for themselves. The Club and FFCF take their responsibility to protect those who lack capacity to make decisions for themselves seriously.

9.2. It is important that all Club and FFCF staff understand that people with capacity have the right to make decisions that may put themselves at risk. This is a longstanding challenge for safeguarding adults, and a recent overview of Safeguarding Adults Reviews highlights how frequently the Mental Capacity Act is misused in adult safeguarding cases. If someone with mental capacity has declined a safeguarding intervention, there are some grounds on which that can be overridden – for example, if other people are at risk. But the Mental Capacity Act is very clear that everyone with capacity can make their own decisions. This applies even in the important area of keeping safe and feeling in control of one's life.

9.3. For the purpose of the Clubs and FFCF's programme delivery, all adults are deemed to have capacity unless there has been a formal capacity assessment to indicate otherwise in line with Mental Capacity Act 2004.

**10. Recognising signs of abuse**

10.1. The Care and Support statutory guidance identifies types of abuse, but the Club and FFCF should not limit their view of what constitutes abuse or neglect. If you have a concern regarding the potential abuse of an adult with care and support needs please report this to your line manager, SM or SSM.

10.2. The Club and FFCF provide a description, extracted from the London Multi Agency safeguarding policy and procedures (2016) of adults who are most at risk and abuse indicators. This list is not exhaustive.

Type Of Abuse	Description
<b>Domestic Abuse</b>	The Home Office (March 2013) defines domestic abuse as: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: Psychological; Physical; Sexual; Financial; Emotional. Domestic Abuse includes controlling and coercive.
<b>Discriminatory Abuse</b>	Discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.
<b>Female genital mutilation (FGM)</b>	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 (2003) 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.
<b>Financial Abuse</b>	Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
<b>Forced Marriage</b>	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. In a situation where there is concern that an adult is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as urgent action may need to be taken.
<b>Hate Crime</b>	The police define Hate Crime as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability'. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition it includes incidents that do not constitute a criminal offence.
<b>Honour based violence</b>	Will usually be a criminal offence, and referring to the police must always be considered. It has or may have been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Some of these victims will contact the police or other organisations. However, many others are so isolated and controlled that they are unable to seek help.  Adult safeguarding concerns that may indicate honour-based violence include domestic violence, concerns about forced marriage, enforced house arrest and missing person's reports.
<b>Human Trafficking</b>	Is actively being used by Serious and Organised Crime Groups to make considerable amounts of money. This problem has a global reach covering a wide number of countries. Human Trafficking is run like a business with the supply of people and services to a customer, all for the purpose of making a profit. Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regard for the victim's welfare

	and health. The Organised Crime Groups will continue to be involved in the trafficking of people, whilst there is still a supply of victims, a demand for the services they provide and a lack of information and intelligence on the groups and their activities.
<b>Mate crime</b>	A 'mate crime' as defined by the Safety Net Project is '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 often difficult for police to investigate, due to its sometimes ambiguous nature, but should be reported to the police who will make a decision about whether or not a criminal offence has been committed. 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.
<b>Modern Slavery</b>	<p>Slavery, servitude and forced or compulsory labour. A person commits an offence if:</p> <ul style="list-style-type: none"> <li>• The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or</li> <li>• The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.</li> </ul> <p>There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:</p> <ul style="list-style-type: none"> <li>• Forced to work - through mental or physical threat;</li> <li>• Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;</li> <li>• Dehumanised, treated as a commodity or bought and sold as 'property';</li> <li>• Physically constrained or has restrictions placed on his/her freedom of movement.</li> </ul> <p>Contemporary slavery takes various forms and affects people of all ages, gender and races. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults, promised paid work opportunities enslaved and forced to work and live in dehumanised conditions, and adults with a learning difficulty restricted in their movements and threatened to hand over their finances and work for no gains.</p>
<b>Neglect and acts of omission</b>	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.
<b>Organisational Abuse</b>	Is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.
<b>Physical Abuse</b>	Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
<b>Psychological Abuse</b>	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal

	abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
<b>Restraint</b>	Unlawful or inappropriate use of restraint or physical interventions. In extreme circumstances unlawful or inappropriate use of restraint may constitute a criminal offence. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not. Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do.
<b>Sexual Abuse</b>	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
<b>Sexual exploitation</b>	Involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. It affects men as well as women. People who are sexually exploited do not always perceive that they are being exploited. In all cases those exploiting the adult have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources. There is a distinct inequality in the relationship. Signs to look out for are not being able to speak to the adult alone, observation of the adult seeking approval from the exploiter to respond and the person exploiting the adult answering for them and making decisions without consulting them.

## 11. Other Related Issues

### Disabilities

- 11.1. The UN Convention on Rights of Persons with Disabilities (CRPD) was developed in 2006 and gives universal recognition to the dignity of persons with disabilities. The CRPD is clear that persons with disabilities are not viewed as “objects” of charity, medical treatment and social protection; rather as “subjects” with rights, who are capable of claiming those rights and making decisions for their lives based on their free and informed consent as well as being active members of society.<sup>3</sup>
- 11.2. The CRPD describes disability as an evolving concept and that persons with disabilities include those who have long term physical, mental, intellectual and sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

### Disability Hate Crime

- 11.3. The Criminal Justice System defines a disability hate crime as any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on a person's disability or perceived disability. The Police monitor five strands of hate crime, Disability; Race; Religion; Sexual orientation; Transgender.

### Self-Neglect

- 11.4. Self-neglect is a behavioural condition in which an individual neglects to attend to their basic needs such as personal hygiene, or tending appropriately to any medical conditions, or keeping their environment safe to carry out what is seen as usual activities of daily living. It can occur as a result of mental health issues, personality disorders, substance abuse, dementia, advancing age, social isolation, and cognitive impairment or through personal choice. It can be triggered by

<sup>3</sup> UN CRPD

trauma and significant life events. Self-neglect is an issue that affects people from all backgrounds.

### **Prevent (Radicalisation and Extremist behaviour)**

- 11.5. 'Prevent' is part of the British Governments counter terrorism strategy CONTEST<sup>4</sup> which aims to stop people becoming terrorists or supporting terrorism. Prevent builds upon 'Channel', the existing multi-agency programme to identify and provide support to people at risk of radicalisation.
- 11.6. Radicalisation is often a process as opposed to an event. During this process it is possible to intervene to prevent vulnerable people being drawn into terrorist related activity.
- 11.7. The Club and FFCF work with many people and often supports vulnerable groups which places them in a position of great influence. We must be credible and able to reach and talk to people who may be at risk.
- 11.8. The Prevent Strategy states there are three main groups that pose a risk to the UK and these are:
- International Terrorism – The most significant threat is from Al Qaida, its affiliates and likeminded terrorist organisations inspired by violent Islamism.
  - Northern Ireland related Terrorism - The current threat comes principally from republican terrorist groups opposed to the political process, including the Real Irish Republican Army (RIRA)
  - Extreme right-winged terrorism - Extreme right-wing terrorism in the UK has been much less widespread, systematic or organised than terrorism associated with Al Qaida. It involves groups such as the English Defence League and Combat 18.
  - Other forms of terrorism - In the past thirty years many other types of terrorist groups have been active in this country, sometimes planning attacks and at other times raising funds and recruiting people to their cause. Some of the groups have been predominantly secular; others have had both political and religious motivations.
- 11.9. Radicalisation is comparable to other forms of exploitation, such as grooming and sexual exploitation. 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.
- 11.10. There are a number of factors that make an individual susceptible to exploitation by violent extremists. The following is a list of vulnerability factors, none of which should be considered in isolation:

- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group

<sup>4</sup> HM Government; Prevent Strategy

- Relevant mental health issues
- Feelings of grievance and injustice
- Feeling under threat

- 11.11. If you suspect someone to be at risk of exploitation by violent extremists it is important that you share this information with your line manager and Club Safeguarding Manager in order for a referral to be made to the appropriate authorities. Quite often this will be a 'Chanel' panel.
- 11.12. The Club and FFCF Home Office accredited 'Prevent' lead is Eleanor Rowland. Training on 'Prevent' is provided throughout the year to all staff including senior management.
- 11.13. If there are concerns about an immediate or possible risk of an individual initiating a violent extremist attack, the Police should be notified immediately.

#### **Sporting Activities for Adults**

- 11.14. Injuries resulting from physical abuse differs from that which occurs in the context of sport because most sports injuries are accidental or the result of a momentary lack of care.
- 11.15. The Club and FFCF are responsible for ensuring all activities that are offered are delivered in a safe environment, please see section 15 on departmental risk assessments. If there are any concerns that an injury during a sporting activity was caused due to malicious, bullying or aggravated circumstances this should be reported as described in section 19.

## **12. Multi-Agency Working, Partnerships & Outcomes**

- 12.1. It is critical that agencies work together to prevent abuse from happening and to identify abuse where it is happening. Children and adults who are identified as at risk are often known to services and may already have a safeguarding plan in order to manage their safety within the community and within their home. It is everyone's responsibility to ensure that good multi-agency working occurs as this has the potential for lives to be saved.
- 12.2. The potential for positive outcomes for adults and children are significantly increased when agencies work collaboratively and share information appropriately and within a timely manner.
- 12.3. When a referral is made in regards to the safeguarding needs of an adult at risk, the Club and FFCF's responsibility may extend beyond this stage and result in a need for further information being shared with the statutory authorities, participants or their parents/carers. The following describes some of the partnership interventions that the Club or FFCF could be involved with:

#### **Transitions (Care Leavers)**

- 12.4. The Club and FFCF will ascertain where possible whether robust joint working arrangements between children's and adult services have been put in place to ensure that the needs of the children leaving care are addressed as they move to adulthood and become or continue to be involved in Club activities.

#### **Chanel Panel**

- 12.5. The Chanel Panel is a multi-agency approach to working with people who are at risk of being groomed into terrorism. It is a voluntary process for those affected and where a referral is made the Club or FFCF staff may be requested to be part of the multiagency professionals involved. The line manager and Safeguarding Manager should be notified where staff are requested to participate.

#### **Multi-Agency Public Protection Arrangement (MAPPA)**

- 12.6. From time to time we may be advised that our participants or their family members may be subject to a MAPPA. These are designed to protect the public, including previous victims of crime, from serious harm by sexual and violent offenders. They require the local criminal justice

agencies and other bodies dealing with offenders to work together in partnership in dealing with these offenders<sup>5</sup>. This is in order to produce a risk management plan to manage individuals safely within the community. If appropriate and requested to, the line manager and Safeguarding Manager should be notified where staff are requested to participate.

#### **Multi-Agency Risk Assessment Conference (MARAC)**

- 12.7. A Multi-Agency Risk Assessment Conference (MARAC) is a victim focused information sharing and risk management meeting attended by all key agencies, where high risk cases are discussed. The role of the MARAC is to facilitate, monitor and evaluate effective information sharing to enable appropriate actions to be taken to increase public safety. In a single meeting, MARAC combines up to date risk information with a timely assessment of a victim's needs and links those directly to the provision of appropriate services for all those involved in a domestic abuse case: victim, children and perpetrator. If appropriate and requested to, the line manager and Safeguarding Manager should be notified where staff are requested to participate.

#### **Safeguarding Enquiries and Safeguarding Adult Reviews (SAR's)**

- 12.8. Where any adult is the subject of either a Safeguarding Enquiry or SAR the Local Authority must arrange, where necessary, for an independent advocate to support and represent the individual. If the Club or FFCF staff are requested to partake in a SAR the Safeguarding Manager must be notified immediately.

### **13. Information Sharing**

- 13.1. The Care Act stresses that people being abused, and those making referrals about it to local authority safeguarding teams, should be included and kept informed throughout any safeguarding enquiry.
- 13.2. The Club and FFCF are compliant with the General Data Protection Regulations please refer to the Club Privacy Policy for more information on the storage and retention of safeguarding records.

### **14. Community Activity – “The Fulham FC Foundation”**

#### **The FA Charter Standard**

- 14.1. FFCF ensures full compliance with the FA Charter Standard, it also endeavours to adhere to the rules and guidelines issued by the Football League with regard to safeguarding Adults at Risk.

#### **Fit for Purpose**

- 14.2. All FFCF activities are governed by a Fit for Purpose Policy which covers the following:

- DBS detail
- Coaching qualifications
- Ratios
- Risk Assessment
- Service Level Agreements & Partnership Agreements
- Registration & Dispersal Procedures
- Accident / Incident Report Forms
- Coach Guidelines & Code of Conduct
- First Aid / Administration of Medication

#### **Consent**

- 14.3. The FFCF will obtain consent for all activities. If an individual has been assessed as not capable of providing consent, suitable consent from an individual's carer will be sought.

---

<sup>5</sup> Ministry of Justice MAPPA Guidance 2012

### **Ratios**

- 14.4. There is no statutory guidance regarding ratios for adult groups. The Club and FFCF will risk assess individual activities and the needs of the group before making a record of the maximum group size per coach.

### **HMP Activities and Programmes**

- 14.5. Where individuals are required to work within Her Majesty's Prisons (HMP) appropriate DBS and additional police vetting checks will be required.
- 14.6. Additional safety training will be provided by the local establishment and governance protocols will be outlined within a Service Level Agreement. For instance, safeguarding referral pathways will be in line with the establishment's protocols.

### **Employability and other participant programmes**

- 14.7. FFCF reserve the right to gather further information on participants of any programme who is over the age of 18 should they have any additional concerns about their potential risk to staff, themselves or other participants. Allocation to programmes is therefore at the discretion of the Safeguarding Manager and Head of Operations, based on satisfactory reference checks and DBS.

## **15. Departmental Risk Assessments**

- 15.1. The Club and FFCF undertake risk assessments for each activity they operate on a bi-annual basis and these are completed in consultation with the respective Department Manager and, where necessary, the Safeguarding Manager and Health and Safety Manager.
- 15.2. In the event of an incident, near miss or other further intelligence reported which could impact on the safety of others a review of the risk assessment should take place with immediate effect.
- 15.3. All adults are encouraged to wear appropriate shoes and protective equipment as appropriate to the sports activity. Coaches are required to adapt the sessions should there be participants who are unable to wear the required protective attire.

## **16. Activities for Disabled Persons & Adults at Risk**

- 16.1. The Club and FFCF carries out all activities for disabled persons and adults at risk under the guidelines of the Equality Act 2010 and Safeguarding Vulnerable Groups Act 2006.
- 16.2. All reasonable measures will be taken in order to ensure that anyone who has a disability is able to participate in the programmes offered by both the Club and FFCF.
- 16.3. All activities will have appropriate session plans and will include warm ups and activities relevant to the needs of the individuals participating.

## **17. Code of Conduct**

- 17.1. Each session delivered by the Club or FFCF applies a code of conduct which defines the behaviour expectations of both participants and staff. For more detail please refer to the Fit for Purpose Policy.

## **18. Positions of Trust**

- 18.1. Unfortunately, it is possible for adults in football to do a lot of harm by bullying, harassing, neglecting or abusing adults with additional care or support needs; or by failing to respond to concerns they may have. Although football coaches are not currently legally recognised as positions of trust, if you work or intend to work with adults or young people, you are

automatically placed in a position of trust that carries authority, status, power and responsibility. All adults employed at the Club and FFCF are in roles are considered as positive role models, displaying high moral and ethical standards. If there are any concerns in regards to a member of staffs behavior or attitude this should be reported as described in section 19.

## **19. Reporting & Recording Allegations, Abuse or Poor Practice**

19.1. Where a person is at risk of abuse or neglect, it is important that the Club and FFCF staff act swiftly and put in place an effective response. If it appears that an individual is experiencing, or at risk of, abuse or neglect, they must refer this information immediately to their line manager and the Safeguarding Manager.

19.2. It is likely that if you have a concern this will be about poor practice rather than abuse. Both occur in football and both require action.

19.3. The primary responsibility of the Club is to ensure:

- concerns and any relevant information about possible abuse are shared with the Safeguarding Manager and relevant authorities without delay
- the safety and wellbeing of the adult at risk whilst under its supervision.

If there are concerns about 'possible' abuse please report your worries to your line manager who is responsible for making a decision about what to do next. If your manager is not available; or you don't feel able to go to your manager; or you are worried your manager may be a part of the abuse, you can:

- tell your line manager's manager;
- Safeguarding Manager; or
- when Club officials are not available, contact social care services (see Contacts).

19.4. All staff should immediately report any observations, allegation or suspicions of abuse or poor practice by another professional to the Safeguarding Manager as early possible and within 24 hours in any circumstance.

19.5. The following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice:

- Listen carefully to the adult. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the individual to 'shut down', retract or stop talking
- Let them know they've done the right thing. Reassurance can make a big impact to the individual who may have been keeping the abuse secret
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the individual has told you could make the situation a lot worse.
- Ask the adult what action they would like you to take. His may involve contacting a professional or another family member.
- An adult should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present and any marks raising concern should be recorded on the skin map included within the incident and report form.
- If the adult does not want you to take any further action you have to respect this decision, unless you are concerned someone else may be at risk or are aware that the individual does not have capacity (as assessed by a professional).
- You should make the adult aware that you will notify the Club's Safeguarding Manager and that their wishes will be respected.

- Where the adult provides consent for their disclosure to be shared, do not delay reporting the abuse. The sooner the abuse is reported after the adult discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- Write down everything said and what was done and sign and date the notes if handwritten. An Incident Report Form should be used and sent to your line manager and the Safeguarding Manager as soon as possible and within 24 hours.

**DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.**

**Recording**

- 19.6. Any statement made should be reported in the individual's own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, keeping any questions to a minimum and they should be of an open format.
- 19.7. Where poor practice is considered to have occurred an incident report will be completed. Where the allegation is in regard to a Club or and FFCF member of staff the appropriate line manager will be required to complete a full incident report with all appropriate information. An internal investigation will be followed and all relevant information will be assessed and reviewed by the Safeguarding Manager and appropriate Line Manager or HR Manager, in order to make a decision about any poor practice that is alleged to have happened.
- 19.8. Investigations into possible abuse will require careful management. In these cases the Safeguarding Manager will first seek the advice of the Football Association Safeguarding Team, the Football League's Head of Safeguarding, Adult Social Care, a Local Authority Designated Officer (LADO) or the Police before setting up an internal investigation and take their advice.
- 19.9. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club or FFCF must provide a report to the FA Safeguarding Department, the Football League Head of Safeguarding and the Club's Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.
- 19.10. Providing it is appropriate to do so the SM will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform the SSM, board and/or trustee level will take place at the Safeguarding Managers earliest opportunity.

**20. Allegations of abuse against members of Fulham Staff**

- 20.1. If an allegation is made about any member of Club or FFCF staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) that could demonstrate that the member of staff in question has:
- behaved in a way that has harmed an adult, or may have harmed an adult;
  - possibly committed a criminal offence against or related to an adult; or
  - behaved towards a adult or adults in a way that indicates he or she is unsuitable to work with adults,

The Safeguarding Manager shall immediately inform the LADO of the Borough where the alleged incident took place so that he or she can consult with the Police and local authority adult's social care colleagues as appropriate. Where the SM is unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

- 20.2. Advice from HR will also be sought and depending on the nature of the allegation, there may need to be consideration for redeployment or even suspension as a neutral act pending

the investigation. This is needed in certain circumstances to protect both the professional from further allegations being made and the adult from being subjected to further risk.

- 20.3. The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. This process would only be carried out once the advice of the above mentioned external bodies had been sought and only then in consultation with the SM.
- 20.4. Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Club's People Management Policy and either general or department-specific Grievance Procedures, insofar as they are applicable.

### **Confidentiality**

- 20.5. There is always tension and caution around issues of confidentiality. The advice for all staff at the Club and FFCF is that there is no guarantee of confidentiality where there are concerns that another individual may suffer harm.
- 20.6. There are actions which staff have to and are obliged to take once we are aware of potential abuse or risk of significant harm. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to a DSO or the Safeguarding Manager.

## **21. Continuous Learning and Development**

- 21.1. The Club and FFCF understands that risk can only be mitigated not eradicated. Therefore it is critical that the Club and FFCF work within a culture of continuous learning in order to ensure a high quality of service provided to all. Where an incident or accident occurs or a complaint is received, the Club and FFCF are committed to investigating, reviewing and evaluating the circumstance and/or event in order to understand what has happened and most importantly what controls can be implemented in order to mitigate the risk of the incident, accident or complaint occurring again. Please refer to the Incident Reporting Policy and Procedure for more information on learning from an accident, incident or complaint.
- 21.2. In order to ensure a proactive approach to the quality of safeguarding practice. The Safeguarding Manager co-ordinates a programme of thematic audits throughout the year, the findings of which are reported to the Clubs Management Board or the Board of Trustees, respectively. Where further learning and improvements can be made, the Safeguarding Manager will lead on a quality improvement plan with the appropriate departmental head.
- 21.3. The Club and FFCF values the continuous development of all staff, volunteers and participants in line with the Safeguarding Strategy in order to increase the capability of their workforce; and to add value to existing service, systems and frameworks in order to ensure safe and effective services for adults who may be at risk.
- 21.4. It is the responsibility of the Safeguarding Manager and Senior Safeguarding Manager to ensure the Club and FFCF are fully compliant with the required annual Safeguarding training delivered by "the League" and "the FA". It is also the responsibility of the Safeguarding Manager, Senior Safeguarding Manager and Designated Safeguarding Officers to ensure the workforce keep up to date with emerging safeguarding and inclusion issues by way of attending workshops, conferences and learning and engaging with current affairs, serious case reviews and other relevant issues.
- 21.5. All staff and volunteers who are working with adults at risk are requested to attend annual Safeguarding Briefings and workshops delivered by the Safeguarding Manager on relevant and up to date subjects in order to keep the participants of all sports programmes safe.

## 22.Safeguarding Contacts

Eleanor Rowland  
Safeguarding Manager  
M: 07876 003298  
E: [erowland@fulhamfc.com](mailto:erowland@fulhamfc.com)

Peter Limbert (SSM)  
General Counsel  
E: [plimbert@fulhamfc.com](mailto:plimbert@fulhamfc.com)

Vicky Peters  
Human Resources  
E: [vpeters@fulhamfc.com](mailto:vpeters@fulhamfc.com)

Lee Hagger  
Academy  
E: [lhagger@fulhamfc.com](mailto:lhagger@fulhamfc.com)

Mark Maunders  
First Team  
E: [tjackson@fulhamfc.com](mailto:tjackson@fulhamfc.com)

Karen Taylor  
Foundation  
E: [ktaylor@fulhamfc.com](mailto:ktaylor@fulhamfc.com)

Katy Shepard  
Disability Programmes Manager  
[kcrombie@fulhamfc.com](mailto:kcrombie@fulhamfc.com)

Jan Seymour  
Staffing / Match day  
E: [jseymour@fulhamfc.com](mailto:jseymour@fulhamfc.com)

Leighton Jones  
Security  
E: [ljones@fulhamfc.com](mailto:ljones@fulhamfc.com)

Steve White  
Safety / Match day  
E: [swhite@fulhamfc.com](mailto:swhite@fulhamfc.com)

Mike McSweeney (SSM)  
Chief Executive Officer  
Foundation  
E: [mmcsweeney@fulhamfc.com](mailto:mmcsweeney@fulhamfc.com)

Nicola Walworth  
Supporter Liaison Manager  
Lead Disability Officer  
E: [nwalworth@fulhamfc.com](mailto:nwalworth@fulhamfc.com)

Eddie Simpson  
Safety Officer  
Match Day  
E: [esimpson@fulhamfc.com](mailto:esimpson@fulhamfc.com)

## 23. External Contacts

FA Premier League  
Jess Addicott  
Head of Safeguarding  
E: [safeguarding@premierleague.com](mailto:safeguarding@premierleague.com)  
T: 0207 864 9000

The Football Association  
Sue Ravenlaw  
Head of Safeguarding Children  
E: [sue.law@thefa.com](mailto:sue.law@thefa.com)  
T/F: 020 7745 4649/5649

The Football League  
Alexandra Richards  
Safeguarding Manager  
T: 01772 325940  
M: 07792 284740

Hammersmith and Fulham Out of Hours  
Safeguarding Adult's Emergency Duty Team (24 hour)  
Tel: 020 8748 8588

Hammersmith and Fulham Social Services  
Adult Protection Team  
Tel: 0208 753 5853  
Email: [h&fadvice.care@lbhf.gov.uk](mailto:h&fadvice.care@lbhf.gov.uk)

THE FA: 0808 800 5000  
Non-Emergency Police: 101  
Emergency: 999

## 24. External Resources

- London Multi Agency Adult Safeguarding Policy and Procedures (August 2016)  
<https://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures/>

- **Safeguarding Adults NHS England (2017)**

<https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>

- **Care Act 2014:**

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

## **25. Date and review**

25.1. This policy is applicable to Season 2018/19 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in July 2019 for use in the following season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.