

SAFEGUARDING RESPONDING TO AND MANAGING ALLEGATIONS POLICY



Policy Purpose

The purpose of this policy and related procedures is to provide a clear and consistent approach for managing allegations made against Club colleagues. It will facilitate a consistent and transparent approach to how allegations made against a member of staff will be dealt with in a manner which is fair to all involved.

Scope

This policy applies to all Norwich City Football Club ("Club") colleagues, including those on temporary contracts, agency workers, consultants, and self-employed contractors.

Policy Statement

The Club is committed to creating a culture in which all concerns (including where the threshold for an allegation is not met) are shared responsibly with the right person, are recorded transparently, and are managed both proportionately and appropriately. Concerns should only be shared with those who need to know and not openly discussed.

This policy should encourage an open and transparent culture and enable the Club to identify concerning, problematic or inappropriate behaviour at the earliest opportunity. It will ensure that individuals working for or with the Club are clear about professional boundaries and act in accordance with the Safeguarding Codes of Behaviour.

This policy will outline the processes to deal with such matters to minimise the risk of abuse.

Introduction

Behaviour which is not consistent with the Club's Safeguarding Code of Conduct, and which does not meet our Club standards and values, must be addressed to ensure that children and adults at risk are kept safe from harm.

It is essential that anyone making a disclosure feels confident, safe, and secure to ensure

that they are given the best opportunity to have their allegation investigated thoroughly and diligently. The Club's response and subsequent actions will have a direct bearing on that person's confidence that they are being taken seriously. This confidence may be instrumental in preventing further abusive behaviour towards that individual or others.

The Club's procedures will ensure that our actions are accountable and our decision-making transparent to demonstrate the highest standards of safeguarding action where practices have been found to be less safe.

Responding to disclosures, safeguarding concerns, and allegations

All disclosures, incidents and allegations must be taken seriously. Doing nothing is never an option.

Colleagues will respond in line with the Club's safeguarding policies and training.

This includes allegations about non-recent abuse and allegations made against deceased individuals.

If colleagues witness an incident or have any concerns pertaining to the safety and welfare of children or adults at risk, they should contact a Designated Safeguarding Officer (DSO), the Safeguarding Department or their supervisor without delay.

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a child or adult at risk's immediate safety.

This should also be considered as an option if a colleague encounters any difficulty contacting a DSO or the Safeguarding Department, or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

The Club will fully support anyone who in good faith reports their concerns about the safety and welfare of children and adults at risk.

What is an allegation?

The term 'allegation' means that it is alleged that a person who works with children or adults at risk has:

- behaved in a way that has harmed, or may have harmed a child or adult at risk,
- possibly committed a criminal offence against or related to a child or adult at risk,
- behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm to them or,
- behaved or may have behaved in a way that indicates he or she may not be suitable to work with children or adults at risk.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they have behaved in a way in their personal life that raises safeguarding concerns.

The Club recognises that it takes extraordinary courage for someone to disclose abuse and the Club will ensure that appropriate action is taken to support and protect the individual making the disclosure.

Colleagues should be aware that children or adults at risk may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

For example, they may feel embarrassed, humiliated, or may be being threatened.

This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to a DSO or the Safeguarding Department if they have concerns about a child or adult at risk. It is also important that staff determine how best to build trusted relationships with children and adults at risk which may facilitate effective communication.

How to respond to an allegation.

a Listen

Colleagues should give their full attention to the person disclosing the allegation and should keep their body language open and encouraging. They should respect pauses and not interrupt the person disclosing the allegation. Colleagues should limit any questioning to the minimum necessary to seek clarification of the circumstances of what has happened and to include dates and times only. When seeking clarification, colleagues should use the language of the person disclosing the allegation to show that it is their experience.

b Reassure

Colleagues should provide reassurance that the person disclosing is being taken seriously and that they are not to blame.

c Views and wishes.

Colleagues should engage the person disclosing as far as possible about how best to respond to their safeguarding situation. They are expected to act in the best interests of children and adults at risk. Advice should be sought from the Safeguarding Department without delay if colleagues are in any doubt about what action to take, including sharing information.

d Safety

Colleagues should ensure that the immediate needs of the person disclosing the allegation are met and should prioritise their safety and protection above all else. This may involve contacting emergency services and/or statutory agencies. The Safeguarding Department must be immediately notified of all such action.

e Act

Colleagues should explain to the person making the allegation what action they

will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, due to a child or adult at risks' age and understanding, or if doing so would place the discloser at greater risk of harm.

Colleagues should refer details of the disclosure of an allegation to the Club's Safeguarding Department. Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic, and other evidence must be preserved.

f Record

Good record keeping is essential safe-guarding practice. It is vital that colleagues:

(i) make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made; and

(ii) make careful notes at the time or as soon as possible after, including dates and times of the incident. Sign them and keep them securely. Colleagues should contact the Safeguarding Department if in doubt about recording requirements.

Colleagues must never:

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person willingly discloses.
- Ask leading questions.
- Give the impression that the person disclosing is to blame.
- Approach the alleged perpetrator of abuse or person whose behaviour and/or actions there are concerns about.

The flowchart in Appendix 1 outlines the steps to be taken by colleagues when dealing with a disclosure, safeguarding concern, or allegation.

Recording information

All incidents, allegations and disclosures should be recorded contemporaneously and uploaded to the My Concern Database as soon as possible.

If colleagues are unable to access My Concern, a written record should include the following information:

- provide a factual account of what they have observed or have been told.
- the date and time of what they have witnessed or been told.
- details of those involved:
 - a person(s) whose safety and welfare there are concerns about,
 - alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about,
 - witnesses
 - any third party who has raised concerns.
- action taken and your rationale for taking these actions.
- date and time of referring the information and to whom the information was referred.
- your details as the referrer.

Colleagues are expected to:

- provide clear, concise, and relevant information.
- record information in an objective and professional manner.
- record information of fact rather than assumption of what you have witnessed or been told.
- record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
- record observations, for example, a description of visible bruising or injuries.

Never ask someone to remove or adjust their clothing to observe any bruises, marks, or injuries. If more information is recalled later, this should be added as an addendum. The original record must not be changed. Colleagues should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

Confidentiality

All disclosures, safeguarding concerns and allegations must be taken seriously. Every effort should be made to ensure that confidentiality is maintained for all concerned. Those who need to know are those who have specific responsibilities to support and protect the child or adult at risk and others who may be at risk.

Examples may include statutory agencies, the Premier League, EFL and FA Safeguarding Teams, parents, and carers.

Communication and media protocols

All media enquiries and communications following any safeguarding concern or about our general safeguarding provision must be approved by the Club's Media and Safeguarding Department to ensure investigations and identities of those involved are not compromised.

Support for colleagues dealing with disclosures

Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of all those involved. It is important that anyone affected seeks help if they feel that they need support.

Club employees have 24-hour access to the Employee Assistance Programme support line via Met Life by calling 0800 012 147 and quoting the reference HA121555.

Volunteers and other colleagues can contact the Club's HR Department for assistance with specific signposting and suggestions for accessing support.

The Charity Mind provide advice and support to anyone experiencing a mental health problem.

Infoline: 0300 123 3393 Email: info@mind.org.uk Text: 86463 Post: Mind Infoline, PO Box 75225, London, E15 9FS

Their Infoline provides an information and signposting service which is open 9am to 6pm, Monday to Friday (except for bank holidays).

Support for colleagues subject to allegations or concerns

When an allegation is made against a colleague that suggests potential for harm to either children or adults at risk, the Club have a duty to support them as well as ensuring the safety of all those involved.

Norwich City understands that these situations can be worrying for colleagues and that the processes can sometimes be protracted.

The Club has responsibilities to:

- manage and minimise the stress caused by the allegation.
- inform the individual as soon as possible, explaining the likely course of action, guided by the Local Authority Designated Officer (LADO), and the police where necessary.
- advise the individual to contact their trade union representative, or a colleague for support.
- appoint a named representative to keep the person informed about the progress of the case.
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

HR staff will be able to provide additional advice and information where required.

Managing safeguarding concerns

Our safeguarding processes are underpinned by statutory guidance to effectively safeguard children and adults at risk. We are committed to working in partnership with key statutory agencies (Health, Social Care, Education and Police), the FA, the Premier League, and the EFL to achieve positive outcomes.

We strive to create a culture where safeguarding responsibilities and procedures for creating safe environments and raising concerns are widely understood and embedded in our values and practices.

All safeguarding concerns will be managed on the secure 'My Concern' or 'Confide' database by trained users. All entries will be timely, accurate and written comprehensively to maintain high levels of accountability and transparency. An ethos of defensible decision making will be demonstrated through users explaining any relevant actions and why they were undertaken.

Referral Thresholds

Police

The Club will contact Police via 101 or online means if a crime has been committed against a child or adult at risk within Club environments. The Club will contact them immediately via 999 if a child or adult at risk is in immediate danger.

Local Authority

If the Club has a concern about a child or children, we will telephone the Local Authority's Children's Advice and Duty Service (CADS) on 0344 800 8021 as a priority action and as soon as is reasonably practicable.

If the Club has a concern about an adult at risk, we will telephone the Local Authority's Adult Social Care Department on 0344 800 8020 as a priority action and as soon as is reasonably practicable.

We will make sure we are prepared with the full details of the child or adult at risk and their family or carers, plus what our concerns are, details of any support we have provided and what we would like to happen before making such report.

We will ensure we gain consent from the parent/carer unless to do so would place the child or adult at risk at further risk of harm or undermine a criminal investigation. If we have

not sought consent from the parent/carer we will inform the Local Authority worker of this and the reason, why. The Club will agree a way forward with the Local Authority worker and they should keep us informed. They should send us a written record of our conversation within 5 working days.

Outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police or for work with Early Help or local Adult Social Care assistance.

We will not investigate such matters and will be led by the Local Authority and/or the Police. We will make careful records of all conversations, including the dates and times of who we spoke to, the information shared, and the action agreed. We will not need to send a written referral.

Full details of these processes can be found at:

norfolkscb.org/people-working-with-children/how-to-raise-a-concern and norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm

The Club understands if we are unhappy about any decisions made by CADS, Adult Social Services, or the MASH we can use the NSCB Resolving Professional Disagreements policy in relation to children, which can be found at:

norfolkscp.org.uk/about/policies-procedures/complaints-and-professional-disagreements/102-resolving-professional-disagreements

or the Adult Social Care Complaints process which can be found at:

norfolk.gov.uk/what-we-do-and-how-we-work/have-your-say/compliments-and-complaints/adult-care-complaints

The Local Authority Designated Officer (LADO) is responsible for management and oversight of all child protection allegations made against staff and affiliated entities who work with children/young people.

Adult Social Care similarly deal with such matters through their 'Speak Up' process.

Where concerns are made about our colleagues, and we believe that the report could demonstrate that the member of staff in question has:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk.
- Possibly committed a criminal offence against or related to a child or adult at risk.
- Behaved towards a child or adult at risk in a way which indicates they may pose a risk of harm to them; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk.

We will refer and consult with LADO or Adult Social Care partners to ensure that correct safeguarding processes are followed and that our practice remains transparent and accountable.

In those cases which pass the Local Authority thresholds, the LADO or Adult Social Care will investigate the circumstances and subsequently adjudicate whether the person involved is suitable for continued work with children or adults at risk.

This matter will be separate to any internal investigation carried out in line with our Disciplinary Policy.

Throughout this process the person involved will be kept fully informed and supported in line with our wellbeing arrangements.

Further information can be found:

[norfolk.gov.uk/children-and-families/keeping-children-safe/local-authority-designated-officer](https://www.norfolk.gov.uk/children-and-families/keeping-children-safe/local-authority-designated-officer)

[norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm/what-happens-after-you-report-a-concern](https://www.norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm/what-happens-after-you-report-a-concern)

Football Authorities

We will make a referral to the FA and Premier League or EFL Safeguarding Unit within 24 hours (or as soon thereafter as practicable) where any concern to or from any external authority (including, without limitation, the Police, Local Authority, DBS, or Charity Commission) about abuse to any child or adult at risk by any of our current, prospective, or former employees, staff members or workers. This also includes allegations of non-recent abuse.

The FA will assess people who may pose a risk of harm and put in place appropriate safeguards. The FA's regulatory framework enables them to act against any affiliated person or organisation that breaches their safeguarding regulations and policies. On an individual level, The FA can deploy risk management measures ranging from education, mentoring and supervision agreements, to interim and permanent suspensions.

These Football Authorities may also participate in safeguarding planning processes, such as LADO or Strategy meetings, commission independent inquiries and provide support to all those involved.

Disclosure and Barring Service

The Club's duty to refer to the Disclosure and Barring Service (DBS) is met when we have dismissed or removed a person from regulated activity (defined in the Safeguarding Vulnerable Groups Act 2006 as amended from time to time) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has been cautioned or convicted for a 'relevant offence'.

A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the children's or adults' barred list.

Engaged in 'relevant conduct'.

'Relevant conduct' is that which endangers or is likely to endanger children or adults at risk.

Satisfied the 'harm test.'

The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm, or may incite another person to harm a child or an adult at risk. Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

Charity Commission

The Charity Commission is the statutory regulator of charities in England and Wales. The Norwich City Community Sports Foundation and the Premier League Charitable Foundation (PLCF) are required to report serious incidents, which include safeguarding issues, to the Charity Commission. Government guidance states that if a serious

incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the police, donors, or another regulator.

The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations. Where there has been abuse or non-compliance, the Charity Commission may require corrective action to be taken by the Trustees, including directing them to take certain actions.

Kick it Out

The Club will refer all racial abuse incidents within the Club environments to Kick it Out in line with existing Premier League or EFL protocols. Kick it Out will provide the necessary support for anyone affected by the incident.

Monitoring and Evaluation

Anonymised reporting of allegations will be regularly reported to our Board of Directors and Board of Trustees. Reporting data will also feature in the annual Safeguarding Report along with any Lessons Learned to develop organisational learning.

Policy Issue Date **September 2020**

Policy Update **May 2022**

Date of Next Update **September 2023**

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Club requirements, or relevant legislation.

CHILD, ADULT AT RISK OR 'SPEAK UP' CONCERN

