



**COMMUNITY
FOUNDATION**

**SAFEGUARDING VULNERABLE
ADULTS POLICY**

INTRODUCTION

AFC Fylde Community Foundation acknowledges and accepts it has a responsibility for the wellbeing and safety of all vulnerable adults who are under the Foundation's care or using the Foundation's facilities. It is the duty of all adults working in the Community to safeguard the welfare of vulnerable adults and create an environment that protects them from harm under the Safeguarding Vulnerable Adults Act 2006.

The wellbeing of vulnerable adults is paramount for all staff and accordingly, it is the Foundation's responsibility to make staff aware of the Safeguarding Vulnerable Adults Policy as part of their induction process. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

A "Vulnerable Adult" is defined as anyone aged 18 or over who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

RULES & REGULATIONS

The Foundation is governed by the rules and regulations set out in the 1989 Children Act and FA Safeguarding Children & Vulnerable Adults Rules. The Foundation is fully committed to ensuring that the best practice recommended by these bodies is employed throughout. The Foundation also has a responsibility to maintain regular dialogue with the Lancashire Safeguarding Children Board.

AIMS & KEY PRINCIPLES

The aims of the Foundation's Safeguarding Vulnerable Adults Policy are:

- To safeguard all vulnerable adults who interact with the Foundation's activities.
- To demonstrate best practice in safeguarding vulnerable adults.
- To develop a positive and proactive welfare programme to enable all vulnerable adults to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout the Foundation's activities

The key principles underpinning this policy are:

- Safeguarding the vulnerable adult welfare is, and must always be, the paramount consideration.
- All vulnerable adults have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- To encourage parents and other members of the vulnerable adult's family to be involved in a relationship with the Foundation.
- To ensure that coaches, parents, and other adults who encounter vulnerable adults provide good role models of behaviour.

SAFEGUARDING VULNERABLE ADULTS

The Foundation has a Designated Safeguarding Lead (Brett Whitehead) who has overall responsibility for the safeguarding of vulnerable adults taking part in Foundation activities. The Foundation also has two Safeguarding Officers (Daniel Monckton & Daisy Sheridan) who reports to the Foundation's DSL who reports to the CEO & the board of trustees. These Officers have special responsibilities and are the focal point for safeguarding vulnerable adults in their nominated area. Anybody with concern about a vulnerable adult's welfare should contact a Safeguarding Officer for advice in the first instance – details can be found at the end of this policy.

HUMAN RESOURCES & DISCLOSURE

Recruitment

As part of the Foundation recruitment and selection process, offers of employment to positions which involve working vulnerable adults are subject to a satisfactory statement of declaration, DBS disclosure and appropriate references. See below for details of the Foundation DBS procedures.

Staff Training

All staff working in direct contact with children shall be required to complete the FA workshop on Safeguarding Children & Vulnerable Adults. Details of those satisfactorily completing this course are retained by the Foundation. Staff not accessing FA Workshop will receive in-house safeguarding awareness training as well as online training on an annual basis.

Health and Safety

The Foundation Health & Safety and Risk Assessment Policy give guidance to those whose roles involve working with vulnerable adults. Where a vulnerable adult is involved, a risk assessment must take account of their particular vulnerabilities, which will include the safeguarding of vulnerable adults. The risk assessment should set out what arrangements are in place for their care and supervision; examples of such risk assessments are kept with the Foundation CEO.

Staff Briefing

A briefing note giving guidance to all employees is available at induction. Whenever possible, staff should avoid situations where they are in one-to-one contact with vulnerable adults.

DISCLOSURE AND BARRING SERVICE (DBS)

The Foundation is registered with the Disclosure & Barring Service (DBS) through GBG. The DBS provides a disclosure service for organisations. DBS disclosures enable employers to undertake more thorough recruitment and selection procedures for positions which involve working with vulnerable adults.

PROCESS FOR DBS CHECKING

New Appointments

All staff who are offered a position which involves working with vulnerable adults will be required to undertake a statement of declaration and enhanced DBS Disclosure. All employment offers are subject to the outcome of the screening process, and when applicable, this is set out in their Offer of Employment. Until such time as their Disclosure certificate has been received, the member of staff will not be left unsupervised with vulnerable adults.

The Foundation is committed to the equal opportunities of its staff and therefore if a positive Disclosure is received it will not result in an instant dismissal from employment.

Should a positive Disclosure be received, a risk assessment will be carried out by the appeal panel to assess the information contained within the Disclosure Certificate. Members of staff may also be asked to attend an interview prior to an employment decision being made.

New Appointments who already have a Disclosure Certificate

In the case of casual employees, if a new member of staff has been DBS checked by their previous employer, the Foundation may not ask that person to undertake another check. However, the original Disclosure Certificate must be shown to the Safeguarding Officer, and it must be dated within six months of the employee's start date.

Existing Staff

Priority is being given to those who encounter vulnerable adults. All staff who have one to one contact with vulnerable adults have been DBS checked.

Temporary Staff and External Consultants

The Foundation will ensure that all temporary staff and external consultants sign a 'Self Declaration Form' and will not have unsupervised access to vulnerable adults during their employment with the Foundation.

Data Protection

The Data Protection policy adopted by the Foundation is in line with current legislation.

Parental Consent

The Foundation will make every effort to obtain parental consent for all activities using the FA template for parental consent form. The Foundation will do everything it can to safeguard vulnerable adults in their care.

Vulnerable Adults who are not picked up on time

The Foundation has procedures in place for vulnerable adults whose parents/carers do not collect them from an activity at a specified time. All parents/carers are made aware that their vulnerable adult should be met no later than 30 minutes after an activity has finished.

Should the vulnerable adult not be collected within 15 minutes, coaching staff have emergency contact numbers and communication with the Foundation office to seek alternative numbers if necessary. In the event that a vulnerable adult is not collected on time, a minimum of 2 coaching staff will wait at the venue until the parent / carer arrives or will escort the vulnerable adult home. If there is no responsible adult available to care for the vulnerable adult, the coach will contact police/social care (numbers listed below).

DBS

In accordance with the procedures detailed above, all staff undergo a DBS check every 3 years.

Activities for Disabled Persons

The Foundation carries out all activities for disabled persons under the guidelines of the Equal Opportunities Policy and in accordance with the Foundation's Equal Opportunities Policy.

GUIDELINES IN THE EVENT OF CONCERN

Highlighting Concern

Although the Foundation is committed to doing the utmost to safeguard vulnerable adults from harm, there may be an occasion when concern is raised over the treatment of a child.

Abuse and neglect' are generic terms encompassing all ill treatment of vulnerable adults as well as cases where the standard of care does not adequately support the vulnerable adult's health or development. Vulnerable adults may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the vulnerable adult.

Recognition – Signs of Abuse

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring, you should contact the DSL immediately.

Physical Abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a vulnerable adult.

Sexual Abuse: Sexual abuse involves forcing or enticing a vulnerable adults to take part in sexual activities, not necessarily involving a high level of violence whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative acts such as rape or oral sex or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also include non-contact activities, such as involving vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways or grooming a vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other vulnerable adults.

Neglect: Neglect is the persistent failure to meet a vulnerable adults basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of a maternal substance abuse. Once a vulnerable adults is born, neglect may involve a parent/carer failing to:

- Provide adequate food, clothing, shelter (including exclusion from home or abandonment)

- Protect a vulnerable adult from physical/emotional harm or danger
- Ensure adequate supervision(including the use of inadequate care-givers) or
- Ensure access to appropriate medical care/treatment

It may also include neglect of, unresponsiveness to a vulnerable adults basic emotional needs.

Emotional Abuse: Emotional abuse is the persistent emotional ill treatment of a vulnerable adult such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a vulnerable adult they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person. It may include not giving the vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on vulnerable adults. These may include interactions that are beyond the vulnerable adult's developmental capability, as well as over protection and limitation of exploring and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Bullying: Bullying is not always easy to define and can take many forms. The three main types are: physical, verbal and emotional including Cyber bullying causing vulnerable adults to feel frightened or in danger, or the exploitation or corruption of vulnerable adults.

For more detailed information on the five main forms of abuse refer to The Football Association Safeguarding Children & Vulnerable Adults Procedures and Practices Handbook.

Further information on the above can be found in the Safeguarding Publication 2014 2015

Radicalisation and Prevent: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

The company, in consultation with the local authority, will undertake Prevent awareness training and ensure that all staff members have access to appropriate training to equip them to identify vulnerable adults at risk of this radicalisation.

If a vulnerable adult is not at immediate risk of harm, where possible, staff must speak to the Safeguarding Officer first to agree a course of action.

The Safeguarding Officer will discuss the case with the Head of Safeguarding to consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority.

The Department for Education also has a dedicated telephone helpline (020 7340 7264) that staff can call to raise concerns about extremism with respect to a vulnerable adult.

You can also email counter.extremism@education.gov.uk. Please note that this is not for use in emergency situations.

Staff must call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group;
- See or hear something that may be terrorist-related.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff must be alert to changes in vulnerable adult's behaviour and take appropriate action outlined above in such instances.

The government's website Educate against Hate <https://educateagainsthate.com> and charity NSPCC have detailed some indicators and signs that a vulnerable adult is being radicalised. The list is not exhaustive but may include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities that they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

vulnerable adults who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Staff should have confidence in their instincts and seek advice from the Safeguarding Officer if something feels wrong.

RESPONDING TO A REPORT OR SUSPICION

Where possible the Safeguarding Officer or Designated Safeguarding Lead should be contacted as early as possible, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Do:

- Treat any allegations extremely seriously and act at all times towards the vulnerable adult as if you believe what they are saying.
- tell the vulnerable adult they are right to tell you.

- reassure them that they are not to blame.
- be honest about your own position, who you have to tell and why.
- tell the vulnerable adult what you are doing and when, and keep them up to date with what is happening.
- take further action – you may be the only person in a position to prevent future abuse.
- write down everything said and what was done, sign and date.
- seek medical attention if necessary.
- inform parents/carers unless there is suspicion of their involvement.

Don't:

- make promises you cannot keep.
- interrogate the vulnerable adult – it is not your job to carry out an investigation – this will be up to the police and social services, who have experience in this.
- cast doubt on what the vulnerable adult has told you, don't interrupt or change the subject.
- say anything that makes the vulnerable adult feel responsible for the abuse.

DOING NOTHING IS NOT AN OPTION, IT IS YOUR RESPONSIBILITY TO ACT –
 Make sure you tell the Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

RECORDING ALLEGATIONS OR SUSPICIONS

The Safeguarding Officer will ask for a written factual statement from the person making the report.

If the report involves an allegation about another member of staff, that person will also be asked to write a brief report, sign and date it. Any statement made by the vulnerable adult should be reported in their own words, signed and dated. These reports should be confined to facts and should not include any opinion, interpretation or judgement.

The Foundation will ensure that any vulnerable adult concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. The Safeguarding Officer should seek the advice of The Football Association Safeguarding Children & Vulnerable Adults Team, Social Care Children's Duty team, LADO (Local Authority Designated Officer) or the Police before setting up an internal inquiry and take their advice on informing the child or young person's parents. In any case of suspected abuse, as soon as the local Social Care Department has been informed, the Foundation must provide a report to the FA Head of Safeguarding Children & Vulnerable Adults.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at the Foundation is that no guarantee of confidentiality can be given to a vulnerable adult but in a safeguarding vulnerable adult protection incident confidentiality is over ridden.

A vulnerable 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.

There are actions which staff have to and are obliged to take once we are aware of a problem. 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 a safeguarding vulnerable adult issue to the Safeguarding Officer or Head of Safeguarding. The key issue is that the welfare of the vulnerable adult is protected.

Internal

Chief Executive Officer	Chris Brannigan chris.brannigan@afcfylde.co.uk
Deputy Chief Executive Officer & Designated Safeguarding Lead	Brett Whitehead brett.whitehead@afcfylde.co.uk 07985213010
Designated Safeguarding Officers	Dan Monckton (Schools/Camps) dan.monckton@afcfylde.co.uk Daisy Sheridan (Community) daisy.sheridan@afcfylde.co.uk

External

FA Safeguarding Team	0800 169 1863 ext. 4809 safeguarding@thefa.com
NSPCC Helpline	0808 800 5000 (24 hours)
Police	Emergency 999 Non-emergency 101 https://lancashire.police.uk/
CEOP Reporting mechanism for inappropriate behaviour/grooming in an online environment.	www.ceop.police.uk/safety-centre

VULNERABLE ADULTS WITH SPECIAL NEEDS AND/OR DISABILITIES

Medical information – Best Practice

Within the Safeguarding Policy the Foundation identifies the need for a medical and consent form completed by the parent or carer.

This is also an opportunity to include any other individual needs or difficulties. Players and their parents and carers should be encouraged to complete this section honestly – disability or other health needs does not necessarily prevent someone participating in football, indeed football is committed to making the game accessible to everyone and will take positive steps to ensure every effort is made to meet those needs.

In order for players to have confidence in this Policy and be honest the Foundation will endeavour to identify and promote role models within the game. In addition players will be assured that with full information they will be better able to ensure that the player will be able to meet their full potential and not compromise their health thereby increasing the time they are able to enjoy playing football.

The Foundation has a medical form that gathers the required information with additional information on any changes in the vulnerable adults life situation that may cause a change in behaviour e.g. death of a relative, divorce.

Remember, some disabilities such as asthma may require minimal or no specific action by the Foundation's staff. However, the knowledge of that disability will allow staff to have an awareness of what action to take in an emergency i.e. a severe asthma attack brought on by an injury or incident.

Assessment of need – Best Practice

From the information received on the medical form, and through discussion with parents or carers, the Foundation staff can identify how to best meet the vulnerable adults needs to enable them to access the football in full.

Below are some points to consider in completing an assessment of need:

- Does the club/venue have adequate access for the vulnerable adult?
- Does the club/venue have the required facilities?
- When playing away matches does the host club have required access/facilities?
- Does the club have the required staff trained?
- Does the young person need additional help from a “support person” to access the Football?
- What aids are required and can the club provide them. Do the parents have aids that can be used? i.e. specialist wheelchairs (charities can help with this).
- Does the vulnerable adult need personal care and if so who will provide it?
Medication – see above
- What advice can the parent/carer give to avoid/deal with possible problems in behaviour?
- What, if any, support services are provided by the local authority or other agencies to enable them to participate in everyday activities including education? Ask for consent from the parent/carer to seek advice or support from these sources
- How will the club ensure the disabled vulnerable adult is safeguarded from harm or injury while in the venue?
- Is an agreement with parents on attending the venue during sessions required?
- What action should be taken if a medical emergency occurred relating to any disability?

It has to be recognised that some medical conditions can be hard to manage in a mainstream club if they place other members at risk of harm. Such decisions to exclude or refuse membership must be taken in line with appropriate guidance from the Foundation's Safeguarding Officer and the Safeguarding guidance. In some cases specialist clubs such as Wheelchair organisations may provide the best solution.

DIFFERENT TYPES OF DISABILITY – STAFF GUIDENCE

Chronic illness

Among the more common are asthma, allergies, diabetes, epilepsy, sickle cell anaemia or thalassaemia. Being diagnosed with a chronic medical condition presents many challenges for both the disabled child and their families. For parents, having access to information, treatment options and related resources such as football, can make a significant difference in their quality of life. Health issues such as severe asthma, diabetes and epilepsy, are likely to require the vulnerable adult to have regular medication.

The Club Welfare Officer and appropriate coaches must be aware of what medication is prescribed as well as what action to take if the disabled vulnerable adult becomes unwell. The Foundation must ensure that, while supporting the disabled vulnerable adult and parent or carer, they do not overstep what is appropriate for the Foundation to undertake in terms of care.

Knowledge of what to do and how to cope in an emergency is always important but it may be considered necessary that, in order to safeguard the young person, a parent or other responsible adult should always be in attendance.

For those illnesses where reaction time is vital, a plan should be developed with the disabled vulnerable adult and parent/carer to deal with emergencies so that a clear line of action and responsibility can be followed.

It may be appropriate, *only with the expressed permission* of the individual concerned and their parent or carer to share some information in order to raise awareness and challenge myths and fears among their peers or club staff.

For example, a young person with diabetes may be required to inject insulin and they may prefer to make this explicit to their peers rather than risk being caught injecting insulin with the risk of misguided assumptions about drug abuse! Safe arrangements should be made for storage of medication if the parent/carer is not present throughout activities.

Autistic Spectrum Disorders (ASD)

There are a group of lifelong developmental disabilities, affecting how a person relates to or communicates with other people. Vulnerable adults with Autistic Spectrum Disorders experience difficulties known as “the triad of impairment – social interaction, social communication and imagination”.

The National Autism Society recognises that “the prevalent rate of ASD of 1 in 110 indicates that all services should expect to come into contact with vulnerable adults on the spectrum”. In football we need to recognise that ASD can cause problems not only for the individual concerned but for both fellow team members and coaches that are involved with them. It has to be remembered that this is not an issue of “poor behaviour” but a behaviour pattern that is part of ASD.

The Foundation will need to look at what they can and can't provide to meet an individual vulnerable adults needs and complete a risk assessment with a decision on whether that risk is acceptable and manageable, and allows the Foundation to safeguard the needs of both the individual concerned and the Foundation members to whom the

club has a duty of care.

Attention Deficit Hyperactivity Disorder (ADHD) & Tourette's Syndrome

Attention deficit hyperactivity disorder (ADHD) and attention deficit disorder (ADD) refer to a range of behaviours associated with poor attention span including impulsiveness, restlessness and hyperactivity, as well as inattentiveness, and may make it more difficult for vulnerable adult/disabled persons to learn or obey instructions and also cause misunderstandings when socializing. Tourette's syndrome is often linked to or part of the symptoms of ADHD. Tourette's may cause vulnerable adult/disabled persons to use inappropriate and verbally abusive words in an uncontrolled and unintentional manner. The Foundation will need to liaise with parents/carers and possibly professionals who help the player outside the club to draw up a plan to support the player within the club. The plan will need to be agreed by all concerned, e.g. coaches, parents and the vulnerable adult/disabled persons.

Learning Disabilities

Vulnerable adults with learning disabilities may require more help to learn new skills. Coaches need to be made aware of the player's disability so that they understand that the vulnerable adult may need more help to participate in training sessions and games. It is important that parents communicate with the club to prevent assumptions being made that the vulnerable adult is being disruptive or naughty.

Progressive or Potentially Terminal Illnesses

With vulnerable adults with progressive illnesses such as cancer, it is important to ask open questions that will allow the vulnerable adult and their parents or carer to share information openly about any progressive illnesses that may be active or in remission but could have an impact in terms of possible health and safety issues. Progressive illnesses by their very nature are likely to change with time. The vulnerable adult's ability to take part in activities may become more limited and more specialist provisions may be required to enable them to take part. For example a vulnerable adult being able to maintain his/her involvement with the Foundation for as long as possible may be of primary importance following a diagnosis of a potentially terminal illness such as cancer.

Learning Disabilities UK - www.Learningsisabilitiesuk.org.uk

National Autism Society - www.nas.org.uk

Tourette's Syndrome (UK) Association - www.tsa.org.uk

The British Dyslexia Association - www.bdadyslexia.org.uk

Attention Hyperactivity Deficit Disorder - www.adhd.org.uk

Asthma UK - www.asthma.org.uk

British Deaf Footballs Council - www.britishdeaffootballscouncil.org.uk

Diabetes UK - www.diabetes.org.uk

National Deaf Vulnerable adult/disabled persons' Society - www.ndcs.org.uk

EFDS Head Office – www.efds.co.uk

Mencap Football – www.mencap.org.uk

USE OF IMAGES

The Foundation takes its guidance on the use of images from guidelines issued by the FA and Premier League. All photographs are taken by persons who have been briefed by the Activity Manager responsible for the activity being photographed.

- Before taking photographs of vulnerable adults, parental/carer consent is sought in writing prior to the event. Parents/carers are responsible for informing the head coach of any change of circumstances which may affect consent.
- Parents and carers will be informed of how the image will be used. The head coach will not allow an image to be used for something other than that for which it was initially agreed.
- All vulnerable adults featured in publications will be appropriately dressed. Where possible, the image will focus on the activity taking place and not a vulnerable adult.
- Designated photographers will undertake a DBS check, attend a Safeguarding Vulnerable Adults workshop and will be personally responsible for keeping up to date with the latest guidelines on the use of Images. Identification should be worn at all times
- Vulnerable adults who are under a court order will not have their images published in any document.
- No images of vulnerable adults featured in publications will be accompanied by personal details such as their school or home address.
- Any instances of inappropriate images in football should be reported to the SO of the Foundation in the first instance and from there the Head of Safeguarding must be informed.

CODE OF PRACTICE

1. What are images of vulnerable adults? Why have a Code of Practice?

Images are all photographs taken on film or digital cameras (including mobile phones) and all sorts of moving pictures.

There has been much talk about whether it is safe to have images taken of vulnerable adults participating in sport. Whilst the great majority of images are appropriate and are taken in good faith, it is a fact that images can be misused and vulnerable adults can be put at risk if common - sense procedures are not observed.

2. Aims of the Code of Practice

First, as in all matters concerned with the vulnerable adults, the aim is to help the Foundation's projects establish and develop good practice.

Second, the Code will help the Foundation's projects avoid three potential sources of abuse

- the use, adaptation, or copying of images for child abuse, either on the Internet or in print. www.ceop.gov.uk
- the possible identification of a child when an image is accompanied by significant personal information which can lead to the vulnerable adult being 'groomed'.
- the identification and locating of vulnerable adults where there are safeguarding concerns. Such cases would include, for example, vulnerable adults who could be compromised by an image because

- they are removed from their family for their own safety
- there are restrictions on their contact with one parent following a parental separation
- they are a witness in criminal proceeding

3. The Code of Practice – general considerations

The Foundation and Foundation's projects should:

- communicate as widely as possible their approach to the recording of images, saying that its policy is designed to encourage best practice in the safeguarding of vulnerable adults and to prevent abuse if possible
- make sure parents, carers and vulnerable adults are told about the Foundation's Social Media Policy before the vulnerable adult participates in an activity.
- get parents' or carers' consent to take images of the vulnerable adult for the purposes of the Activity.
- report any instances of inappropriate images to the contacts listed at Paragraph 3 of this document.

The Foundation and Foundation's projects should not:

- publish images with the full name(s) and details of the individual(s) in the their programme or place images containing that information either on the their website or in the press
- use an image for something other than that which it was initially agreed, e.g. published in the press when initially produced for a personal commemorative picture
- allow images to be taken by anyone in changing rooms, showers and toilets or anywhere else where vulnerable adults might be undressed.

The Foundation and Foundation's projects should remember:

- it is not an offence for someone to take appropriate photographs on public property, even if asked not to do so
- The Foundation projects cannot decide who can and can't take images on public property
- The Foundation projects can decide who can and can't take images on private property. If photographers do not comply with these requirements, then they may be asked to leave

4. The Code of Practice – the photographers

The aim of each photographer should be to help celebrate and promote football.

When taking an image they should be asked to

- focus on the activity rather than the individual vulnerable adult
- include groups of vulnerable adults rather than individuals if possible
- ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- represent the broad range of vulnerable adults participating in football - boys and girls, disabled people, members of minority ethnic communities.

(a) Professional photographers and Foundation Staff

(i) Designated Vulnerable Adults Photographers

One or more professional photographers engaged by the Foundation who take images of vulnerable adults engaging in specific activities should be listed as Designated Vulnerable Adults Photographers.

To achieve this

- The Foundation should invite them to apply for inclusion in their list of Designated Vulnerable Adults Photographers, explaining to them that they will be screened and trained by them on safeguarding children matters before they are placed on the list.
- The Foundation should screen applicants for their suitability (just as they would check any other member of staff or volunteer working with vulnerable adults) and then provide training for them in their Safeguarding Vulnerable Adults policies and procedures.

(ii) The Designated Vulnerable Adults Photographer's instructions

The Designated Vulnerable Adults Photographer (whether a professional photographer or member of Staff) should receive clear instructions, preferably in writing, from the head coach at an early stage.

- The Foundation should provide them with a clear brief about what is appropriate in terms of content - images should not be allowed to be taken outside the activity being covered.
- The Foundation should determine who will hold the images recorded and what is to be done with them.

(b) Parents, relatives, friends and the vulnerable adults themselves

Parents, relatives and friends may want to take their own images of “their” vulnerable adult at the Activity - and the vulnerable adult too may want to take his/her own record.

It should always be made clear to them that no image taking at all is permitted in vulnerable adults changing rooms, showers and toilets and that, in connection with this, all mobile phones carried by vulnerable adults must be switched off in such accommodation.

In other activities, it is very difficult to control image taking by parents/carers etc but good practice can be encouraged by the provision of simple written information given to everyone.

The Foundation’s projects should decide whether, when and how parents, carers, family, friends should be permitted to take images of the vulnerable adult.

SAFEGUARDING FOR INTERNET AND OTHER E-TECHNOLOGY

Staff/Volunteers/ Parents’/Carers’ Fact Sheets

1. Know what your vulnerable adults are doing online and who they are talking to. Ask them to teach you to use any applications you have never used. Keeping the computer in a family room means that you can share your vulnerable adults online experience – and that they are less likely to act inappropriately (i.e. via webcam).
2. Help your vulnerable adults to understand that they should never give out personal details to online friends — personal information includes their messenger ID, email address, mobile number and any pictures of themselves, their family or friends. If you’re vulnerable adults publishes a picture or video online, anyone can change it or share it. Remind them that anyone may be looking at their images and one day a future employer could!
3. If your vulnerable adults receives spam/junk email & texts, remind them never to believe them, reply to them or use them. It’s not a good idea for your vulnerable adults to open files that are from people they don’t know. They won’t know what they contain — it could be a virus, or worse — an inappropriate image or film.
4. Help your vulnerable adults to understand that some people lie online and therefore it’s better to keep online mates online. They should never meet up with any strangers without an adult they trust.
5. Always keep communication open for a vulnerable adult to know that it’s never too late to tell someone if something makes them feel uncomfortable.
6. Teach young people how to block someone online and how to report them if they feel uncomfortable.

Acknowledgement:

For further information, please look at www.ceop.gov.uk and www.ThinkUKnow.co.uk

Advice adapted and acknowledged: Childnet: www.childnet.com

It's important to recognise that social sites are fun and offer great possibilities for vulnerable adults, there are potential risks including cyberbullying, inappropriate sexual contact with children and young people and the misuse of personal information.

Social networking sites, alongside sites which enable users to put up their own pictures, text and videos (known as user-generated content) such as YouTube, blogging sites, and interactive games sites for example are part of a social and technological revolution that is known as Web 2.0. Web 2.0 is characterised by the ease with which anyone can produce and publish their own content and link with others.

Vulnerable adults especially love this new environment because they can have a powerful voice to express their identity and opinions and many are using it to good effect. For example, some musicians and bands have launched themselves entirely on the strength of this new stage and all this is for free and with just one password – is it any wonder why young people love it?

Social networking sites, such as Twitter, Instagram and Facebook, are very popular with vulnerable adults, even those as young as 8 and 9. These types of sites allow vulnerable adults to be incredibly creative online, keep in touch with their friends and express themselves using a whole range of different media and applications such as video, photos, music, and chat.

Increasingly vulnerable adults are able to access and use these applications on the go through mobile and gaming devices, where they are away from supervision, enabling the instant publishing of pictures.

What sometimes appears as a private space for a vulnerable adult can become public very quickly and this blur between public and private expression can potentially put a vulnerable adult at risk in two main ways:

It is not easy talking to a young person about their social networking online or offline. Vulnerable adults often think of these sites as their private domain, in much the same way as they would a personal diary and address book. However because of the public nature of this environment and because young people have been hurt by inappropriate behaviour in these spaces, it is important that they understand the risks and are able to safeguard themselves with the help and support of others.

INTERNET SAFEGUARDING ADVICE FOR VULNERABLE ADULTS

SAFE: Keep safe by being careful not to give out personal information – such as your full name, e-mail address, passwords, phone number, home address, photos or school name – either to people you are chatting with online or by posting it online

where other people can see it.

MEETING: Meeting someone you have only been in touch with online can be dangerous. Only do so with your parents' or carers' permission and even then only when they can be present.

ACCEPTING: Accepting e-mails, Instant Messenger (IM) messages, or opening files, pictures or texts from people you don't know or trust can lead to problems – they may contain viruses or nasty messages!

RELIABLE: Information you find on the internet may not be true, or someone online may be lying about who they are.

TELL: Tell your parent, carer or a trusted adult if someone or something makes you feel uncomfortable or worried, or if you or someone you know is being bullied online.

Sample Images information letter for parents/carers

(The Foundation headed paper)

Dear Parent/Carer

Images of your (person's name) at (name Activity)

We like to celebrate (person's name) participation in activities at (insert name of Activity) with appropriate images and we have a number of people who are designated as official photographers for this purpose. We also have some simple rules about taking images – photographs and videos, whether on film or digital - which are set out in this letter.

Please note that we do not allow any image taking by anyone at all in changing rooms, showers and the toilets, and that for this reason we require mobile phones to be switched off when they arrive.

Consent

We will only have images taken of a child if parents and carers give consent – please use the attached form to do this and return it to (enter name and contact detail).

Obtaining images

If you want to obtain pictures of the person at (Activity) please ask us if and when they will be available.

In other Activities, it is sometimes possible for you, your family and friends to take your own images of the person but please ask if you want to do this – and please respect our decision.

While children are taking part in their activity at (Activity) they shouldn't be carrying valuables with them – that includes cameras and mobile phones.

(a) Official” images - our Designated Photographers

Normally we use only Designated Photographers – people who have been screened and specially trained, who are either professional photographers or members of the staff.

(b) “Unofficial” images – taken by parents, carers, family, friends

(c)

If the person’s activity is not at the Club’s Training Ground/Centre of Excellence/Football Development Centre and you want to take your own unofficial images, please ask. If it is possible, we’ll let you know when and where you can take them.

However, we can’t always say “yes” to image taking and we ask you to respect our decision if we are unable to allow it.

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