

TOTTENHAM HOTSPUR FOOTBALL CLUB

Safeguarding Adults Policy

Foreword

This Safeguarding Adults Policy (the “**Policy**”) reflects the ethos of Tottenham Hotspur Football and Athletic Co. Limited (trading as “**Tottenham Hotspur Football Club**”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “**Foundation**”) and Tottenham Hotspur Women Football Club Limited – together the “**Club**”.

The Board of Directors of the Club share commitment to safeguard and simultaneously promote Adult wellbeing. This includes, where appropriate, having regards for the views, wishes, feelings and beliefs of Adults and Adults at Risk when deciding on any action.

The Club is committed to working in partnership with the Football Association, the Premier League and relevant statutory and regulatory agencies to ensure that information and training opportunities are available to all Staff to ensure best practice when working with Adults and Adults at Risk. Adopting best practice will help to safeguard Adults and Adults at Risk from potential Abuse as well as reducing the likelihood of concerns being made about Staff and other adults in positions of responsibility within the Club.

Matthew Collecott

STRATEGIC SAFEGUARDING LEAD

Operations & Finance Director

Board of Directors of Tottenham Hotspur Football & Athletic Co. Ltd

Effective Date of Policy: April 2024

Policy Owner/Lead: Head of Safeguarding and Welfare

Review Date: April 2025

IMPORTANT: if you have a Concern that an Adult or Adult at Risk is in immediate danger, or needs immediate medical attention, stop reading this policy and call 999.

Staff must report any Concerns or examples of poor practice to the Safeguarding Team immediately and within 24-hours.

Staff are not expected to be experts at recognition of Abuse. However, they do have a responsibility to act if they have any Concerns about the behaviour of someone towards an Adult or Adult at Risk and to follow the reporting procedures in this Policy. Examples of poor practice include:

- failure to act when you witness possible Abuse, Bullying or Neglect;
- spending excessive amounts of time alone with an Adult at Risk away from others;
- using inappropriate language;
- making sexually suggestive comments;
- allowing Concerns to go unchallenged, unrecorded or not acted upon;
- harassment of an Adult at Risk because of their protected characteristics;
- not meeting the needs of an Adult at Risk e.g. training without a necessary break; and
- sending sexually explicit messages or images to an Adult at Risk.

Staff must maintain an attitude of “it could happen here”. Some common signs that there may be something concerning happening in an Adult or Adult at Risk’s life include:

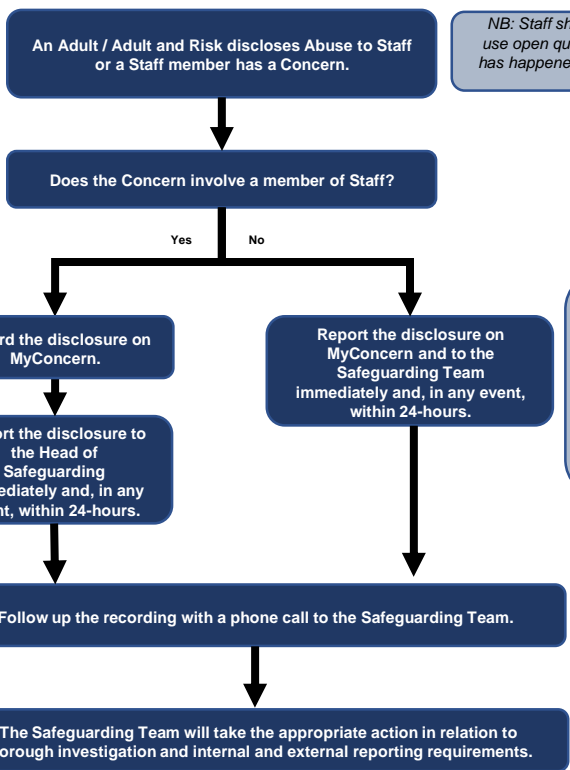
- unexplained changes in behaviour or personality;
- becoming withdrawn;
- seeming anxious;
- becoming uncharacteristically aggressive;
- unexplained bruises or injuries – or a lack of medical attention when an injury is present;
- belongings or money going missing;
- not attending or no longer enjoying their sessions or work;
- losing or gaining weight, an unkempt appearance e.g. a deterioration in hygiene;
- indicators of self-harm;
- a fear of a particular group of people or an individual; and/or
- telling you or another person that they are the victim of Abuse.

It is important to make sure an Adult at Risk has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened. The following are principles to follow about when and how we can make decisions for people who do not have Capacity:

- only make decisions for other people if they cannot do that for themselves at the time the decision is needed;
- if the decision can wait, wait;
- when making a decision for someone else then we must make the decision in their best interests; and
- if the action we are taking to keep people safe will restrict them, we must think of the way to do that which restricts to their freedom and rights as little as possible.

It is not the responsibility of Staff to decide if an Adult or Adult at Risk is being subject to Abuse, but it is the responsibility of all Staff to act on any Concern by reporting it to the Safeguarding Team.

Reporting a Concern Flowchart



NB: Staff should listen to what they are told, use open questions to learn more about what has happened, and take accurate and detailed notes.

NB: where possible a report should include the following information:

- The Adult / Adult at Risk’s details (name, age, address);
- What the Adult / Adult at Risk has said / done that gave rise to the Concern.
- Any information about the alleged abuser.

NB: Staff only share the information on a need-to-know basis and should not discuss with colleague, friends or family.

NB: where possible, the Safeguarding Team will always seek the consent of the individual before sharing with external agencies.

Introduction

This Policy reflects the safeguarding vision, values and strategy of the Club.

The Club is dedicated to taking all reasonable steps to make it as difficult as possible for any form of Abuse of Adults or Adults at Risk to take place in both physical and online environments and this Policy forms part of those efforts to ensure that safeguarding is firmly embedded in the values and practices of the Club and its Staff.

Policy Statement

The Club is committed to operating best practice safeguarding procedures and to uphold the rights of all Adults to live a life free from harm from Abuse, exploitation and Neglect.

The Club is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution. In doing so, the Club wants to create an environment in which Adults and Adults at Risk feel safe and free from any risk of Abuse and engender a responsibility to promote the welfare of Adults and Adults at Risk amongst all Staff at the Club.

The Club believes that everyone has the right to live free from Abuse or Neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

The Club recognises that health, well-being, ability, Disability and the need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

The Club recognises that there is a legal framework within which sports need to work to safeguard Adults who have needs for care and support and for protecting those who are unable to take action to protect themselves. The Club will act in accordance with the relevant safeguarding Adult legislation and with local statutory safeguarding procedures.

The Club is committed to creating a culture of zero-tolerance towards Abuse to Adults and Adults at Risk, which necessitates:

- the recognition of Adults who may be at risk;
- contexts and conditions which may increase risk;
- knowing how Abuse, exploitation or Neglect of Adults manifests itself; and
- being willing to report safeguarding Concerns.

This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person's own home and in any care setting.

In light of these commitments, the objectives of this Policy are to enable and empower all Staff with the necessary information to carry out their moral, legal and regulatory responsibilities, which contribute to the protection, and wellbeing of all Adults and Adults at Risk under the Club's care.

The Club will do this through its continuous commitment to educate Staff, safer recruitment processes and engendering a "vigilant and listening culture", whereby Staff understand and are demonstrably committed to the organisational ethos of safeguarding and protecting Adults and Adults at Risk. The Club will also build and maintain a culture of accountability that drives continuous improvement; creates and reinforces attitudes and behaviours that value Adults and Adults at Risk; as well as develop, implement and review

detailed safeguarding arrangements; and maintain a Strategic Safeguarding Lead who will have overall responsibility for safeguarding at the Club.

The Club undertakes to make available (on request) electronic copies of this Policy as amended from time to time to stakeholders. Electronic copies of this Policy are available on the [website](#) (the “**Website**”). The Website will also contain contact details in the event that: (i) any person is unable to download this, Policy; and/or (ii) any person requires this Policy in another form, for example, in braille or large print. All requests will be considered on their merits on a case-by-case basis. In circumstances where an individual has been classified as having an intellectual impairment, the Club shall use reasonable endeavours to communicate the contents of this Policy to such individual in the most appropriate manner.

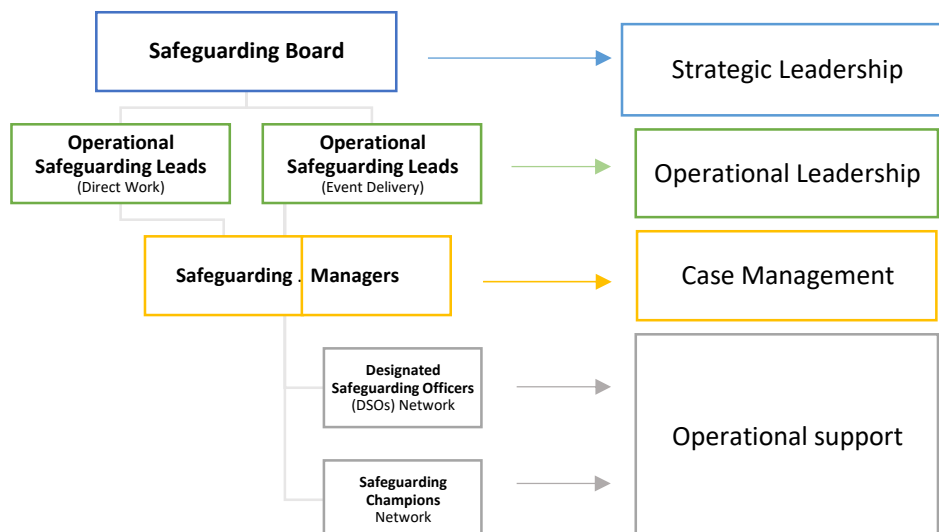
The Club has a dedicated “**Safeguarding Team**” with primary responsibility for working with Staff to provide guidance and support in relation to any safeguarding Concerns or queries.

The Club’s board of directors is committed to raising safeguarding awareness and communicating policies and procedures as well as driving the Club’s culture of vigilance and action. In furtherance of this commitment, the Club maintains effective lines of communication between its board of directors and the Safeguarding Team.

The Club's board level Strategic Safeguarding Lead is Matthew Collecott, who oversees the Club's safeguarding arrangements and procedures.

Any Club-wide Concerns can be addressed to any member of the wider Safeguarding Team via the contact details contained within the table below. Other helpful external agency contact details are contained within **Appendix 1**.

Club Safeguarding Team:	safeguarding@tottenhamhotspur.com
Foundation:	Natalee Hibbert 07384 258 758 natalee.hibbert@tottenhamhotspur.com
Women & Girls:	Sandra Barratt 07384 818062 sandra.barratt@tottenhamhotspur.com
Academy:	Tim Ford 07392080266 tim.ford@tottenhamhotspur.com
Global Football Development:	Lauren Cotton 07384117643 lauren.cotton@tottenhamhotspur.com
Club/Foundation/Match & Event Day and concerns about practice of staff:	Shauna McAllister 07879997839 shauna.mcallister@tottenhamhotspur.com



Definitions and Rules of Interpretation

The following definitions apply in this Policy:

- Abuse:** is any form of harm or maltreatment of an Adult or Adult at Risk. There are four main types of Abuse: Emotional Abuse, Physical Abuse, Sexual Abuse and Neglect. Other forms of Abuse may include Discriminatory Abuse, Psychological Abuse, or financial abuse;
- Adult:** means anyone over the age of 18 years old;
- Adult at Risk:** means any person aged eighteen or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, Abuse or Neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of Abuse or Neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical and/or mental or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence. An individual’s level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time;
- Bullying:** a form of Emotional Abuse whereby an Adult or Adult at Risk is discriminated against;
- Capacity:** the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision, unless it can be established that they lack capacity (Mental Capacity Act 2005);

Concern:	fear, worry or concern that an Adult or Adult at Risk may be at risk of Abuse;
Cyber Bullying:	a form of online Emotional Abuse whereby an Adult or Adult at Risk is discriminated against;
Data Protection Legislation:	all applicable laws relating to data protection, the processing of personal data and privacy, including: the Retained EU law version of the General Data Protection Regulation ((EU) (2016/679)) (“ UK GDPR ”) and the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications), and any other data protection and/or privacy legislation applicable in the UK from time to time, (each as amended, updated, replaced or re-enacted from time to time and including all subordinate legislation made from time to time under or giving effect to the same) and references to “controller”, “personal data”, “special category data”, “process”, “processing” and “supervisory authority” have the meanings set out in, and will be interpreted in accordance with, such applicable laws;
Disability:	means physical or sensory impairment or learning impairment which has a substantial or long-term effect on the ability to carry out normal day-to-day activities;
Discriminatory Abuse:	including racist abuse, sexist abuse, abuse based on an Adult or Adult at Risk’s disability or other protected personal characteristic as defined in the Equality Act 2010, as well as other forms of harassment, slurs or similar unfair treatment;
Duty of Care:	description of the responsibility all staff have for the welfare and safety of its beneficiaries, and the reasonable steps taken to ensure their safety and protection;
Emotional Abuse:	the persistent emotional maltreatment of an Adult or Adult at Risk such as to cause severe and persistent adverse effects on the Adult or Adult at Risk’s emotional development;
Extremism:	means the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs;
Football Authority Regulations:	the rules and regulations from time to time in force of any Governing Body, national association or league under the auspices of The Football Association and/or the Premier League to the extent that they relate or apply to the Club;
Gross Misconduct:	means an action that destroys the relationship of trust between an employer and an employee;

Neglect:	the persistent failure to meet an Adult at Risk's basic physical and/or psychological needs, likely to result in the serious impairment of the Adult at Risk's health or development;
Physical Abuse:	a form of Abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an Adult or Adult at Risk;
Picture of Need:	means the combination of more than one concern for the same person. Each isolated concern may appear mild, however when viewed as a whole, may warrant a more urgent response;
Positions of Trust:	means roles where the post holder has power and authority and may have key influence in the life of others;
Premier League:	professional football's highest recognised league in England;
Radicalisation:	means the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups;
Sexual Abuse:	forcing or enticing an Adult or Adult at Risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the Adult or Adult at Risk is aware of what is happening without consent. The activities may involve physical contact as well as non-contact activities, such as grooming;
Staff:	any person acting for or on behalf of the Club in an official role whether as an employee, volunteer, casual workers or staff, consultant or otherwise;
Terrorism:	an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause;
The Football Association:	the national governing body of football in England; and
Vulnerability:	being susceptible to additional risks of harm or Abuse including which could include their ethnicity, gender, age, religion, disability, sexual orientation, social background, special care needs, support, or protection.

Application of the Policy

This Policy applies to all Staff. All Staff under the jurisdiction of the Club agree to abide by all Club policies and procedures as in place from time to time including this Policy.

We expect our partner organisations, including for example, affiliated clubs, suppliers and sponsors to adopt and demonstrate their commitment to the principles and practice as set out in this Policy and associated procedures.

Power to change, rescind or add to the provisions of the Policy

In the event an issue arises that is not foreseen in this Policy, it will be addressed by the Club in a manner that protects and promotes the objectives identified in this Policy.

Laws

The laws of England and Wales shall apply to this Policy.

Staff responsibilities

In addition to the duties and obligations arising under any other contracts, policies or procedures under which they may be subject, all Staff shall:

- a) accept the moral, legal and regulatory responsibility to provide a Duty of Care for Adults and Adults at Risk, to safeguard their wellbeing, and to protect them from Abuse;
- b) respect and promote the rights, wishes and feelings of Adults and Adults at Risk;
- c) recognise that some Adults may face additional barriers to getting help because of additional Vulnerabilities. There should be awareness that these characteristics may mean that they are at greater risk of Abuse because of factors such as prejudice, discrimination, reduced ability to resist or report Abuse, communication barriers or myths based on stereotypes;
- d) respond appropriately to any Concerns; and
- e) read, accept and abide by this Policy as well as all other Club policies and procedures as in place from time to time including:
 - i. Managing Allegations Against Staff Policy;
 - ii. Safeguarding Code of Conduct;
 - iii. Disclosure and Barring Service Policy;
 - iv. Safer Recruitment Policy;
 - v. Safeguarding Children Policy;
 - vi. Anti-Corruption & Bribery Policy;
 - vii. Whistleblowing Policy; and
 - viii. Modern Slavery Policy.

All policies are available to access via the website.

Staff Training

All new Staff shall complete the Club's induction process which includes familiarisation with the Club's safeguarding policies, procedures (including this Policy) and expected standards of behaviour including those contained within the Safeguarding Code of Conduct.

All Staff shall complete the Premier League's safeguarding e-learning module (or an appropriate equivalent approved by the Club's Head of Safeguarding in accordance with Premier League Rule S.8.) before commencing their role or as part of the induction process. This will be followed by delivery of face-to-face safeguarding training either before or very soon after commencing their role.

Following the induction period all Staff shall receive appropriate and relevant safeguarding education and training including Online Safety training, “**PREVENT**” training in accordance with the Club’s “PREVENT Duty” (detailed and defined further below) and the Premier League’s Safeguarding Standards 2023/24 including training in relation to awareness to support identification of mental health issues and additional Vulnerabilities with Adults at Risk. Refresher training will be provided at appropriate intervals.

Safeguarding legislation and guidance

The Club’s approach to Adult and Adult at Risk protection is based on the principles recognised within UK and International legislation and UK Government guidance. For the purposes of this Policy, the following have been taken into consideration:

- Care Act 2014
- The Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Domestic Violence Act 2018
- Sexual Offences Act 2003
- The UK Data Protection Act and UK General Data Protection Regulation 2018
- Equality Act 2010
- Terrorism Act 2000
- Mental Capacity Act 2005

Statutory guidance:

- Care and Support Statutory Guidance 2014, with particular reference to Chapter 14

Regulatory guidance:

- The Football Association Safeguarding Policy and Procedures
- The Premier League Safeguarding Policy and Procedures 2023/24
- Premier League Guidance for Safer Working Practice

What is safeguarding?

Safeguarding means:

- protecting Adults and Adults at Risk from Abuse;
- preventing harm to Adults or Adults at Risk's health or development;
- ensuring that Adults at Risk have safe and effective care; and
- taking action to enable all Adults and Adults at Risk to have the best outcomes.

In order to implement this Policy, the Club will ensure that:

- Everyone involved with the Club is aware of the safeguarding procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an Adult or Adult at Risk.
- Any Concern is taken seriously, responded to promptly, and followed up in line with the Club this Policy and the associated procedures.
- The well-being of those at risk of harm will be put first and the Adult or Adult at Risk actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to (see the Safeguarding Adults Procedures).
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy.
- The Club acts in accordance with best practice advice, for example, from Sport England, the Football Association and the Premier League.
- The Club will cooperate with the Police and the relevant Local Authorities in taking action to safeguard an Adult or Adult at Risk.
- All Board members, Staff, officials and volunteers understand their role and responsibility for safeguarding Adults and Adults at Risk and have completed and are up to date with safeguarding training and learning opportunities appropriate for their role.
- The Club uses safer recruitment practices and continually assesses the suitability of volunteers and staff to prevent the employment/deployment of unsuitable individuals in this Club and within the sporting community.
- The Club shares information about anyone found to be a risk to Adults or Adults at Risk with the appropriate bodies. For example: Disclosure and Barring Service, Services, Police, Local Authority/Social Services.
- When planning activities and events the Club includes an assessment of, and risk to, the safety of all Adults and Adults at Risk from abuse and Neglect and designates a person who will be in attendance as a safeguarding lead for that event.

Good practice guidance: working with Adults at Risk

All Staff are required to adhere to the Premier League's Guidance for Safer Working Practice and/or equivalent regulations as in place from time to time.

Abuse, particularly Sexual Abuse, can generate strong emotions in those having to deal with such a Concern. It is important to understand these feelings and not allow them to interfere with your judgment about what action to take.

All Staff are encouraged to demonstrate exemplary behaviour in order to protect Adults at Risk and to protect themselves from Concerns.

The relevant sections of the Club's Safeguarding Code of Conduct should be studied. In addition, the following are common sense examples of good practice and how to create a positive culture when working with the Club and with Adults at Risk:

- always putting the welfare of Adults at Risk first;
- always working in an open environment (e.g. avoiding private or unobserved situations and encouraging an open environment with no secrets);
- build balanced relationships based on mutual trust which empower Adults at Risk to share in the decision-making process;
- treating all Adults and Adults at Risk equally and with respect and dignity;
- maintaining a safe and appropriate distance with Adults at Risk both emotionally and physically;
- being an excellent role model; and
- recognising the developmental needs, capacity and additional Vulnerabilities of Adults at Risk.

Recognition of poor practice and possible Abuse

Staff are not expected to be experts at recognition of Abuse. However, they do have a responsibility to act if they have any Concerns about the behaviour of someone towards an Adult or Adult at Risk and to follow the reporting procedures in this Policy.

Concerns may relate to poor practice where a someone's behaviour is inappropriate and may be causing harm to an Adult or Adult at Risk. In the application of this Policy, poor practice includes any behaviour bringing the Club into disrepute with regard to the treatment of an Adult or Adult at Risk, or in contravention of any Football Authority Regulations, Data Protection Legislation or Club policy or guidance which may result in the infringement of an individuals' rights and/or failure to fulfil the highest standards of care.

Examples of poor practice:

- failure to act when you witness possible Abuse, Bullying or Neglect;
- spending excessive amounts of time alone with an Adult at Risk away from others;
- using inappropriate language;
- making sexually suggestive comments;
- allowing Concerns raised by an Adult or Adult at Risk to go unchallenged, unrecorded or not acted upon;
- harassment of an Adult at Risk because of their protected characteristics;
- not meeting the needs of an Adult at Risk e.g. training without a necessary break; and
- sending sexually explicit messages or images to an Adult at Risk.

Upon this basis, the Club would usually recommend that the personal care for Adults at Risk should not be undertaken by Staff. If an Adult at Risk is disabled to the extent that they need assistance with personal care, this should be carried out by their parent, carer, or other person with parental responsibility.

Staff must report any Concerns or examples of poor practice to the Safeguarding Team immediately and within 24-hours.

Identifying Concerns

An Adult or Adult at Risk may confide to a member of Staff, coach, volunteer or another participant that they are experiencing Abuse inside or outside of the Club's setting. Similarly, others may suspect that this is the case.

It can be very hard for a victim of Abuse to speak out, they fear there may be negative consequences if they tell anyone what is happening to them. Some may delay telling someone about Abuse for a long time, while others never tell anyone, even if they want to.

It is vital that Adults are able to speak out and that whoever they tell takes them seriously and acts on what they have been told. Even if an Adult or Adult at Risk does not tell someone verbally about what has happened to them, there may be other indicators that something is wrong. Staff need to be able to recognise the signs and how to respond appropriately.

Staff must maintain an attitude of **"it could happen here"**.

Some common signs that there may be something concerning happening in an Adult or Adult at Risk's life include:

- unexplained changes in behaviour or personality;
- becoming withdrawn;
- seeming anxious;
- becoming uncharacteristically aggressive;
- unexplained bruises or injuries – or a lack of medical attention when an injury is present;
- belongings or money going missing;
- not attending or no longer enjoying their sessions or work;
- losing or gaining weight, an unkempt appearance e.g. a deterioration in hygiene;
- indicators of self-harm;
- a fear of a particular group of people or an individual; and/or
- telling you or another person that they are the victim of Abuse.

It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that Abuse is actually taking place.

It is not the responsibility of Staff to decide if an Adult or Adult at Risk is being subject to Abuse, but it is the responsibility of all Staff to act on any Concern by reporting it to the Safeguarding Team.

Staff need to be able to notice the signs that an Adult or Adult at Risk might be distressed and ask them appropriate questions about what might have caused this.

It is important to create an environment where Adults and Adults at Risk are comfortable about speaking out if anything is worrying them.

Staff should never wait until an Adult or Adult at Risk tells you that they are being Abused directly before taking action. Instead, ask if the Adult or Adult at Risk is okay or discussed your concerns with the Safeguarding Team as soon as possible, they can help you to assess the situation.

Staff must report any Concerns or examples of poor practice to the Safeguarding Team immediately and within 24-hours.

Additional Vulnerabilities

Some Adults and Adults at Risk may be at an increased risk of Abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusions, social deprivation, adverse childhood experiences, those with communication issues and reluctance on the part of some individuals to accept that Abuse happens, or who have a high level of tolerance in respect of Neglect.

Whilst Abuse can happen to everyone. Special consideration and attention should be given to Adults at Risk, in particular those who:

- are disabled or have special educational needs;
- have spent time in care as a child;
- are living in a known domestic Abuse situation; and
- have been affected by known parental substance misuse or parental criminality, in particular if they are still habitually residing with the known individual.

The presence of these factors does not mean that Abuse will occur, but Staff should use their professional judgment to assess their significance in a particular Adult at Risk and should be considered alongside any concerning factors.

Capacity to make decisions

UK law assumes that all people over the age of 16 years old have the ability to make their own decisions, unless it has been proved that they can't. It also gives us the right to make any decision that we need to make and gives us the right to make our own decisions even if others consider them to be unwise.

In order to make a decision, an individual must be able to:

- Understand information
- Remember it for long enough
- Think about the information
- Communicate our decision

A person's ability to make decisions may be affected by things such as learning impairments, dementia, mental health needs, acquired brain injury and physical ill health.

Most Adults have the ability to make their own decisions given the right support however, some Adults with care and support needs have the experience of other people making decisions about them and for them.

A person's Capacity can change. If it is safe/possible to wait until they can be involved in decision making or to make the decision themselves.

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.

- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

Capacity is important for safeguarding for several reasons. Not being allowed to make decisions one can make is Abuse.

Capacity must also be considered when we believe Abuse or Neglect might be taking place. It is important to make sure an Adult at Risk has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened. However, in some situations the Adult at Risk may not have the Capacity to understand the choice or to tell you their views.

The following are principles to follow about when and how we can make decisions for people who do not have Capacity:

- only make decisions for other people if they cannot do that for themselves at the time the decision is needed;
- if the decision can wait, wait – e.g. to get help to help the person make their decision or until they can make it themselves;
- if we have to make a decision for someone else then we must make the decision in their best interests and for their benefit and take into account what we know about their preferences and wishes; and
- if the action we are taking to keep people safe will restrict them then we must think of the way to do that which restricts to their freedom and rights as little as possible.

An Adult at Risk participating in sports organisations will ordinarily be accompanied by someone e.g. a family member or formal carer whose role includes supporting them to make decisions.

It is good practice to get as much information about the person as possible. Some Adults at Risk will have a 'One page profile' or a 'This is me' document that describes important information about them, including how to support the person, their routines, food and drink choices etc. but will also include things they like and don't like doing. It is also important to have an agreement with the person who has enrolled the Adult at Risk in the sports activity about how different types of decisions will be made on a day-to-day basis.

If a person who has a lot of difficulty making their own decisions is thought to be being abused or neglected you will need to refer the situation to the Local Authority, and this should result in health or social care professionals making an assessment of Capacity and/or getting the person the support, they need to make decisions.

There may be times when a sporting organisation needs to make decisions on behalf of an individual in an emergency. Decisions taken in order to safeguard an Adult who cannot make the decision for themselves could include:

- Sharing information about safeguarding concerns with people that can help protect them.
- Stopping them being in contact with the person causing harm.

Online Safety

While online gaming, social media, communication and engagement platforms offer many benefits and positive opportunities, it is important to be aware that it is an increasingly influential part of life and as a result can prevent a wide range of risks which include being exposed to illegal, harmful, explicit or inappropriate content and contact, for example:

- **Content:** pornography, misinformation/fake news, racism, misogyny, self-harm, suicide, pro-suicide content, anti-Semitism, Radicalisation and Extremism, harmful challenges and hoaxes, violence, cruelty to humans and animals, glorifying activities such as drug taking, sexual abuse and rape.
- **Contact:** being subjected to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising and individuals with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images and/or pornography or other explicit images and Cyber Bullying.
- **Commerce:** financial risks such as online gambling, inappropriate advertising, phishing and or financial scams.

As above, social media is a common tool for the sharing of content associated with Extremism. Extremist groups actively use social media to share propaganda, radicalise and recruit for their cause. Staff must be aware of the Club's Online Safety measures which are an important element of protection from Radicalisation and Extremism.

Adults at Risk may expose themselves to danger, whether knowingly or unknowingly when using the internet and other technologies including Cyber Bullying.

For more specific and detailed guidance, please refer to the Club's Online Safety Policy.

Sexual Image Sharing

The Club is committed to ensuring that Adults and Adults at Risk are protected from the inappropriate use of their images. No images should be taken of Adults or Adults at risk without the necessary consent being obtained first including consent as to how the images will be used, especially if this is on websites and other publications.

Staff need to be aware that although a lot of Adults and Adults at Risk may see taking, sharing or receiving naked or inappropriate photographs as harmless, this can have a long-term lasting effect including blackmail, Bullying, Cyber Bulling, emotional distress and presents an opportunity for grooming and non-contact Abuse to take place. Consensual image sharing may not be abusive, but Adults and Adults at Risk should be aware that non-consensual image sharing is illegal and abusive.

For more information on sexual image sharing, please refer to the Club's Online Safety Policy.

Disclosure

Disclosure is the process by which Adults or Adults at Risk start to share their experiences of Abuse with others. This can take place over a long period of time – it is a journey, not one act or action. Not all disclosures will lead to a formal report of Abuse, or a case being made, or taken to court, but all disclosures should be taken seriously.

It is vital that all Staff are able to provide anyone disclosing Abuse with the support that they need.

If an Adult, or Adult at Risk, discloses Abuse to Staff, they should:

- listen to what you are told without leading the conversation;
- use open questions, starting with words such as “what”, “how”, “when”, “where”, asking the Adult or Adult at Risk to tell you what happened, allowing them the space, privacy and time to say what they need to;
- take accurate and detailed notes;

- continue asking questions until you know whether it is a Concern or whether to rule out a Concern;
- report the disclosure on MyConcern App immediately **and, in any event, within 24-hours**;
- follow up the recording with a phone call to the Safeguarding Team;
- share the information on a **need-to-know basis only**. Do not discuss with colleagues, friends or family; and
- seek support for yourself if you are distressed.

Non-biased approach

It is vital that any Adult or Adult at Risk who is trying to disclose Abuse feels that they are being listened to and taken seriously. But there can be a risk that if Staff just believe the account without thorough investigation of the situation that this can lead to unfair bias against the alleged abuser as formal investigations progress.

This means it is important to maintain an unbiased approach when responding to disclosures to ensure each case is treated in a fair and transparent manner and that the Adult or Adult at Risk gets the protection and support that they need.

Making notes

It is important to keep accurate and detailed notes on any Concerns you have about potential or alleged Abuse. Staff will need to share these with the Safeguarding Team.

Where possible the note should include:

- the Adult or Adult at Risk's details (name, age, address);
- what the Adult or Adult at Risk has said or did that gave cause for concern (if a verbal disclosure, write down the exact words); and
- any information that you have been given about the alleged abuser.

Staff should not:

- start your own investigation;
- ask leading questions i.e. questions that provide the answer within them;
- promise that you will keep a secret;
- speak to the alleged abuser about the Concern; or
- fail to report the Concern to the Safeguarding Team.

What to do if you are worried about an Adult or Adult at Risk

If you are worried about an Adult or Adult at Risk, because of something you have noticed in their behaviour or appearance, or because of something they or another person has told you, you **must report your concerns to a member of the Safeguarding Team immediately and within 24-hours**.

If a concern comes to your attention "out of hours", staff must report the Concern (via telephone or the email address below) to the Safeguarding Team immediately and within 24-hours. Staff must also take the action necessary to help the Adult and ensure their safety. If the Adult or Adult at Risk is in immediate danger, call 999 for local Police. If the Adult is in need of immediate medical attention, contact 999 and request emergency medical services, informing them of your Concerns in relation to the alleged Abuse.

Any Club-wide safeguarding Concerns can be addressed to any member of the wider Safeguarding Team via: safeguarding@tottenhamhotspur.com

Where the Head of Safeguarding and Welfare is absent, their role will be deputised to a Safeguarding Manager, and this will be signalled in the Head of Safeguarding and Welfare's Out of Office message.



It is the **Staff's responsibility to report Concerns** to the Safeguarding Team via the MyConcern App, followed by a phone call.

It is the **Safeguarding Team's responsibility to make decisions** about the level of risk and next steps.

Recording

All Staff should have the MyConcern App on their mobile phones. Please notify the Club's IT Team and Safeguarding Team if it is not installed. Staff must register for their account prior to using the MyConcern App. When logging a Concern, Staff must write clearly and consistently, including the time, location, name of the Adult or Adult at Risk, date of birth, contact details and a brief description of the Concern. Alternatively, MyConcern can be accessed via a desktop computer.

All Concerns must be logged via the MyConcern App **immediately and in any event within 24-hours** and followed-up by a phone call to the Safeguarding Team.

Information Sharing

Sharing information appropriately is a cornerstone of all safeguarding practice. No one person is responsible for safeguarding – **safeguarding is everyone's responsibility**.

Sharing information, with the right people, is central to good practice in safeguarding Adults and Adults at Risk. However, information sharing must only ever be with those with a 'need to know'. This does **NOT** automatically include the persons spouse, partner, child, friend, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the Adult or Adult at Risk, or if the Adult does not have Capacity to make that decision and family/friends/carers need to know in order to help keep the person safe.

No member of Staff should hold responsibility for a Concern alone; best practice requires that all Concerns, however seemingly minor, must be shared. Seemingly minor Concerns may be serious when combined with other factors, and no one member of Staff can hold the whole Picture of Need about an Adult or Adult at Risk. Concerns must always be shared and held centrally by the Club's dedicated Safeguarding Team.

The Safeguarding Team have expertise in safeguarding and hold the wider understanding of risks to individuals. This makes the Safeguarding Team best able to judge the severity of Concerns presenting.

The Safeguarding Team may share information with partner agencies, such as social care, health and Police.

Seeking consent to share information

Adults and Adults at Risk should be given the opportunity to decide whether they agree to their personal information being shared with external bodies, for example, the Police or the LADO. If an Adult at Risk does not have the capacity to make their own decisions ask their parent, carer or other person with parental responsibility (unless doing so would put them at risk of harm).

Tips for getting consent:

- be open and honest;
- make sure the person you are asking for consent understands what information will be shared and why;
- explain who will see the information and what it will be used for;
- make sure the person you are asking for consent understand the consequences of their information not being shared;
- get the consent in writing, in case there are any disputes in the future. If it is only given verbally, make a written record of this; and
- make sure the person knows they can withdraw consent at any time.

Sharing information without consent

If consent is refused or if you are unable seek consent, you can still share information with relevant professionals if this is in the public interest. This includes protecting Adults or Adults at Risk from significant harm and promoting the welfare of Adults or Adults at Risk.

The circumstances when we may need to share information without the Adult's consent include those where:

- it is not safe to contact the Adult or Adult at Risk to gain their consent – i.e. it might put them or the person making contact at further risk;
- you believe they or someone else is at risk, including children;
- you believe the Adult or Adult at Risk is being coerced or is under duress;
- it is necessary to contact the Police to prevent a crime, or to report that a serious crime has been committed;
- the Adult does not have Capacity to consent to information being shared about them;
- the person causing harm has care and support needs; or
- the concerns are about an Adult at Risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

The Data Protection Act 2018 and General Data Protection Regulation (“**GDPR**”) allow data sharing to take place without consent for safeguarding purposes.

In order to received support regarding safeguarding issues, contact the Safeguarding Team.

If you are sharing information without consent keep a written record explaining:

- what steps you took to get consent;
- the person's reasons for not giving consent (if known); and
- why you felt it was necessary to share information without consent.

For further information and advice on sharing information without consent please speak to a member of the legal, risk and compliance team.

Confidentiality and Data Protection

While sharing information is crucial in order to safeguard Adults and Adults at Risk, it's equally important that this is done in line with government guidance Information Sharing: A Guide for Practitioners 2018.

Data protection should not cause us to be overcautious and not share safeguarding Concerns, but it must be recognised that data protection is about protecting people not just data. Confidentiality within a safeguarding context is key to lawful practice, and it sits alongside our obligations under the Data Protection Act and the Human Rights Act. It also helps to maintain a relationship of trust and respect with families.

Sharing information should take place with the consent of parents, carers or other persons with parental responsibility and in communication with Adults and Adults at Risk, wherever practicable. While consent is not required for the sharing of Adults at Risk protection Concerns, consent and transparency are always preferred to achieve best practice.

Storage of Information

Adults and Adults at Risk protection information will be stored and handled in line with the Data Protection Act 2018 and UK GDPR.

- Information will be stored separately from other records and in a secure place with access granted to designated people, in line with the Data Protection Act and UK GDPR – in that information will be accurate, regularly updated/corrected, and that its storage is relevant and secure.
- All safeguarding and data relating to Adults and Adults at Risk is stored on the MyConcern App, which is a secure and encrypted case management system registered with the Information Commissioner's Office ("ICO") and fully compliant with the Data Protection Act 2018 and UK GDPR.
- Staff are referred to the Club's Data Protection Policy for more information regarding our data processing.

Referrals to Regulators and Statutory Agencies

In accordance with the Managing Allegations Against Staff Policy and in compliance with its regulatory and legislative obligations, the Club may refer Concerns to external agencies, including but not limited to:

- The Football Association;
- The Premier League;
- Local Authorities; and
- The Police.

Concerns involving Staff

Whenever there are Concerns involving a member of Staff in respect of an Adult at Risk, it is a requirement to **report them to the Head of Safeguarding immediately and in any event within 24-hours**.

Please see the Managing Safeguarding Concerns Against Staff Policy for further information.

Positions of Trust

A Position of Trust involves a person in a position of authority over another person. Individuals who have responsibility for or authority over an Adult at Risk are in a Position of Trust. There is a need to protect Adults at Risk who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to Sexual Abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with

individuals who hold a Position of Trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence.

The power and influence that a member of Staff has over someone cannot be under-estimated. It is therefore vital for Staff to recognise the responsibility they must exercise in ensuring that they could not be considered to have abused their Position of Trust. Everyone involved in supervising Adults at Risk should be careful to ensure that the appropriate boundaries remain in their working relationships between themselves and participants.

Staff are expected to at all times maintain healthy, positive and professional relationships with all Adults at Risk.

Within the context of Club football, this Position of Trust can be compounded by the power of the brand and the ability to provide opportunities and access. Staff must always be mindful of this power differential to ensure that their position is not used for personal advantage or gratification and exercised with responsibility and respect.

All Staff are in a Position of Trust in relation to all Adults at Risk, participants and players whether or not they are in regulated activity.

No Staff should engage in sexual relationships with any Adults at Risk. The Club will consider such action gross misconduct, and this will result in dismissal.

The Club will investigate whether an inappropriate relationship, inappropriate communication or other perceived “grooming” behaviour has been demonstrated by a Staff member. This will be carried out in accordance with the Club’s disciplinary procedures as in place from time to time. The Club reserves the right to refer any Concerns to the Police.

PREVENT

PREVENT is one of the four elements of “**CONTEST**”, the government’s counter Terrorism strategy. The four elements are:

- Pursue;
- Protect;
- Prepare; and
- Prevent.

PREVENT aims to stop people becoming involved in violent Extremism. The Prevent strategy responds to the ideological challenge of Terrorism and aspects of Extremism, and the threat from those who promote these views. It provides practical help to prevent people from being drawn into Terrorism and ensure they are given appropriate advice and support.

The national Prevent strategy has three specific strategic objectives:

- **Respond** to the ideological challenge of Terrorism and the threat we face from those who promote it.
- **Prevent** people from being drawn into Terrorism and ensure that they are given appropriate advice and support.
- **Work** with sectors and institutions where there are risks of Radicalisation that we need to address.

The PREVENT Duty incorporates the responsibility to promote fundamental British Values (as identified by Ofsted):

- Democracy;
- The rule of law;
- Individual liberty; and
- Mutual respect and tolerance of those different faiths and beliefs.

The PREVENT Duty covers all forms of Radicalisation, including risk from extremist faith groups, far right Extremism and some aspects of non-violent Extremism. There are different forms of extremist organisations in the UK and the world, including:

- British Defence League;
- Islamic State;
- Al-Qaeda;
- Boko Haram;
- SPEAK (animal rights);
- Irish Republican Army (“IRA”); and
- Anti-abortion groups.

Identifying an Adult or Adult at Risk who is being exploited or radicalised can often be difficult as there is no single factor that leads to an Adult or Adult at Risk being radicalised. The signs and indicators listed below are not exhaustive and the presence of one of these factors does not necessarily mean that an Adult or Adult at Risk is or has been radicalised or is involved in extremist activity. However, a combination of these factors may increase Vulnerability or may indicate that an Adult or Adult at Risk needs protection and/or support.

Safeguarding from Radicalisation is no different to protecting Adults or Adults at Risk from other forms of harm.

Vulnerability:

- **Identity crisis:** distance from cultural or religious heritage and uncomfortable with their place in the society around them.
- **Personal crisis:** family tensions or trauma, sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and seeking a sense of belonging.
- **Personal circumstances:** migration, local community tensions, events affecting country or region of origin, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet aspirations:** perceptions of injustice, feeling of failure, rejection of civic life.
- **Criminality:** experiences of imprisonment, poor resettlement or reintegration or previous involvement with criminal groups.
- **Experience** of poverty, disadvantage, discrimination or social exclusion.
- **Learning difficulties** and mental health support needs.
- **Experienced personal trauma**, particularly any trauma associated with war or sectarian conflict.

Behaviours:

- Using violent extremist narratives and ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Significant shift in behaviour or outward appearance that suggests a new social, political, or religious influence.

- Conflict with family over religious beliefs, lifestyle or dress choices.
- Vocal support for terrorist attacks (either verbally or written).
- Witnessed or been the perpetrator or victim of racial or religious hate crime.
- Travel for extended periods of time to international locations known to be associated with extremist groups and activity.
- Significant changes in emotional behaviour, for example, becoming withdrawn or angry.
- Sharing of views or trying to influence others with extremist Ideology.
- Ignoring or demonising viewpoints that contradict their own.
- Expressing themselves in an 'us versus them' manner about others who have alternative beliefs.
- Increasingly secretive or unwilling to discuss views.
- Changing their circle of friends.
- Losing interest in activities they once enjoyed.
- Becoming socially withdrawn or spending a lot of time online.
- Secretive about who they talk to online and which websites they visit.
- Belief in conspiracy theories and distrust of mainstream media.
- Justifying the use of violence or expressing a desire for revenge.

Access to Extremism/extremist influences:

- Association with extremist groups, associates or family engaging in extremist activity.
- Accessing the internet for the purpose of extremist activity, for example, use of closed network groups, access to or distribution of extremist material, contact associates covertly via online measures, for example, Skype and email.
- Possesses or is actively seeking to possess and/ or distribute extremist literature or other media material likely to incite racial, religious hatred or acts of violence.
- Support for groups with links to extremist activity, for example, propaganda distribution, fundraising and attendance at meetings.
- Extremist ideological, political or religious influence from within or outside UK.

Reporting concerns of Radicalisation and Extremism

Staff must report all Concerns relating to Radicalisation and/or Extremism to the Safeguarding Team immediately and within 24-hours.

If the Concern represents an immediate threat or risk, then Staff must (in addition to reporting the Concern to the Safeguarding Team) contact:

- Police: 101 (999 in an emergency)
- Counter Terrorism Police: <https://actearly.uk/contact/>
- Report online material promoting Terrorism or Extremism. <https://www.gov.uk/report-terrorism>

Risk Assessment and Action Plan

The Club will undertake a risk assessment of where and how individuals might be at risk of being drawn into Terrorism. The level of risk will vary between Activities, geographical location, and profile of participants.

The risk assessment will consider information from external sources, such as the regional Prevent Co-ordinator, Local Authority and the Police.

The resulting Prevent Action Plan will mitigate the risks in a proportionate manner. The Club's Prevent Action Plan will be regularly monitored by the Head of Safeguarding and Welfare.

Where significant risks are identified, the Head of Safeguarding and Welfare in collaboration with senior managers, will consider what action might mitigate the impact/likelihood of that risk evolving and, where necessary, include it on the Prevent Action Plan.

All Staff in regulated activity will complete a biannual "Raising Awareness About Prevent" training. Staff must also complete the online PREVENT training as part of their Club induction.

Reporting Extremist narratives or Radicalisation Concerns

All Staff have a Duty of Care to report and escalate concerns using the Club's safeguarding reporting process.

For more information, see: <https://www.gov.uk/government/publications/channel-guidance>

Appendix: Sources of Information and Support

Action on Elder Abuse

A national organisation based in London. It aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.

Tel: 020 8765 7000

Email: enquiries@elderabuse.org.uk

www.elderabuse.org.uk

Ann Craft Trust (ACT)

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector:

Tel: 0115 951 5400

Email: ann-craft-trust@nottingham.ac.uk

www.anncrafttrust.org

Men's Advice Line

For male domestic abuse survivors:

Tel: 0808 801 0327

National LGBT+ Domestic Abuse Helpline

Tel: 0800 999 5428

National 24Hour Freephone Domestic Abuse Helpline

Tel: 0808 2000 247

www.nationaldahelpline.org.uk/Contact-us

Rape Crisis Federation of England and Wales

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

Email: info@rapecrisis.co.uk

www.rapecrisis.co.uk

Respond

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.

Tel: 020 7383 0700 or

0808 808 0700 (Helpline)

Email: services@respond.org.uk

www.respond.org.uk

Stop Hate Crime

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

24 hours service:

Telephone: 0800 138 1625

Web Chat: www.stophateuk.org/talk-to-us/

E mail: talk@stophateuk.org

Text: 07717 989 025

Text relay: 18001 0800 138 1625

By post: PO Box 851, Leeds LS1 9QS

Susy Lamplugh Trust

The Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

Tel: 020 83921839

Fax: 020 8392 1830

Email: info@suzylamplugh.org

www.suzylamplugh.org

Victim Support

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

Tel: 0808 168 9111

www.victimsupport.com

Women's Aid Federation of England and Wales

Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service.

www.womensaid.org.uk/information-support