

TOTTENHAM HOTSPUR FOOTBALL CLUB

Safeguarding Adults Policy

December 2024

Introduction

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's 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 when deciding on any action.

The Club’s Safeguarding Children and Safeguarding Adults policies are to be read together. These ensure the safety and protection of vulnerable groups.

The Club is committed to safeguarding Adults in line with national legislation and relevant national and local guidelines. The Club will safeguard all Adults by ensuring that the Club’s activities are delivered in a way which keeps all Adults safe, and in line with the Premier League’s Creating Safe Environments Guidance.

The Club is committed to creating a culture of zero-tolerance of harm to Adults which necessitates:

- the recognition of Adults who may be at risk;
- contexts and conditions which may increase risk;
- knowing how Adult abuse, exploitation or neglect 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.

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

Definitions

Abuse:	may lead to a child or an Adult at Risk experiencing or being exposed to harm. Abuse of Adults can be categorised under physical abuse, sexual abuse, emotional/psychological abuse, neglect/self-neglect, organisational abuse, financial abuse, discriminatory abuse, modern slavery, bullying.
Adult:	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.
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).
Channel:	is a multi-agency safeguarding process and early intervention strategy aimed at identifying and supporting individuals vulnerable to the recruitment of violent extremism. It must be noted this includes all forms of extremism. It is a mechanism for ensuring that these individuals are assessed and supported by professionals using statutory safeguarding frameworks and multi-agency partnership working.
Concern:	fear, worry or concern that an Adult may be at risk of Abuse;
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.
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.

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.
Gross Misconduct:	means an action that destroys the relationship of trust between an employer and an employee.
Mental Capacity:	an individual's ability to understand information and make decisions about their life, including the ability to communicate decisions about their life.
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.
Prevention & Response Team:	means the Club/Foundation/Women's Safeguarding Team with specific specialist responsibilities for the management of safeguarding and child protection.
Radicalisation:	means the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
Staff:	means anyone in paid work who provides services or activities for the Club and includes the terms: employee and personnel.

Policy Statement

The Club:

- believes 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;
- 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;
- acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all Adults involved;
- recognises that health, well-being, ability, Disability and 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; and
- 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 and will act in accordance with the relevant safeguarding Adult legislation and with local statutory safeguarding procedures.

Actions taken by Club will be consistent with the principles of Adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the Adult concerned.

Purpose

The purpose of this Policy is to demonstrate the commitment of the Club to safeguarding Adults and to ensure that everyone involved in the Club is aware of:

- the legislation, policy and procedures for safeguarding Adults;
- their role and responsibility for safeguarding Adults; and
- what to do or who to speak to if they have a concern relating to the welfare or wellbeing of an Adult within the Club.

Scope

This Policy and associated procedures apply to all individuals involved in The Club, including Board members, Staff (permanent, casual, contractors, third-parties, consultants, etc), volunteers and fans/supporters, and to all concerns about the safety of Adults whilst taking part in our Club, its activities and in the wider community.

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.

Commitments

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

- Everyone involved with the Club is aware of the safeguarding Adult procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an Adult.
- Any concern that an Adult is not safe 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 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.
- All Board members, Staff, officials and volunteers understand their role and responsibility for safeguarding Adults and have completed and are up to date with safeguarding Adult training and learning opportunities appropriate for their role.
- The Club uses safe 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 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 from abuse and neglect and designates a person who will be in attendance as a safeguarding lead for that event.
- Actions taken under this policy are reviewed by the Board and senior management team on an annual basis.
- This policy, related policies (see below) and the Safeguarding Adults Procedures are reviewed annually.

The Club is committed to developing and maintaining its capability to implement this policy and procedures. In order to do so the following will be in place:

1) Accountability, Governance & Oversight

- A clear line of accountability within the Club for the safety and welfare of all Adults, under the Head of Safeguarding & Welfare through the Safeguarding Governance structure (see below).
- Quarterly reports from the Safeguarding Team to the Safeguarding Board and the Senior Safeguarding Lead.

2) Workforce Development

- Staff understand Adult safeguarding as it relates to their role, as covered in the Corporate Induction.
- Staff can access ongoing learning and development to support their understanding and response.

3) Safeguarding policy

- Safeguarding procedures (below) clearly outline the process for responding to concerns.

Safeguarding policies are updated annually.

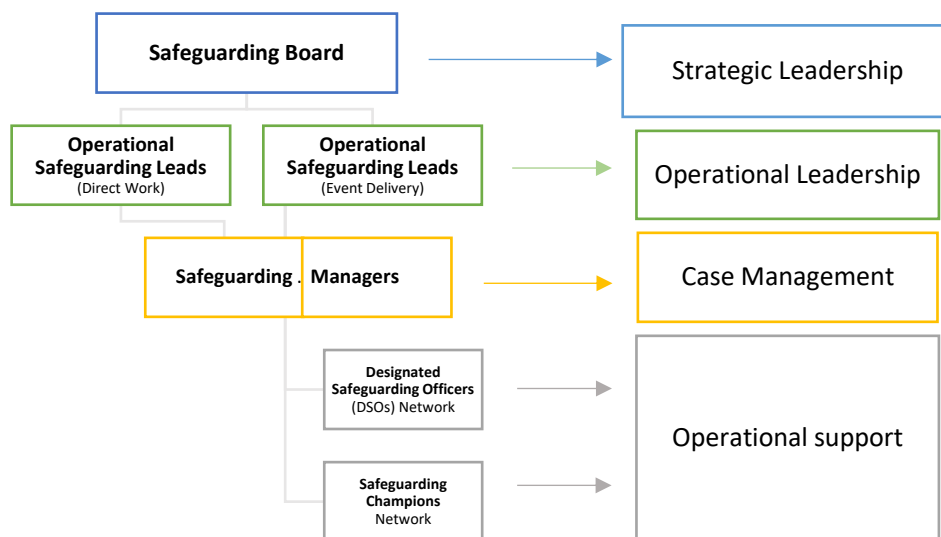
Safeguarding Procedure

- a) Call and discuss your concern with a member of the Safeguarding Team (see contact details below).
- b) Record the concern on MyConcern within 24 hours.
- c) The Safeguarding team will assess what next steps are needed, including whether to refer to external agencies. They will support case management until case closure.
- d) Staff to follow guidance of Safeguarding Manager, keep MyConcern updated, and ask for further support when needed.

Safeguarding Team

Title/Role	Name	Contact Details
Club Safeguarding Team		safeguarding@tottenhamhotspur.com
Out of Hours Safeguarding Contact		safeguarding@tottenhamhotspur.com
Operations and Finance Director – Strategic Safeguarding Lead Board Representative	Matthew Collecott	020 83655322 matthew.collecott@tottenhamhotspur.com
Interim Head of Safeguarding and Welfare	Dawn Grant	07786186824 Dawn.grant@tottenhamhotspur.com or safeguarding@tottenhamhotspur.com
Safeguarding Manager - Foundation	Natalee Hibbert	07384 258 758 natalee.hibbert@tottenhamhotspur.com
Safeguarding Manager – Women and Girls	Sandra Barratt	07384 818062 sandra.barratt@tottenhamhotspur.com
Safeguarding Manager Academy	Tim Ford	07392080266 Tim.Ford@tottenhamhotspur.com
Senior Events Safeguarding Manager	Karen Bright	07918305242 Karen.bright@tottenhamhotspur.com
HR Director – Safer Recruitment	Lisa Beresford – Hines	lisa.beresford-hines@tottenhamhotspur.com

Safeguarding Governance



Key Adults Safeguarding Information

Key Points

- There is a legal duty on Local Authorities to provide support to Adults at Risk.
- The safeguarding legislation applies to all forms of abuse that harm a person's well-being.
- The law provides a framework for good practice in safeguarding that makes the overall well-being of the Adult at risk a priority of any intervention.
- The law in all four home nations emphasises the importance of person-centred safeguarding, (referred to as 'Making Safeguarding Personal' in England).
- The law provides a framework for making decisions on behalf of Adults who can't make decisions for themselves.
- The law provides a framework for sports organisations to share concerns they have about Adults at Risk with the local authority.
- The law provides a framework for all organisations to share information and cooperate to protect Adults at Risk.

Safeguarding Adults Legislation

Safeguarding Adults in all home nations is compliant with United Nations directives on the rights of individuals with physical or mental impairments and commitments to the rights of older people. It is covered by:

- The Human Rights Act 1998;
- The Data Protection Act 2018; and
- The General Data Protection Regulations 2018.

The practices and procedures within this policy are based on the relevant legislation and government guidance.

- England - The Care Act 2014; and
- Care and Support Statutory Guidance 2014, with particular reference to Chapter 14.

Many other pieces of UK and home nation legislation also affect Adult safeguarding. These include legislation about different forms of abuse and those that govern information sharing. For example, legislation dealing with:

- Murder/attempted murder
- Sexual Offences
- Physical Assault
- Domestic Abuse/Coercive control

- Forced Marriage
- Female Genital Mutilation
- Theft and Fraud
- Modern slavery and Human exploitation
- Hate crime
- Harassment
- Listing and Barring of those unsuitable to work with Adults with care and support needs

Other relevant legislation about the circumstances in which decisions can be made on behalf of an Adult who is unable to make decisions for themselves is included within the Mental Capacity Act 2005.

There are specific offences applying to the mistreatment of and sexual offences against Adults who do not have Mental Capacity and specific offences where mistreatment is carried out by a person who is employed as a carer e.g., wilful neglect and wilful mistreatment.

Abuse and Neglect

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place.

The Care Act (2014) – England's Safeguarding Adults Legislation – defines categories of Adult abuse and harm as follows:

- Physical;
- Sexual;
- Emotional/Psychological/Mental;
- Neglect and acts of Omission;
- Financial or material abuse;
- Discriminatory;
- Organisational/Institutional;
- Self-neglect;
- Domestic Abuse (including coercive control); and
- Modern slavery.

Abuse can take place in any relationship and there are many contexts in which abuse might take place, e.g., institutional abuse, domestic abuse, forced marriage, human trafficking, modern slavery, sexual exploitation, county lines, radicalisation, hate crime, mate crime, cyber-bullying and scams. Some of these are named specifically within home nation legislations.

Abuse can take place within a sporting context and the person causing harm might be any other person. For example: a member of staff, a coach, a volunteer, a participant or a fan.

Some examples of abuse within sport include:

- harassment of a participant because of their (perceived) Disability or other protected characteristics;
- not meeting the needs of the participant e.g. training without a necessary break;
- a coach intentionally striking an athlete;
- one elite participant controlling another athlete with threats of withdrawal from their partnership;
- an official who sends unwanted sexually explicit text messages to a participant with learning disabilities; and/or
- a participant threatens another participant with physical harm and persistently blames them for poor performance.

Abuse or neglect outside sport could be carried out by:

- a spouse, partner or family member;
- neighbours or residents;
- friends, acquaintances or strangers;
- people who deliberately exploit Adults they perceive as vulnerable; and
- paid staff, professionals or volunteers providing care and support.

Often the perpetrator is known to the Adult and may be in a position of trust and/or power.

Signs and Indicators of Abuse and Neglect

An Adult 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.

There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored.

It is not the responsibility of Staff to decide if an Adult 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.

The signs and symptoms include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending/no longer enjoying their sessions. You may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Someone losing or gaining weight/an unkempt appearance. This could be a player whose appearance becomes unkempt, does not wear suitable sports kit and there is a deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions in contrast to their personal assistant whom they greet with a smile.
- Self-harm.
- A fear of a particular group of people or individual.
- A parent/carer always speaks for the person and doesn't allow them to make their own choices
- They may tell you/another person they are being abused – i.e., a disclosure

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

Disclosure

Disclosure is the process by which Adults 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.

If an Adult discloses, Staff **should** adopt the following approach:

1. Listen, without leading the conversation.
It is vital that anyone disclosing Abuse feels that they are being listened to and taken seriously. Take care to use open questions, starting with words such as “what”, “how”, “when and “where” and to continue asking questions until you know whether it is a Concern or whether it should be ruled out. However, if you are ever unsure whether the Concern should be reported, please report the Concern and a member of the Safeguarding Team will make a decision.
2. Take accurate and detailed notes.
It is important to maintain an unbiased approach when responding to disclosures to ensure that each case is treated in a fair and transparent manner and that the Adult gets the protection and support that they need. If possible, the notes should record the following:
 - a. The Adult's details (name, age and address);
 - b. What the Adult said / did that gave you cause for concern; and
 - c. Any information the Adult has given you about the alleged abuser.
3. Report the disclosure on MyConcern App immediately and, in any event, within 24-hours.
4. Make a phone call to a member of the Safeguarding Team.
5. Following the Safeguarding Team's guidance on best next steps.
6. Share information on a need-to-know basis only, do not discuss with colleagues, friends or family.

Staff **should not**:

1. Conduct their own investigations.
2. Ask leading questions.
Leading questions are questions that provide the answer within them.
3. Promise an Adult that a secret will be kept.
4. Speak to the alleged abuser about the Concern.
5. Fail to report the Concern to the Safeguarding Team.

Reporting

If you witness or are worried about an Adult, 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 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.

Wellbeing Principle

“The success of sport, in terms of helping people achieve their potential, making the most of existing talent, and attracting new people to sport relies on putting people – their safety, wellbeing and welfare – at the centre of what sport does.”

*Duty of Care in Sport, Independent Report to Government
Baroness Tanni Grey-Thompson DBE, DL*

The concept of 'well-being' is threaded throughout UK legislation and is part of the law about how health and social care is provided. Our well-being includes our mental and physical health, our relationships, our connection with our communities and our contribution to society.

Being able to live free from abuse and neglect is a key element of well-being.

The legislation recognises that statutory agencies have sometimes acted disproportionately in the past. For example, removing an Adult at Risk from their own home when there were other ways of preventing harm. In the words of Justice Munby *'What good is it making someone safe when we merely make them miserable?'*¹

For that reason any actions taken to safeguard an Adult must take their whole well-being into account and be proportionate to the risk of harm.

Person-Centred Safeguarding / Making Safeguarding Personal

The legislation also recognises that Adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from friends and family to take a better job. Similarly, Adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

None of us can make these choices for another Adult. If we are supporting someone to make choices about their own safety, we need to understand 'what matters' to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.

The concept of 'Person-Centred Safeguarding'/'Making Safeguarding Personal' means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety.

The Club work to support Adults to achieve the outcomes they want for themselves. The Adult's views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

The Principles of Adult Safeguarding in the Care Act (2014)

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.

¹ Munby, J. (July 2010). What Price Dignity? Keynote address by Lord Justice Munby to the LGA Community Care Conference: Protecting Liberties, 14 July 2010

- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Mental Capacity and Decision-Making

We make many decisions every day, often without realising. 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.

We make so many decisions that it is easy to take this ability for granted. The Law says that to make a decision we need to:

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

A person's ability to do this 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.

Some people can only make simple decisions like which colour T-shirt to wear or can only make decisions if a lot of time is spent supporting them to understand the options. If someone has a Disability that means they need support to understand or make a decision this must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called lacking Mental Capacity.

A person's Mental Capacity can change. If it is safe/possible to wait until they are able to 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.

Mental Capacity is important for safeguarding for several reasons.

Not being allowed to make decisions one is capable of making is abuse. For example, an Adult who has Disability may want to take part in an activity but their parent who is their carer won't allow them to and will not provide the support they would need. Conversely the Adult may not seem to be benefiting from an activity other people are insisting they do.

Another situation is where an Adult is being abused and they are scared of the consequences of going against the views of the person abusing them. It is recognised in the law as coercion and a person can be seen not to have Mental Capacity because they cannot make free and informed decisions.

Mental 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 may not have the Mental Capacity to understand the choice or to tell you their views.

Each home nation has legislation that describes when and how we can make decisions for people who are unable to make decisions for themselves. The principles are the same.

- We can 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 (for their benefit) and take into account what we know about their preferences and wishes.
- 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.

Many potential difficulties with making decisions can be overcome with preparation. A person needing support to help them make decisions whilst taking part in a sports organisation 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 people with care and support needs will have a 'One page profile' or a 'This is me' document that describes important things about them. Some of those things will be about 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's also important to have an agreement with the person who has enrolled the Adult 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 Mental 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.

Recording and Information Sharing

All sports organisations must comply with the Data Protection Act (the “**DPA**”) and the General Data Protection Regulations (the “**GDPR**”), together the “**Data Protection Legislation.**”

Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.

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

The purpose of Data Protection Legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection Legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation; and
- Case management meetings can take place to agree to co-ordinate actions by the organisation.

There are also many situations in which it is perfectly legal to share information about Adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the Adult concerned. However, the Adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

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

- it is not safe to contact the Adult 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 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 Mental 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).

When information is shared without the consent of the Adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

If you are in doubt as to whether to share information, seek advice e.g., seek legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

Multi-Agency Working

Safeguarding Adults' legislation gives the lead role for Adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations.

Sports bodies may need to cooperate with the Local Authority and the Police including to:

- Provide more information about the concern you have raised.
- Provide a safe venue for the Adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Provide a safe environment for the Adult to continue their sporting activity/ their role in the organisation.

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