

Safeguarding policy

Content

1. Purpose	1
2. Introduction	1
3. Policy statement	1
4. Our Standards	2
5. Laws and regulations	3
6. Monitoring and compliance	3
7. Review and maintenance	4
8. Appendices	4

1. Purpose

This policy sets out Fair Game UK's approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all aspects of our activities and interaction with our communities, and to everyone working for Fair Game UK, including Directors, volunteers, advisors, and contractors.

2. Introduction

2.1 Everyone who engages with us has a right to be safe from harm and abuse. This policy is focused on everyone who has contact with us, including through our partners. The welfare of our people is also important and is addressed through our wellbeing policies.

2.2 Safeguarding is embedded into our way of working . This policy is crucial to delivering on the commitment to provide a safe and secure environment; and that we will take action when concerns are reported.

3. Policy statement

Aims

3.1 This policy sets out our commitment to:

- We believe all children and adults have a right to be safeguarded and protected from abuse, harm, violence, exploitation, harassment, and discrimination;
- We are committed to being transparent in our safeguarding work, and strive for the highest standards of safeguarding;
- We expect our people, and our partners, to understand their responsibilities, and to know how to respond when they have a safeguarding concern, or a safeguarding concern is raised;

- We look to continuously learn from incidents reported to us as part of our efforts to improve and reinforce our safeguarding culture.

Scope

3.2 This policy applies to:

- All our people (Directors, members of our Advisory Council, volunteers, delegates and all colleagues working on our behalf)

4. Our Standards

4.1 We take a person-centred approach to our safeguarding work. This means that the safety and rights of children and adults at risk of harm or abuse are central to how we respond.

4.2 We seek to work preventatively and have robust procedures in place to respond to safeguarding concerns effectively. We aim to advance the rights, dignity and wellbeing of children and adults at risk and wherever possible involve and inform individuals about safeguarding concerns relating to them.

4.3 We are committed to the highest safeguarding standards throughout all stages of our work with the communities. High safeguarding standards help to ensure a culture where exploitation and abuse is not tolerated in the football settings and beyond, and swift action is taken when a report is made.

4.4 Safeguarding standards

Standard 1: we will respond effectively when our people have safeguarding concerns about a child, young person, or adult. We will work preventively and help and build resilience.

Standard 2: we will support and monitor all reported safeguarding concerns, and actively look to learn from how we have handled reported concerns and incidents as part of our commitment to continuous improvement.

Standard 3: we take our safeguarding responsibilities seriously and have a consistent approach to agreeing and defining how we meet our responsibilities.

Standard 4: we are committed to working in partnership with partners to improve safeguarding outcomes with and for the people we support.

Standard 5: in line with safer recruitment guidance, we seek to recruit, support, and manage our people in a way that will promote and uphold the rights, dignity and wellbeing of everyone we engage with.

Behaviour

4.5 We expect all of our people to act with integrity as professional representatives of the organisation. We also expect our people to understand how their personal behaviour affects

the people who use our services; particularly in the context of working with children and adults at risk. Their own safety and security must be taken into account, as well as that of their colleagues, partners and funders.

4.6 Breaches of this policy will be taken seriously and appropriate action will be taken.. Action taken includes informing relevant authorities, including law enforcement, where appropriate. Our people are expected to look out for and report any concerns about our work or behaviour of our people and/or partners.

4.7 Regardless of the role or team they are a part of, safeguarding is the responsibility of all of our people. We expect our people to take seriously and follow up any safeguarding concern that comes to their attention and to create an environment where individuals feel enabled and supported to come forward with any reports, concerns, or allegations. Our people who see or experience any abusive or harmful behaviour that does not meet our high standards must report this so that we can take action.

5. Laws and regulations

This policy aims to ensure our compliance with the requirements of relevant UK legislation including the Care Act 2014, The Children Act 1989 (as amended), The Children and Social Work Act 2017, Keeping Children Safe in Education, Working Together to Safeguard Children 2018 , and Safeguarding Vulnerable Groups Act (SVGA) 2006 legislation.

6. Monitoring and compliance

6.1 Acting on safeguarding concerns

No one working for Fair Game UK should investigate concerns about individual children or vulnerable adults who are or may be being abused or who are at risk. However, this does not mean that we should do nothing when we learn of a concern. We all have a responsibility to make sure that concerns about children and vulnerable adults are passed to the agency that can help them without delay.

If anyone is concerned that a child or vulnerable adult is at risk of being abused or neglected, they should not ignore their suspicions and should not assume that someone else will take action to protect that person. Concerns should be raised with the Director of Fair Game UK responsible for safeguarding.

Concerns about children should be referred to the children's social care department of the local authority where the child lives. Similarly, concerns about vulnerable adults should be referred to local authority adult services. This will normally be done by the CEO or Director responsible for safeguarding.

Fair Game UK people who have concerns about the behaviour of a colleague must always raise this with their supervisor, the CEO or Chair as quickly as possible.

7. Review and maintenance

The Safeguarding policy was refreshed and approved in September 2022. It is next due to be reviewed in September 2024.

8. Appendices

Appendix 1: Glossary

A.1. Glossary

Definitions of Safeguarding terms used by Fair Game UK.

A.1.1 Definition of people at risk

A.1.2 Definitions of harm: Children

A.1.3 Definitions of harm: Vulnerable adults

A.1.1 Definition of people at risk

Safeguarding means protecting a person's right to live in safety, free from abuse and neglect. Everyone within Fair Game UK have a responsibility to safeguard children, young people and vulnerable people when working in the football communities, as they can be at particular risk of abuse or neglect.

A child is a person aged under 18 years; young people aged 16 or 17 who are living independently are still defined as 'children'.

A vulnerable adult is someone who may be in need of care because of a physical, learning or other disability, or because of their age or an illness. This definition also applies to an adult who is unable to take care of him or herself properly, or who is unable to protect him or herself from significant harm or exploitation.

Some groups of people are particularly vulnerable to harm and exploitation, and it is important that their needs are carefully considered:

- Those with disabilities
- Those living away from home
- Asylum seekers
- Children and young people in hospital
- Children in contact with the youth justice system
- Victims of domestic abuse

- Those who may be singled out due to their religion or ethnicity
- Those who may be exposed to violent extremism.

A.1.2 Definitions of harm: Children

Physical harm

Physical harm is defined as physical contact that results in discomfort, pain, or injury. It may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm.

Supplying drugs to children, or the use of inappropriate or unauthorised methods of restraint, also fall under this definition.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces or causes, illness in a child. This situation is commonly described as 'factitious illness by proxy' or 'Munchausen syndrome by proxy'.

Emotional and psychological harm

Emotional harm is defined as action or inaction by others that causes mental anguish. It involves the persistent emotional maltreatment of a child, which causes severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Such harm may feature age or developmentally inappropriate expectations being imposed on a child. These can include interactions that are beyond the child's development capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

Emotional harm may also involve witnessing aggressive, violent or harmful behaviour towards another individual (e.g. domestic violence). It may also involve serious bullying, frequently causing a child to feel frightened or in danger, exploitation, or corruption.

Some level of emotional harm is involved in all types of maltreatment of a child (e.g. grooming, harassment, or inappropriate emotional involvement), though it may occur alone.

Sexual harm and exploitation

Sexual harm is defined as any form of sexual activity involving a child under the age of consent. It involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening.

Such activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may also include non-contact activities, such as involving

children in the looking at, or production of, pornographic material, causing them to watch sexual activities, or encouraging them to behave in sexually inappropriate ways.

Downloading child pornography, taking indecent photographs of children, and sexualised texting, are all forms of sexual harm.

Neglect and acts of omission

Neglect is a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision and/or adequate care-givers
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Relevant conduct: Children

A child is a person under 18 years of age.

Any behaviour involving a child is classed as 'relevant conduct' if it:

- Endangers a child, or is likely to endanger a child
- If repeated against, or in relation to, a child, would endanger the child or be likely to endanger the child
- Involves sexual material relating to children (including the possession of such material)
- Involves sexually explicit images depicting violence against human beings (including the possession of such material)
- Includes any behaviour of a sexual nature involving a child.

A person's conduct endangers a child if it:

- Harms a child
- Causes a child to be harmed
- Puts a child at risk of harm
- Makes an attempt to harm a child
- Incites another person to harm a child.

A person's conduct satisfies the 'harm test' if they are thought likely to:

- Harm a child
- Cause a child to be harmed
- Put a child at risk of harm
- Make an attempt to harm a child
- Incite another person to harm a child.

A.1.3 Definitions of harm: Vulnerable adults

Safeguarding means protecting the adult's right to live in safety and free from abuse and neglect and promoting the adult's wellbeing.

Safeguarding duties apply to an adult at risk as defined in Section 42 of The Care Act 2014 which is:

- Has needs for care and support (whether or not the authority is meeting any of those needs)
- Is experiencing, or at risk of abuse and neglect
- As a result of their needs for care and support unable to protect themselves from the abuse or neglect or risk of it.

Physical harm

Physical harm is any physical contact that results in discomfort, pain, or injury. Examples of physical harm include:

- Assault, rough handling, hitting, slapping, punching, pushing, pinching, shaking bruising, or scalding
- Exposure to excessive heat or cold
- A failure to treat sores or wounds
- Inappropriate use of medication (e.g. under- or overuse of medication, or the use of un-prescribed medication)
- The use of inappropriate sanctions
- The unlawful or inappropriate use of restraint or physical interventions
- The deprivation of liberty.

Sexual harm and exploitation

Examples of sexual harm and exploitation can include the direct or indirect involvement of the vulnerable adult in sexual activity or relationships that:

- They do not want or have not consented to
- They cannot understand, and cannot consent to, since they lack the mental capacity
- They have been coerced into because the other person is in a position of trust, power or authority, e.g. a care worker.

Sexual harm can involve bruising or injury to the anal, genital, or abdominal area, and the transmission of STD. It also includes inappropriate touching.

Being forced to watch sexual activity is also a form of sexual exploitation.

Psychological and emotional harm

This is behaviour that causes mental distress or has a harmful effect on an individual's emotional health and development. It can include:

- Mocking, coercing, bullying, verbal attacks, intimidation or harassment

- Demeaning, disrespectful, humiliating, racist, sexist, or sarcastic comments, shouting, swearing or name-calling
- Excessive or unwanted familiarity
- The denial of basic human and civil rights such as self-expression, privacy, and dignity
- Negating the right of the vulnerable adult to make choices
- Undermining the individual's self-esteem
- Isolation and over-dependence that has a harmful effect on the person's emotional health, development, or well-being
- The use of inflexible regimes and lack of choice.

Neglect

Neglect occurs when a person's well-being is impaired because his or her care or social needs are not met.

Examples of neglect include:

- The failure to allow access to appropriate health, social care, and educational services
- The failure to provide adequate nutrition, hydration or heating, or access to appropriate medication
- Ignoring medical or physical needs, e.g. untreated weight loss, or a lack of care that results in pressure sores or uncharacteristic problems with continence
- Poor hygiene, e.g. lack of general cleanliness or soiled clothes not being changed
- The failure to address the vulnerable individual's requests.

Neglect can be intentional or unintentional.

Intentional neglect can include:

- Wilfully failing to provide care
- Wilfully preventing the vulnerable adult from getting the care they need
- Being reckless about the consequences of the person not getting the care they need.

Unintentional neglect can include:

- A carer failing to meet the needs of the vulnerable adult because they do not understand their needs
- A carer lacking knowledge about the services that are available
- A carer's own needs preventing them from being able to give the care the person needs
- An individual being unaware of, or lacking an understanding of, the possible effect on the vulnerable adult of a lack of action.

Discrimination

Discrimination exists when values, beliefs, or culture result in a misuse of power, or the denial of rightful opportunities, so causing harm.

Any psychological abuse that is racist, sexist, or linked to a person's sexuality, disability, religion, ethnic origin, gender, culture, or age, is discriminatory.

Institutional harm

Examples of institutional harm can include:

- An observed lack of dignity and respect in the care setting
- The enforcement of rigid routines
- Processes and tasks being organised to meet the needs of staff rather than those in their care
- Disrespectful language and attitudes.

Financial harm

Financial harm is the use of a person's property, assets, income, funds or other resources without their informed consent or authorisation. It includes:

- Theft
- Fraud
- Exploitation
- Unauthorised withdrawals of funds from an account
- Undue pressure in connection with wills, property, inheritance or financial transactions
- The misuse or misappropriation of property, possessions or benefits
- The misuse of an enduring power of attorney, or a lasting power of attorney, or an appointeeship.

Domestic violence and self-harm should also be considered as possible indicators of, and/or contributory factors to, harm or abuse.

Relevant conduct: Vulnerable adults

A vulnerable adult is a person aged 18 years or over who is receiving a service or assistance which is classed as regulated activity for adults.

Any behaviour is classed as 'relevant conduct' if it:

- Endangers a vulnerable adult or is likely to endanger a vulnerable adult
- If repeated against, or in relation to, a vulnerable adult, would endanger the vulnerable adult or be likely to endanger them
- Involves sexual material relating to children
- Involves sexually explicit images depicting violence against human beings (including possession of such images)
- Is of a sexual nature involving a vulnerable adult.

A person's conduct endangers a vulnerable adult if it:

- Harms a vulnerable adult
- Causes a vulnerable adult to be harmed
- Puts a vulnerable adult at risk of harm
- Makes an attempt to harm a vulnerable adult
- Incites another person to harm a vulnerable adult.

A person's conduct satisfies the 'harm test' if they are thought likely to:

- Harm a vulnerable adult
- Cause a vulnerable adult to be harmed
- Put a vulnerable adult at risk of harm
- Make an attempt to harm a vulnerable adult
- Incite another person to harm a vulnerable adult.