

TOTTENHAM HOTSPUR

SAFEGUARDING ADULTS POLICY

Author: Dayne Matthieu – Head of Safeguarding & Welfare

Co-Author: Sandra Barratt – Foundation Safeguarding Manager

Special thanks to the Tottenham Hotspur Foundation Focus Group for their contributions to the development of this document.

Approved and endorsed by: Matthew Collecott - Director, on behalf of the Directors of Tottenham Hotspur Football and Athletic Co. Ltd (“Tottenham Hotspur”)

COPYRIGHT:

Permission has been given from agencies to use extracts from their publications, which under any other circumstances are protected by copyright. This document is under copyright and reproduction is prohibited without prior written permission from the Head of Safeguarding & Welfare at Tottenham Hotspur.

FOREWORD

This Safeguarding Adults Policy (Policy) reflects the safeguarding ethos of the Club. The Board of Directors endorses this document as part of the Club’s constitution and expect all staff in the workforce community at Tottenham Hotspur to share the Club’s commitment to safeguard and simultaneously promote adult well-being. 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 Policy and Safeguarding Adults Policy are linked to ensure the safety and protection of vulnerable groups.

Matthew Collecott
Operations and Finance Director
on behalf of the Board of Directors
of Tottenham Hotspur Football & Athletic Co. Ltd.



TABLE OF CONTENTS

Introduction to Safeguarding Adults at Tottenham Hotspur

- ↳ Policy Aim
- ↳ Safeguarding Adults Policy Principles
- ↳ Safeguarding Legislation and Guidance
- ↳ Other Related Policies
- ↳ Definitions

Everyone's Responsibility

- ↳ Roles and Responsibilities
- ↳ Best Practice Safeguarding – Six Principles
- ↳ Making Safeguarding Personal
- ↳ Wellbeing Principle
- ↳ Staff Training and Supervision

Safer Recruitment

- ↳ Recruitment Commitment

Appropriate Sharing and Data protection Protocol

- ↳ Safeguarding Confidentiality Statement
- ↳ Storage of Information
- ↳ Files on Adults

Preventing Abuse, Exploitation and Neglect

- ↳ Reporting
- ↳ Disclosure of Abuse
- ↳ COVID-19
- ↳ Reporting Safeguarding Concerns Flow Chart

Appendix – Further Information

- ↳ Safeguarding Organisational Chart
- ↳ Recording and Information Sharing
- ↳ Multi Agency Working
- ↳ PREVENT Duty
- ↳ Key Contact List

INTRODUCTION TO SAFEGUARDING ADULTS AT TOTTENHAM HOTSPUR

This Policy applies to Tottenham Hotspur Football and Athletic Co. Limited (known as 'the Club') and to its Group Companies, Tottenham Hotspur Football Club (trading name), Tottenham Hotspur Foundation (a registered charity – known as 'the Foundation') and Tottenham Hotspur Women's Football Club Ltd. Any references to 'the Club' are therefore intended to apply to the Club, any of its Group Companies, to the Foundation and to the Tottenham Hotspur Women's Team.

The Club believes that children, young people and adults have the right to take part in sport in an environment which is safe and free from any risk of abuse. The Club takes all reasonably practicable steps to minimise harm to everyone involved in Club activities, and discharges its moral and legal responsibility to "protect an adult's right to live in safety, free from abuse and neglect" (*Care and Support statutory guidance, chapter 14.2-updated April 2021*).

The Club will encourage and support partner organisations, including other clubs, suppliers, and sponsors to adopt and demonstrate their commitment to the principles and practice of equality as set out in this policy.

POLICY AIM

This Policy aims to ensure that safeguards are put in place to keep adults safe, and where possible prevent harm from occurring while engaging in Club activities and events.

The Club will do this through its continuous commitment to educate staff, robust recruitment processes and engendering a "vigilant and listening culture", whereby staff understand and are demonstrably committed to the organisational ethos of safeguarding.

SAFEGUARDING ADULTS POLICY PRINCIPLES

The welfare and safety of "adults at risk" is of primary concern

- ✘ Everyone has the right to be treated as an individual
- ✘ All adults at risk have a right to be safe and to be treated with dignity and respect, with a right to privacy
- ✘ All adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse
- ✘ All incidents of suspected poor practice and allegations of abuse will be taken seriously and responded to swiftly and appropriately in line with this policy
- ✘ Confidentiality should be upheld in line with the Freedom of Information Act (2004) and the Data Protection Act 2018 GDPR
- ✘ All Tottenham Hotspur staff, volunteers and partner organisations have a role to play in ensuring that safeguarding responsibilities and commitments are upheld and at the forefront of everything they do
- ✘ All staff are alert to the signs of abuse and neglect and follow reporting procedures to ensure that effective protection and support are considered.
- ✘ The Club recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Board

SAFEGUARDING LEGISLATION AND GUIDANCE

This Policy is influenced and supported by the following legislation and guidance documents:

- ✘ The Care Act 2014 (last update April 2021)
- ✘ The Protection of Freedom Act 2012
- ✘ Safeguarding Vulnerable Groups Act 2006 (Act of Parliament post the Michael Richard inquiry – Soham murders)
- ✘ Human Rights Act 1998
- ✘ Domestic Abuse Act 2021
- ✘ The Counter Terrorism and Border Security Act 2019
- ✘ Sexual Offences Act 2003
- ✘ Mental Capacity Act 2005
- ✘ The Data Protection Act and General Data Protection Regulation 2018
- ✘ Care and Support Statutory Guidance – (last update April 2021)
- ✘ Premier League Safeguarding Policy (2020/2021))
- ✘ Safeguarding Adults in Affiliated Football Policy and Procedures

OTHER RELATED ORGANISATIONAL POLICIES

- ✘ Disclosure and Barring Service Policy
- ✘ Safer Recruitment Policy
- ✘ Safeguarding Children Policy
- ✘ Modern Slavery Policy
- ✘ Managing Allegations Against Staff Policy

DEFINITIONS:

- ✘ Abuse: Refers to the “Acts of commission or omission” that 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
- ✘ Adult at Risk: An adult who has needs for care and support (*whether or not the local authority is meeting any of those needs*) and is experiencing, or is at risk of, abuse or neglect and as a result of those care and support needs is unable to protect himself from either the risk of, or the experience of abuse or neglect. This may include (but is not limited to) people with learning disabilities, sensory impairments, mental health needs, elderly people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example, experiencing domestic violence.
- ✘ Adult in Need of Care and Support: This is determined by a range of factors including personal characteristics, factors associated with their situation, or environment and social factors. Naturally, a person’s disability or frailty does not mean that they will inevitably experience harm or abuse. In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors. In recent years there has been a marked shift away from using the term ‘vulnerable’ to describe adults potentially at risk from harm or abuse.

- ⌘ Allegation: An alleged incident, sufficiently serious as to suggest that harm has taken place or that the alleged behaviour indicates the individual may pose a risk of harm to others.
- ⌘ Alternative Workers: Any individual working on behalf of the Club, who are not considered an “employee” by law (e.g Agency staff, consultants, volunteers etc.)
- ⌘ 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: 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.
- ⌘ Child: Includes everyone under the age of 18.
- ⌘ Child Protection: a set of procedures that are required for specific children who are at risk/or are suffering from significant harm.
- ⌘ Club: Tottenham Hotspur Football and Athletic Co. Ltd: including (Tottenham Hotspur, Spurs, THFC and includes the charitable arm of the Club, Tottenham Hotspur Foundation, Tottenham Hotspur Womens Team), which has adopted the policies and procedures of the Club.
- ⌘ Disability: Physical or sensory impairment or learning disability 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: 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: An action that destroys the relationship of trust between an employer and an employee.
- ⌘ Picture of Need: A 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: Roles where the post holder has power and authority, and may have key influence in the life of others.
- ⌘ Prevention & Response Team: The Club/Foundation/Womens Safeguarding Team with specific specialist responsibilities for the management of safeguarding and child protection.
- ⌘ Radicalisation: The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
- ⌘ Staff: Anyone in paid work who provides services or activities for the Club, and includes the terms: employee and personnel.

EVERYONE’S RESPONSIBILITY

Roles and Responsibility

- ⌘ Governance – Safeguarding Lead (Board Level)
The Club considers the safety and well-being of vulnerable groups as high priority. This is represented from Board level and permeates all aspects of the organisation. The Board has an appointed Safeguarding Lead, who is responsible for governance, ensuring that safeguarding remains a key priority for leadership and is considered in line with whole Club strategic aims and direction of travel.

- ✘ The Chief Executive Officer – Tottenham Hotspur Foundation
The Chief Executive Officer has overarching strategic responsibility for ensuring that all the Foundation's activities are conducted in line with the Board's Safeguarding priorities and that a Safeguarding culture is embedded at all levels of the organisation.

- ✘ Strategic Leadership – Head of Safeguarding & Welfare
The Head of Safeguarding & Welfare has overall responsibility for safeguarding provision and arrangements across all areas of the Club and oversees and leads a team of safeguarding specialist staff. The Safeguarding Team work closely with departments to ensure the quality of safeguarding arrangements, and respond to safeguarding concerns in accordance with legal guidance and expectations.

- ✘ Operational Leadership – Safeguarding Manager – Tottenham Hotspur Foundation
The Foundation Safeguarding Manager has a deputising role to the Head of Safeguarding & Welfare and in their absence is the main point of contact for advice and guidance in response to all safeguarding matters across the Club. The Foundation Safeguarding Manager is mainly responsible for the operational developments and safeguarding response procedures at the Foundation and reports directly into the Head of Safeguarding & Welfare.

- ✘ The Prevention & Response Team
The Club has clearly defined procedures in place to enable safer working practices and outlines what action must be taken where there are safeguarding concerns about actual or suspected incidents of abuse/harm. There are also procedures in place for taking action when allegations are made against adults who work with children and adults at risk.

The Safeguarding Prevention & Response Team lead on safeguarding policy and practice development and ensure effective liaison with statutory agencies when the need arises.

The Prevention & Response Team constitutes :

- a. Safeguarding Officers – Assigned to an area/department
- b. Match/Event Day Duty Safeguarding Officers – Assigned per event
- c. Safeguarding Curriculum Coordinator – Assigned to the Academy

- ✘ Head of Department and Senior Staff – Staff in Leadership Roles

All staff in leadership roles are responsible for:

1. Contributing to safeguarding procedures and systems.
2. Ensuring all staff comply with safeguarding, safer recruitment and safe working practices
3. Championing Safeguarding across all areas of the organisation.

- ✘ All Staff – **(This includes "Alternative Workers")**

- All staff have a responsibility to provide a safe environment for participants/beneficiaries.
- All staff have a responsibility to identify vulnerabilities, and respond by way of reporting concerns to the relevant safeguarding officer
- All staff should respect and abide the Club's Code of Ethics and Conduct.

BEST PRACTICE SAFEGUARDING

The Care Act 2014 sets out the following principles that should underpin safeguarding of adults:

- Empowerment: Be person led - people being supported and encouraged to make their own decisions and informed consent (make safeguarding personal).
- Prevention: It is better to take action before harm occurs – prevention of neglect, harm and abuse is the primary objective.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- 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.

ix Making Safeguarding Personal

Making safeguarding personal means that adult safeguarding should be person led and outcome focussed. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control. As well as improving quality of life, well-being and safety.

Wherever possible discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

x Wellbeing Principle

The concept of wellbeing is enshrined throughout the Care Act and it is one that is relevant to adult safeguarding in sport and activity. Wellbeing is different for each of us. However, the Act sets out broad categories that contribute to our sense of wellbeing. By keeping these themes in mind, we can all ensure that adult participants can take a full part in Club activities and events.

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect
- Control by the individual over their day-to-day life (including over care and support provided and the way they are provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains
- Suitability of the individual's living accommodation
- The individual's contribution to society.

xi Staff Training

It is the responsibility of the Club to ensure that all staff (including Alternative Workers) complete:

- An Organisational Safeguarding Induction, which will include a presentation on the Club's Safeguarding Policies and procedures – New staff
- Role Relevant Safeguarding Training – All staff

Staff in regulated activity roles (e.g teaching, coaching, medical care etc.) will be expected to maintain the necessary safeguarding training competency as is recommended.

Staff who have direct contact and whose role involves the care and supervision of vulnerable groups will have access to support via line management and supervision.

SAFER RECRUITMENT AND SELECTION OF STAFF

Tottenham Hotspur take every precaution to ensure robust vetting procedures for anyone who works with or on behalf of the Club. The organisation applies a thorough and clearly defined method of recruiting staff and contractors in line with best practice. This ensures that all individuals, whatever their role are both competent and safe to work for our organisation. *(For further reading, please see the Safer Recruitment Policy and the Disclosure and Barring Service Policy)*

APPROPRIATE SHARING AND DATA PROTECTION PROTOCOLS

⌘ Safeguarding Confidentiality Statement

All matters relating to adult protection are confidential and information is disclosed in line with Data Protection/Handling guidelines. *(For further reading please see the GDPR Policy)*

⌘ Storage of Information:

Information will be stored and handled in line with the Data Protection Act 2018 and GDPR. Information will be stored separately from other records and in a secure place with access granted to designated people, in line with Club GDPR Policy (that information is accurate, regularly updated, relevant and secure).

The Club has a clear policy on the management of records, confidentiality, and sharing of information. There is an expectation of confidentiality in the recording, use and management of personal information. Management and staff are clear about what information can be shared with relevant people within and outside of the organisation.

⌘ Files on Adults

Concerns are recorded securely and confidentially on an individual basis on the safeguarding electronic case management platform (LOCKER) which is overseen by the Head of Safeguarding & Welfare. Further information on appropriate information sharing is provided in the Appendix.

Preventing Abuse, Exploitation and Neglect

There are different types and patterns of abuse and neglect, and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern.

- Self-Neglect – this covers a wide range of behaviour: neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.
- Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- Domestic Abuse and Coercive Control – including psychological, physical, sexual, financial and emotional abuse. It also includes so called ‘honour’ based violence. It can occur between any family members. *(For further reading, please see the Modern Slavery Policy)*
- Discriminatory Abuse – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.
- Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- Physical Abuse – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Sexual Abuse – including rape, sexual assault, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, or sexual acts to which the adult has not consented or was pressured into consenting.
- Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

There are other forms of abuse which may affect adults that are not listed in the Care Act 2014, but are relevant and worth mentioning in this policy, such as:

- Cyberbullying
- Forced Marriage
- Mate Crime
- Radicalisation

If the actions, or narrative of an adult raises worry this must be discussed with your line manager, and in a timely fashion (within a 24 hour period) reported to a member of the Safeguarding Team.

It is important to remember that an individual's behaviour could be out of character for a variety of reasons that may not necessarily indicate that they are at risk of abuse or harm. However, if concern remains after an initial conversation with the individual, staff must report the concern to the Safeguarding Team, having made an accurate record of the conversations held.

(click the link below for further guidance on reporting a concern)

<https://tottenhamhotspur.unily.com/sites/safeguarding/SitePage/8425/safeguarding>

Reporting

Once a concern is reported, The Head of Safeguarding & Welfare will inform the Club Senior Safeguarding Lead (if the concern is for a participant or staff member at the Foundation, the Foundation Safeguarding Manager will inform the Chief Executive Officer and the Head of Safeguarding & Welfare) of all adult protection concerns within 24 hours of receiving the disclosure/concern and will discuss the plan of action to ensure the safety/well-being of the adult at risk. It is key that staff remember the following:

- It is not your responsibility to decide whether or not an adult has been abused. It is, however, everyone's responsibility to respond to and report concerns.
- If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to your relevant Safeguarding Officer. If the relevant Safeguarding Officer is implicated the concern must be reported directly to the Head of Safeguarding & Welfare.
- If the Head of Safeguarding & Welfare is implicated, then report to the Club's Senior Safeguarding Lead.
- If the Foundation Safeguarding Manager is implicated, then report to the Chief Executive Officer at the Foundation and the Head of Safeguarding & Welfare
- When raising your concern remember "Making Safeguarding Personal". It is good practice to seek the adult's views on what they would like to happen next and to inform the adult you will be passing on your concern.
- It is important when considering your concern that you keep the person informed about any decisions and action taken, and always consider their needs and wishes

The Head of Safeguarding & Welfare/Safeguarding Officer will make the necessary referrals to external agencies such as the Football Association, Premier League, Social Services, Police, CHANNEL (see below, Appendix "Further Information" – section "Notifying the Football Association and the Premier League of Allegations") (see Managing Allegations policy)

Disclosure of Abuse

If an adult has disclosed that they are currently or have historically been a victim of abuse, remember the following key points:

- Do not start your own investigation. Listen to what you are told without leading the conversation. Use T.E.D questions to gain clarity and information:
 - Tell what happened
 - Explain what happened
 - Describe what happened
- Make a note of what the person has said using his or her own words within 24 hours on LOCKER

- Describe the circumstances in which the disclosure came about.
- Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- Remember to make safeguarding personal. Discuss your safeguarding concerns with the adult, obtain their view of what they would like to happen, inform them of your duty to pass on your concerns to the Safeguarding Team.
- Immediately report the disclosure to your nominated Safeguarding Officer or the Head of Safeguarding & Welfare – they will give guidance as to the next best step in ensuring their safety.
- If out of hours and you are unable to speak to a Safeguarding Officer or the Head of Safeguarding, 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.
- If the adult at risk has responsibility for children (under 18's), inform your Safeguarding Officer who will need to consider the Club's policy and procedures for protecting children. (see Safeguarding Children policy)
- Share information on a need-to-know basis only. Do not discuss with colleagues, friends or family
- Seek support for yourself if you are distressed.

Staff must never

- Ask leading questions e.g "Was it Tom who hit you?"
- Promise that they will keep disclosures a secret
- Speak to the alleged abuser about the allegation

IMPORTANT: If an adult starts disclosing, but does not continue when he/she is told that it cannot remain confidential, this must be raised as a concern, and the relevant Safeguarding Officer or Head of Safeguarding & Welfare informed.

COVID 19

The COVID 19 pandemic has increased the vulnerability of many adults and families requiring support and care. The uncertainty of this time creates unexpected anxieties and pressures for all, therefore staff are expected to be sensitive to the needs of all our service users, promoting an ongoing culture of vigilance so that through our Club and Foundation provision/activity delivery, staff remain best placed to identify, report, refer (where necessary) and support those in our care .

The Club will continue to uphold all principles outlined in this policy throughout the period of national lockdown and whilst we remain affected by the COVID 19 pandemic. Tottenham Hotspur will continue to work collaboratively with external agencies, statutory and voluntary to identify and support those most at risk of harm.

When planning and carrying out risk assessments in preparation for service delivery, staff must consider the impact that the COVID 19 pandemic has and is continuing to have on participants, players and on colleagues and the part it plays in:

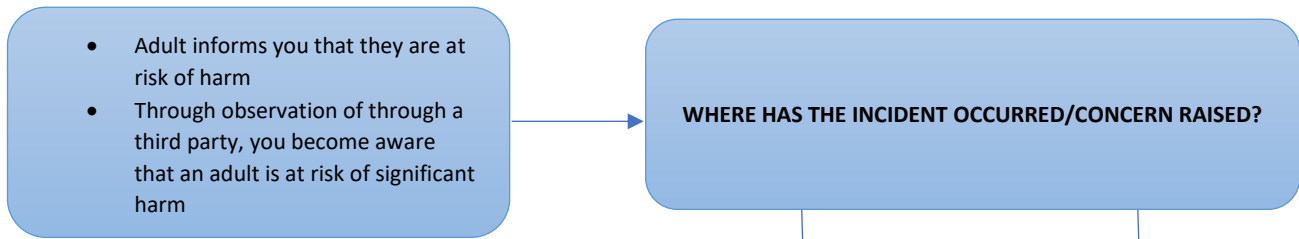
- Escalating anxiety/mental health illness
- Further isolating those who depend on family and friends for every-day life support
- Decreasing the opportunity for contact with services and professional

FURTHER SUPPORT & INFORMATION

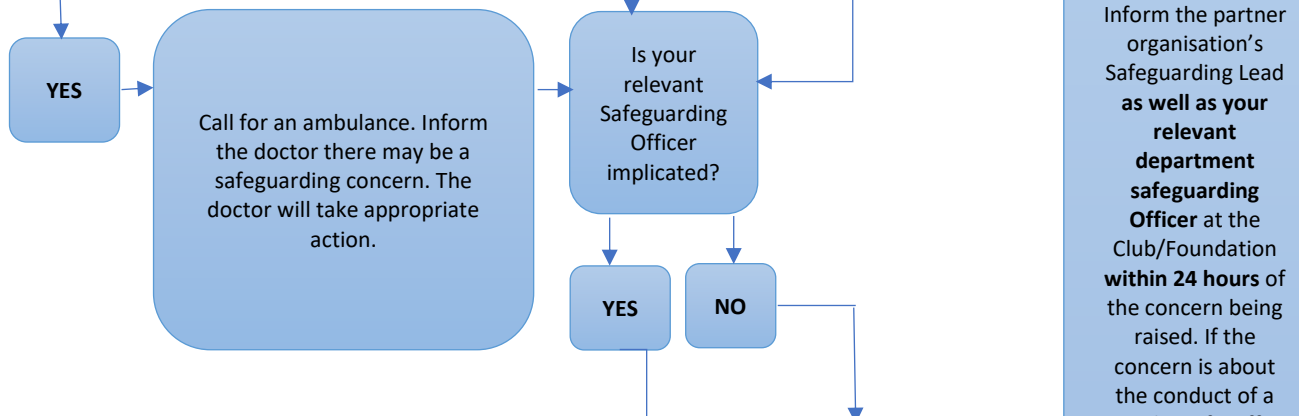
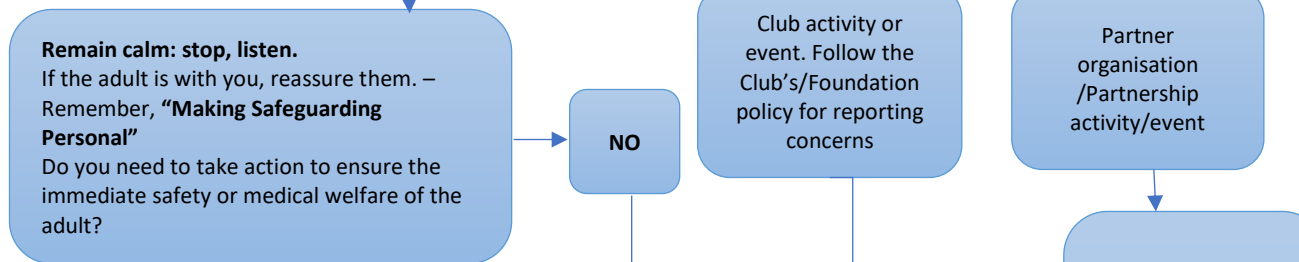
Staff can contact the Head of Safeguarding & Welfare or any member of the Safeguarding Team (see Key Contact List – Appendix) for further information, advice and guidance relating to the safeguarding of adult

SAFEGUARDING ADULTS PROTECTION CONCERNS FLOW CHART

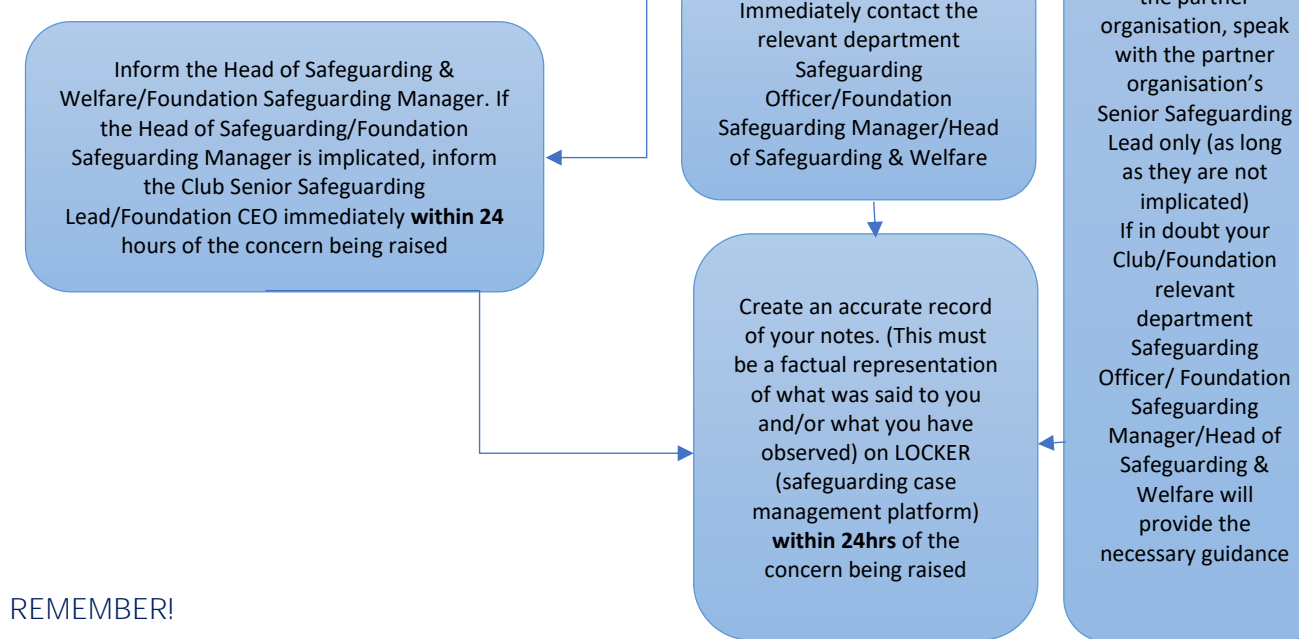
RECOGNISE Possible Concerns



RESPOND Appropriately



REPORT Your Concerns



REMEMBER!

If you are concerned for someone’s safety and believe them to be at significant risk, you must immediately contact your relevant department Safeguarding Officer or the Head of Safeguarding & Welfare/Foundation Safeguarding Manager. in their absence, contact emergency services on **999** and immediately make a factual report on LOCKER **within 24** hours of the concern being brought to your attention

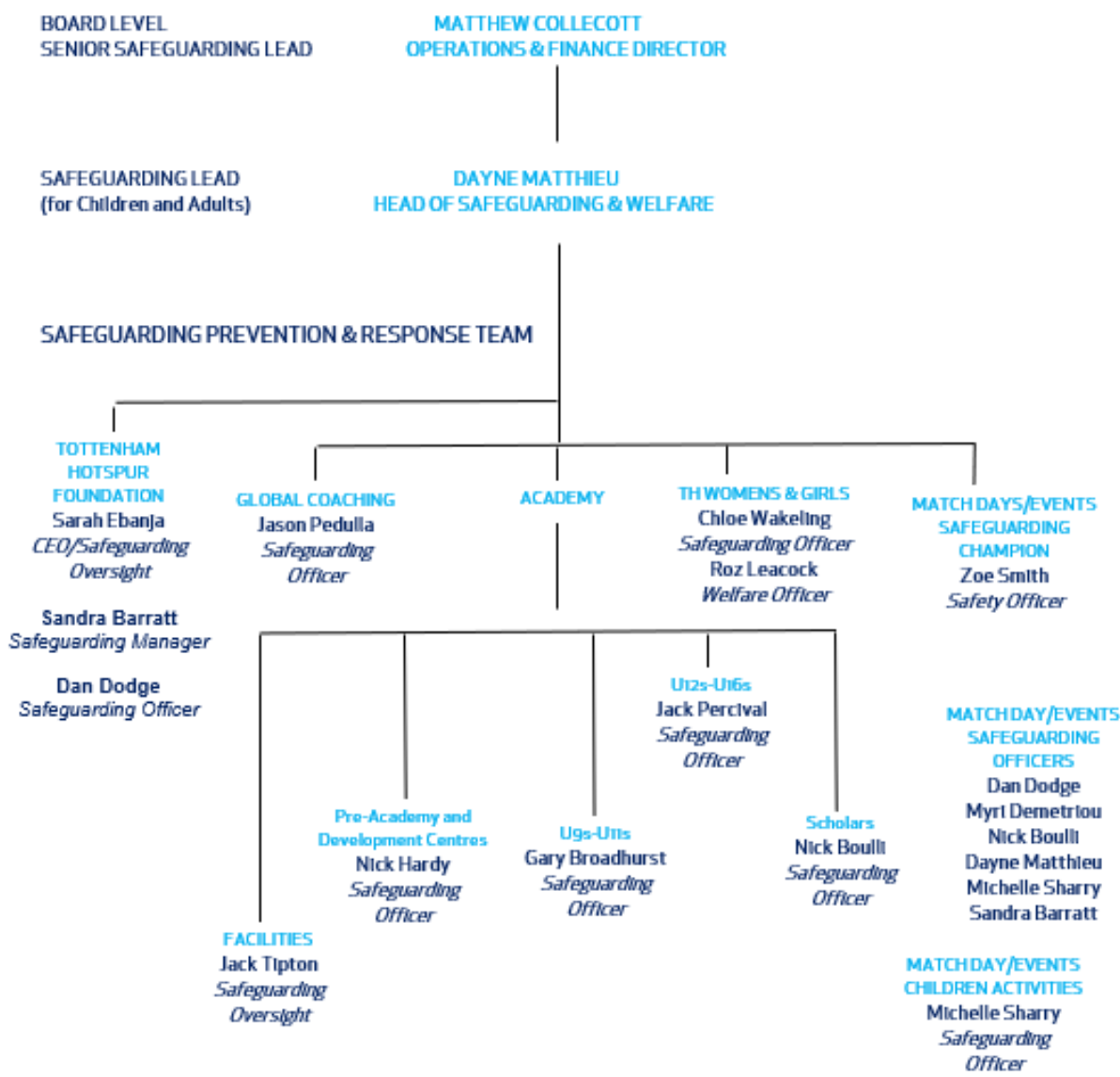
This Policy is subject to regular review to ensure that it is fit for purpose. These reviews take place after all safeguarding concerns and incidents and in line with changes of legislative documents and guidance updates.

Effective Date of Policy: [February 2021]

Policy Owner/Lead: [Dayne Matthieu – Head of Safeguarding & Welfare]

TOTTENHAM HOTSPUR

SAFEGUARDING STRUCTURE



Update: JUNE 2021

Recording and Information Sharing

All sports organisations must comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR). 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 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
- 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.
- 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. The Club 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 activity/ their role in the organisation.

PREVENT Duty

PREVENT is one of the four elements of "CONTEST", the government's counter-terrorism strategy. The four elements are:

- Pursue
- Protect
- Prepare
- 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.

It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.

The PREVENT Duty incorporates the responsibility to promote fundamental British Values through practices and the formal and informal curriculum. British values are defined as;

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of those of 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, i.e.: ISIL (Islamic State), Al-Qaeda, Boko Haram, British Defence League, Animal Rights extremist groups such as SPEAK, Irish Republican Army (IRA), Anti-Abortion groups, to name a few.

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 authorities 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 & Welfare. Where significant risks are identified, the Head of Safeguarding & 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.

Training and Awareness

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

Reporting Extremist Narratives or Radicalisation Concerns

All staff must remember and take seriously their duty of care to report and escalate concerns using the Club's safeguarding reporting process. Staff must bear in mind that isolated concerns may support building a "picture of need", which can identify the appropriate services to support players/participants who may be at risk of extremist views/radicalisation.

The Head of Safeguarding & Welfare/Safeguarding Officers may seek advice from external contacts, including Local and National Prevent Coordinators, to discuss anonymously cases they may be considering for referral. These agencies will provide the support and guidance regarding decisions to refer a case to CHANNEL. For further reading on Channel <https://www.gov.uk/government/publications/channel-guidance>

Notifying the Football Association and the Premier League of Allegations

The Club will notify the relevant Football authorities (the Premier League and The FA) of, and give such further information as they may require in respect of:

1. any allegations involving members of staff (whether current, prospective or former) in respect of children or vulnerable adults;
2. an incident or allegation of 'poor practice' (where it is the third or a subsequent occasion of poor practice, whether or not the relevant incident or allegation is similar in nature to previous incidents or allegations of poor practice) – that is, behaviours which contravene existing codes of conduct, infringe an individual's rights and/or reflect a failure to fulfil high standards of care. It includes things like insufficient care being taken to avoid injuries, allowing abusive or concerning practices to go unreported, allowing embarrassing/harassing practices to go unreported, placing individuals in uncomfortable situations, for example, inappropriate use of social media/messaging with young players etc.;
3. any actions agreed to be taken in respect of the individual; and
4. any allegation of abuse of a child or adult at risk committed by an Academy player or a participant in any activity organised by the Club or the Foundation.

All such matters must be referred to the Premier League and the Football Association as soon as reasonably practicable. Where a referral is made to an 'external agency' (such as the police, the local

authority or the DBS), this must be referred to the football authorities within 24 hours, along with all relevant information and evidence provided to the external agency in respect of the same.

Failure to report a concern about the welfare of a child/vulnerable adult may result in action taken by The FA under its Disciplinary Regulations and/or the Premier League under Rule W.

Key Contact List

Internal

Title/Role	Name	Contact Details
Operations & Finance Director – Safeguarding Lead Board Representative	Matthew Collecott	020 8365 5322 matthew.collecott@tottenhamhotspur.com
Head of Safeguarding & Welfare	Dayne Matthieu	07879997839/02083655118 dayne.matthieu@tottenhamhotspur.com
CEO Foundation	Sarah Ebanja	sarah.ebanja@tottenhamhotspur.com
Head of HR – Safer Recruitment	Lisa Beresford – Hines	hr@tottenhamhotspur.com
Safeguarding Manager - Foundation	Sandra Barratt	07384 818062 sandra.barratt@tottenhamhotspur.com
Safeguarding Officer – Foundation	Dan Dodge	07775 861935 daniel.dodge@tottenhamhotspur.com
Safeguarding Officer Global Development	Jason Pedulla	07384 461340 jason.pedulla@tottenhamhotspur.com
Head of Global Coaching	Andy Rogers	andy.rogers@tottenhamhotspur.com
Safeguarding Officer Womens & Girls	Chloe Wakeling	07384 810246 chloe.wakeling@tottenhamhotspur.com
Head of Womens Football	Heather Cowan	heather.cowan@tottenhamhotspur.com
Welfare Officer Girls Football Development	Roz Leacock	07810 861780 rozana.leacock@thwfc.co.uk
Safeguarding Officer – Pre- Development Academy	Nick Hardy	07469 857946 nick.hardy@tottenhamhotspur.com
Safeguarding Officer Academy U7's – U12's	Gary Broadhurst	07825 176866 gary.broadhurst@tottenhamhotspur.com
Safeguarding Officer Academy U12's – U16's	Jack Percival	07469 855000 jack.percival@tottenhamhotspur.com
Safeguarding Officer Academy Scholars	Nick Boulli	07557 652373 nick.boulli@tottenhamhotspur.com
Academy Manager	Dean Rastrick	dean.rastrick@tottenhamhotspur.com
Academy Operations Manager	Luke Godfrey	07825 840732 luke.godfrey@tottenhamhotspur.com
Academy Player Care Manager	Tina Gold	07387 023642 tina.gold@tottenhamhotspur.com
Lead Safety Officer – Match Day/Events	Eileen Williams	eileen.williams@tottenhamhotspur.com
Safeguarding Officer – Match Day/Events	Myrianthos Demetriou	07775 423507 myrianthos.demetriou@tottenhamhotspur.com

External

Organisation	Contact details
Haringey Safeguarding Adults – First Response Team	Telephone: 020 8489 1400. Email: firstresponseteam@haringey.gov.uk
Enfield Safeguarding Adults	The MASH Team operates Monday to Friday (9am-5pm). If you have an urgent concern after hours you should contact the Enfield Adult Abuse Line on 020 8379 5212
Waltham Forest Safeguarding Adults	To raise an urgent concern call 020 8496 3000 or email safeadults@walthamforest.gov.uk
Barnet Safeguarding Adults	If you are concerned about an adult who may be at risk of abuse, harm or neglect you can make a referral or contact Social Care Direct on 020 8359 5000 (Monday to Friday, 9am - 5pm) or 020 8359 2000 (out of hours).
Haringey PREVENT	Call 020 8489 3884 or 020 8489 1280 (office hours only). Email: prevent@haringey.gov.uk . Karina Kaur – Strategic Lead of communities - 07976953191
Enfield PREVENT	Email prevent@enfield.gov.uk or email: Sujeevan.Ponnampalam@enfield.gov.uk
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 Helplines	England: Tel: 0808 2000 247 www.nationaldahelpline.org.uk/Contact-us Northern Ireland: Tel: 0808 802 1414 www.dsahelpline.org Scotland: Tel: 0800 027 1234 Email: helpline@sdfmh.org.uk Wales: Llinell Gymorth Byw HebOfn/ Live free from fear helpline Tel: 0808 8010 800 Type Talk: 18001 0808 801 0800 Text: 078600 77 333
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.

	<p>Tel: 020 7383 0700 or 0808 808 0700 (Helpline) Email: services@respond.org.uk</p>
Stop Hate Crime	<p>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</p>
Susy Lamplugh Trust	<p>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</p>
Victim Support	<p>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</p>
Women's Aid Federation of England and Wales	<p>Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service. www.womensaid.org.uk/information-support</p>
Premier League Safeguarding team	<p>Jess Addicot (Head of Safeguarding): 07917 204890 or email jaddicot@premierleague.com or safeguarding@premierleague.com</p>
FA	<p>David Gregson (Safeguarding Investigations Manager): 0800 1691863 ext 6838. david.gregson@TheFA.com</p>