SAFEGUARDING ADULTS AT RISK POLICY

2026-2027

BURNLEY

Burnley Football Club & Burnley FC in the Communit

Policy Forword

Burnley Football Club and Burnley Football Club in the Community are committed to creating opportunities which enable adults at risk with care and support needs to participate in activities safely in accordance with the Care Act 2014. The participation of adults at risk may be as players, coaches, carers, employees, volunteers, officials, administrators, or spectators.

We have a moral, legal and social responsibility to provide positive, enjoyable, and safe environments for all those taking part in activities, and we share a commitment to manage and respond to allegations of abuse, harassment or discrimination.

This policy will provide details of different types of abuse, guidance on consent and procedures for reporting and recording concerns. This policy is written to protect adults at risk of harm who engage with BFC/BFCitC in any capacity.

For clarification, this policy applies to all activities, departments, and areas of Burnley FC and Burnley FC in the Community, including the Men's and Women's 1st Teams, Boys Academy and Girls ETC (managed through BFCitC). From here on in, the mention of 'BFC' or 'BFCitC' is read to mean all of the above.

Signed:

Dated: 9th September 2026

Matt Williams, Chief Operating Officer,
Burnley Football Club

Signed:

Dated: 9th September 2026

Helen Gurman, Chief Executive Officer,
Burnley FC in the Community

1. OUR SAFEGUARDING COMMITMENT

Burnley Football Club ("BFC") and Burnley FC in the Community ("BFCitC") are committed to safeguarding and promoting the welfare and wellbeing of adults at risk.

We believe that every person has the right to live free from abuse, neglect, exploitation and harm and to be treated with dignity, respect and compassion.

Safeguarding is everyone's responsibility. We are committed to creating and maintaining safe, inclusive and positive environments where adults feel valued, listened to and supported, and where concerns about safety or wellbeing are taken seriously and responded to appropriately.

Our approach to safeguarding adults is person-centred and outcome-focused. Wherever possible, we will involve adults in decisions affecting their safety and wellbeing, listen to their views, wishes and desired outcomes, and support them to make informed decisions about their own lives.

We recognise that adults have the right to make their own choices, including decisions that others may consider unwise, where they have the capacity to do so. However, there may be circumstances where we need to share information or act without an individual's consent to protect them or others from abuse, neglect or serious harm.

BFC and BFCitC are committed to:

- promoting the safety, welfare and wellbeing of adults at risk;
- preventing abuse, neglect, exploitation and poor practice;
- creating environments where people feel safe to raise concerns and know how to seek help;
- listening to and involving adults in safeguarding decisions wherever possible;
- responding promptly, appropriately and proportionately to safeguarding concerns;
- maintaining clear professional boundaries and promoting appropriate behaviour;
- working in partnership with statutory agencies, football authorities and other relevant organisations;
- sharing information lawfully, appropriately and in the interests of safeguarding;
- providing appropriate safeguarding training, guidance and support to our workforce;
- maintaining effective safeguarding governance, oversight and accountability; and
- continuously reviewing and improving our safeguarding practice.

We expect everyone working for, representing or acting on behalf of BFC and BFCitC to share this commitment and play their part in creating an ever-safer culture.

2. PURPOSE AND SCOPE

Purpose

The purpose of this policy is to provide a clear framework for how Burnley Football Club ("BFC") and Burnley FC in the Community ("BFCitC") safeguard adults at risk.
It sets out our commitment to preventing abuse, neglect, exploitation and harm, and provides clear expectations for those working for or on behalf of BFC and BFCitC in recognising, responding to and reporting safeguarding concerns.

This policy should be read alongside our safeguarding procedures and other relevant organisational policies and guidance.

Scope

This policy applies to all activities, services and environments delivered, organised or supported by BFC and BFCitC.

It applies to all members of our workforce, including:

- employees;
- players and coaching staff;
- casual, temporary and agency workers;
- volunteers and trustees;

- contractors, consultants and suppliers;
- students and work experience placements; and
- anyone undertaking work or activity on behalf of BFC or BFCitC.

The policy applies across all areas of our organisations, including football, community programmes, education, events, hospitality, matchdays, stadium operations, tours, travel, accommodation and online environments.

We also expect organisations and individuals delivering services or activities on behalf of BFC or BFCitC to maintain appropriate safeguarding arrangements and to meet our safeguarding expectations.

This policy applies regardless of where an activity takes place and includes concerns that arise within our environments or where concerns about an adult's safety or wellbeing are identified outside of our activities.
This policy applies to concerns involving adults at risk who are employees, players, participants, supporters, visitors or otherwise come into contact with BFC or BFCitC.

All safeguarding concerns must be taken seriously and reported in accordance with this policy and the relevant safeguarding procedures.

3. WHO IS AN ADULT AT RISK?

The Care Act 2014 defines an adult at risk as a person aged 18 or over who:

- has needs for care and support, whether or not those needs are being met;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves from the risk or experience of abuse or neglect.

All three elements of this definition should normally be considered when determining whether an individual meets the statutory definition of an adult at risk.

An adult may have care and support needs for a range of reasons. These may include, but are not limited to, physical or sensory impairment, learning disability, mental health needs, acquired brain injury, age, illness or other circumstances that may affect their ability to protect themselves from abuse or neglect.

However, having a disability, health condition or support need does not automatically mean that someone is unable to protect themselves or meets the statutory definition of an adult at risk.

We recognise that an individual's circumstances, needs and level of risk may change over time. We will therefore consider the individual circumstances of each person and respond to safeguarding concerns proportionately and appropriately.

Safeguarding responsibilities may also arise in circumstances where an individual does not meet the statutory definition of an adult at risk. BFC and BFCitC will take appropriate action where there are concerns about the safety, welfare or wellbeing of any adult who comes into contact with our organisations or activities.

4. SAFEGUARDING PRINCIPLES AND PERSON-CENTRED PRACTICE

Our approach to safeguarding adults is guided by the six principles set out in the Care Act 2014.

Empowerment
People should be supported and encouraged to make their own decisions and give informed consent.

Prevention
It is better to take action to prevent abuse and neglect before it occurs.

Proportionality
The response to safeguarding concerns should be proportionate to the level of risk and the least intrusive approach appropriate to the circumstances.

Protection
Adults experiencing, or at risk of, abuse or neglect should receive appropriate support and protection.

Partnership
Safeguarding is most effective when organisations, agencies, communities, families and support networks work together to prevent and respond to abuse and neglect.

Accountability
There should be clear accountability, transparency and oversight in safeguarding decision-making and practice.

PERSON-CENTRED AND OUTCOME-FOCUSED SAFEGUARDING

Adult safeguarding should be person-centred and outcome-focused. Wherever possible, adults should be involved in discussions and decisions about safeguarding concerns affecting them. We will seek to understand their views, wishes and desired outcomes and ensure these are considered throughout the safeguarding process.

We will support adults to understand the options available to them and to make informed decisions about their safety and wellbeing. This includes providing information in a way that is accessible and appropriate to their individual communication needs.

We recognise that adults have the right to make decisions about their own lives, including decisions that others may consider unwise, where they have the mental capacity to make those decisions.

The adult's wishes will normally guide our response. However, there may be circumstances where information needs to be shared or action taken without consent, including where:

- there is a risk of serious harm to the individual or another person;
- other adults or children may be at risk;
- a serious criminal offence has been committed or may be committed;
- the individual lacks the mental capacity to make a relevant decision; or
- there is another legal or overriding public interest reason to share information or take action.

Any decision to act without an individual's consent will be necessary, proportionate and clearly recorded.

5. ROLES AND RESPONSIBILITIES

Safeguarding is everyone's responsibility. BFC and BFCitC have clear safeguarding structures, roles and responsibilities to ensure appropriate leadership, accountability and oversight across all areas of our organisations.

THE BOARD
The Boards of BFC and BFCitC have ultimate responsibility for ensuring that appropriate safeguarding arrangements are in place and that safeguarding is embedded within the governance, culture and activities of their respective organisations.

The Boards will:

- maintain appropriate oversight of safeguarding arrangements, risks and performance;
- ensure that safeguarding is appropriately resourced;
- appoint a Board-level Safeguarding Lead with responsibility for safeguarding oversight;
- receive regular safeguarding reports and assurance regarding safeguarding practice and compliance;
- ensure that safeguarding is considered within organisational decision-making and risk management; and
- support a culture where safeguarding concerns can be raised, challenged and responded to appropriately.

SENIOR SAFEGUARDING LEAD

The Senior Safeguarding Lead, for both BFC and BFCitC, provides leadership and Board-level oversight of safeguarding across BFC and BFCitC.

The Senior Safeguarding Lead will:

- provide leadership and challenge in relation to safeguarding;
- support the implementation and development of safeguarding strategy and arrangements;
- maintain appropriate oversight of safeguarding risks, performance and compliance;
- support the Head of Safeguarding and Safeguarding Team in maintaining effective safeguarding arrangements.

HEAD OF SAFEGUARDING

The Head of Safeguarding is responsible for strategic vision and leading and coordinating safeguarding across BFC and BFCitC.

The Head of Safeguarding will:

- provide professional leadership and advice on safeguarding matters;
- oversee the implementation of safeguarding policies, procedures and standards;
- provide assurance and report to the relevant Boards and senior leadership structures; and
- provide assurance and report to the relevant Boards and senior leadership structures;
- manage and coordinate safeguarding concerns, referrals and responses;
- provide safeguarding advice, guidance and support to staff and volunteers;
- ensure appropriate liaison with statutory agencies, football authorities and other relevant organisations;
- oversee safeguarding training, safer recruitment and safeguarding compliance;
- monitor safeguarding performance, risks, themes and learning;
- maintain appropriate safeguarding records and oversight of the safeguarding recording system; and
- report safeguarding matters through the appropriate governance and leadership structures.

SAFEGUARDING TEAM

BFC and BFCitC maintain a Safeguarding Team consisting of appropriately trained and experienced safeguarding professionals.

Members of the Safeguarding Team support the implementation of safeguarding arrangements within their areas of responsibility and provide advice, guidance and support to staff, volunteers, participants and others engaging with BFC and BFCitC.

Specific safeguarding responsibilities and reporting arrangements are communicated across the organisations to ensure that staff and others know who to contact for safeguarding advice and support.

MANAGERS AND LEADERS

Managers and leaders have a responsibility to promote safeguarding within their areas of responsibility and to ensure that staff understand and fulfil their safeguarding responsibilities.

Managers and leaders will:

- promote a positive safeguarding culture;
- ensure staff understand how to recognise and report safeguarding concerns;
- respond appropriately to safeguarding concerns raised within their area;
- support staff to access appropriate safeguarding training and guidance;
- challenge poor practice and inappropriate behaviour; and
- work with the Safeguarding Team to manage safeguarding risks and concerns.

STAFF, PLAYERS AND VOLUNTEERS

Everyone working for, representing or participating in activities on behalf of BFC and BFCitC has a responsibility to safeguard adults at risk.

All staff, players and volunteers must:

- understand and comply with this policy and relevant safeguarding procedures;
- maintain appropriate professional boundaries and standards of behaviour;
- remain alert to safeguarding concerns, abuse, neglect and poor practice;
- take concerns seriously and report them without delay;
- cooperate with safeguarding enquiries, investigations and reviews where required;
- complete required safeguarding training and keep their knowledge up to date; and
- contribute to creating safe, inclusive and respectful environments.

No individual is expected to investigate safeguarding concerns. Their responsibility is to recognise concerns, respond appropriately, record relevant information and report the matter through the appropriate safeguarding arrangements.

PARTNERS, CONTRACTORS AND THIRD PARTIES

Organisations and individuals delivering services or activities on behalf of BFC or BFCitC are expected to maintain appropriate safeguarding arrangements and comply with relevant contractual and organisational safeguarding requirements.

Where safeguarding responsibilities are shared with another organisation, roles and responsibilities should be clearly understood and agreed.

6. PROFESSIONAL BOUNDARIES, POSITION OF TRUST AND POOR PRACTICE

PROFESSIONAL BOUNDARIES

Everyone working for or representing BFC and BFCitC must maintain appropriate professional boundaries when working with adults at risk.

Professional relationships must always be based on trust, respect and appropriate behaviour. Staff, players and volunteers must recognise the potential influence or power they may hold because of their role and must never misuse their position for personal, financial, sexual or other advantage.

Appropriate professional boundaries must be maintained across all environments, including face-to-face contact, travel and accommodation, social activities and online or digital communication.

POSITION OF TRUST

A position of trust may arise where an individual has responsibility for, authority over or influence in relation to an adult at risk.

Those in positions of trust must understand the power and influence associated with their role and must not abuse or misuse that position.

Individuals must not:

- use their position to gain inappropriate access to, or misuse, personal or confidential information;
- use their position to intimidate, threaten, coerce, manipulate or exploit another person;
- use their role or status to establish inappropriate relationships;
- engage in behaviour that exploits an imbalance of power or dependency;
- seek personal, financial or sexual advantage from their relationship with an adult at risk; or
- behave in any way that may compromise their professional responsibilities or the safety and wellbeing of others.

Professional boundaries must be maintained even where a relationship appears consensual or where the adult does not identify concerns about the relationship.

POOR PRACTICE

Poor practice is behaviour that falls below the expected standards of BFC and BFCitC and may create an unsafe, inappropriate or uncomfortable environment.

Poor practice may be unintentional. However, this does not mean it should be ignored. Poor practice that is not identified and addressed may increase the risk of harm or develop into more serious safeguarding concerns.

Examples of poor practice may include:

- failing to follow safeguarding policies, procedures or codes of conduct;
- failing to report safeguarding concerns, abuse or inappropriate behaviour;
- ignoring or failing to respond appropriately to concerns raised by others;
- inappropriate or excessive criticism, humiliation, bullying or ridicule;
- allowing bullying, harassment, hazing or initiation practices to take place;
- showing unnecessary favouritism or consistently treating an individual unfairly;
- inappropriate communication or contact, including through social media or other digital platforms;
- placing an adult at risk in avoidable compromising or uncomfortable situations;
- failing to maintain appropriate professional boundaries;
- ignoring relevant health, safety or welfare requirements; or
- any other behaviour that falls below the standards expected by BFC and BFCitC.

Concerns about poor practice must be taken seriously and reported through the appropriate management or safeguarding arrangements.

Where poor practice creates, or may create, a risk of harm to an adult at risk, it must be treated as a safeguarding concern and reported without delay.

7. RECOGNISING ABUSE AND HARM

Abuse and neglect can take place anywhere and may be carried out by anyone. It can occur within a person's home, community, workplace, online or within an organised activity or service.

The person responsible for abuse or neglect may be a family member, friend, partner, carer, colleague, professional, volunteer, another participant or a stranger.

Abuse may consist of a single act or repeated acts. It may be deliberate or result from neglect, poor practice or a failure to act. Abuse can occur through direct action or through a failure to provide appropriate care, support or protection.

It is important to recognise that safeguarding concerns may not always be immediately obvious. Individual concerns may appear minor when considered in isolation but may become more significant when viewed alongside other information or patterns of behaviour.

Staff, players and volunteers should remain alert to changes in behaviour, appearance, circumstances or relationships that may indicate that an adult is experiencing, or is at risk of, abuse or neglect.

TYPES OF ABUSE AND NEGLECT

The Care Act 2014 identifies ten categories of abuse and neglect:

Physical Abuse
Including assault, hitting, slapping, pushing, kicking, inappropriate restraint and the misuse of medication.

Domestic Abuse
Including psychological, physical, sexual, financial and emotional abuse, as well as controlling or coercive behaviour within intimate or family relationships.

Sexual Abuse
Including rape, sexual assault, sexual harassment, inappropriate touching, sexual exploitation or sexual activity to which a person has not consented or is unable to consent.

Psychological or Emotional Abuse
Including threats, intimidation, humiliation, verbal abuse, coercion, controlling behaviour, harassment, isolation or withdrawal from supportive networks.

Financial or Material Abuse
Including theft, fraud, exploitation, pressure relating to money or property, misuse of benefits or financial transactions, and the misuse or theft of possessions.

Modern Slavery
Including slavery, human trafficking, forced labour, compulsory labour and domestic servitude.

Discriminatory Abuse
Including harassment, bullying, slurs, unfair treatment or other forms of abuse based on a person's protected characteristics or other personal characteristics.

Organisational Abuse
Including neglect, poor care practice or inappropriate systems, processes, cultures or behaviours within an organisation or service that result in abuse or neglect.

Neglect and Acts of Omission
Including ignoring medical, physical or emotional care needs, failing to provide access to appropriate care or support, or withholding necessities of life.

Self-Neglect
Including behaviour that results in an individual neglecting their personal hygiene, health, wellbeing or surroundings. This may include hoarding where it creates significant risks to the individual or others.

OTHER SAFEGUARDING CONCERNS

Although not specific categories of abuse under the Care Act 2014, other forms of harm and safeguarding concerns may include:

- cyberbullying and online abuse;
- exploitation;
- forced marriage;
- so-called "mate crime" and cuckooing;
- radicalisation and extremism;
- harassment, stalking and sexual harassment;
- hate crime;
- trafficking;
- honor-based abuse; and
- other forms of coercion, manipulation or exploitation.

This list is not exhaustive. Any behaviour or circumstance that causes concern about an adult's safety, welfare or wellbeing should be taken seriously and reported through the appropriate safeguarding arrangements.

NON-RECENT ABUSE

A disclosure or concern relating to abuse that happened in the past must always be taken seriously, regardless of when the abuse occurred.

Non-recent abuse may relate to abuse experienced during adulthood or abuse experienced during childhood.

It is never too late for an individual to disclose or report abuse.

Where an adult discloses non-recent abuse, they should be listened to, treated with respect and supported appropriately. The concern must be reported to the Safeguarding Team, who will consider the appropriate response, including whether there are any current safeguarding risks to the individual or others.

Concerns relating to non-recent child abuse will be managed in accordance with the relevant children's safeguarding procedures.

8. RESPONDING TO SAFEGUARDING CONCERNS AND DISCLOSURES

Everyone has a responsibility to respond appropriately when they become aware of, suspect or receive a disclosure of abuse, neglect or other safeguarding concerns.

Safeguarding concerns may arise through a direct disclosure, observation, information provided by another person or agency, or concerns about changes in an individual's behaviour or circumstances.
All concerns must be taken seriously and acted upon without delay.

IMMEDIATE SAFETY

The immediate safety and wellbeing of the adult and others must always be considered.
Where there is an immediate risk of harm or a medical emergency, appropriate emergency services must be contacted without delay.

Where possible and appropriate, action should be taken to remove or reduce any immediate risk while avoiding unnecessary disruption or distress to the individual.

RESPONDING TO A DISCLOSURE OR CONCERN

When responding to a safeguarding concern or disclosure:

- remain calm and listen carefully;
- take the individual seriously;
- provide reassurance and explain that they have done the right thing by raising their concerns;
- allow the individual to speak freely and use their own words;
- avoid asking unnecessary or leading questions;
- do not investigate or attempt to establish whether the concern is true;
- do not make promises that cannot be kept, including promises of confidentiality;
- explain what will happen next and who the information may need to be shared with;
- where possible, seek to understand the individual's wishes and desired outcomes;
- consider any immediate safety, medical or support needs;
- report the concern to the Safeguarding Team without delay; and
- make an accurate record of the concern as soon as possible.

DO NOT

When responding to a safeguarding concern or disclosure, do not:

- promise to keep information secret or confidential;
- investigate the concern or question the individual in detail;
- ask leading or suggestive questions;
- express disbelief, shock or judgement;
- blame the individual or suggest they are responsible for what has happened;
- confront or contact the alleged perpetrator;
- discuss the concern with people who do not need to know; or
- delay reporting the concern.

REPORTING SAFEGUARDING CONCERNS

Safeguarding concerns must be reported to the Safeguarding Team without delay and recorded on MyConcern in

accordance with the relevant safeguarding procedures.

In an emergency, where there is an immediate risk of harm or a serious threat to life or safety, staff should contact the emergency services before reporting the matter to the Safeguarding Team.

If the concern relates to a member of the Safeguarding Team, or there is any reason why it would not be appropriate to report the matter to them, the concern must be reported through an alternative safeguarding or senior management route.

No individual is expected to investigate a safeguarding concern. The role of staff, players and volunteers is to recognise concerns, respond appropriately, record relevant information and report the matter through the appropriate safeguarding arrangements.

INVOLVING THE ADULT

Wherever possible, the adult should be informed and involved in decisions about the safeguarding concern.

The Safeguarding Team will seek to understand the adult's views, wishes and desired outcomes and will consider these when determining the appropriate response.

However, there may be circumstances where information must be shared or action taken without the individual's consent. This may include where there is an immediate or significant risk of harm, another person may be at risk, a serious criminal offence has been committed, or there is another overriding legal or public interest reason to act.

Further guidance regarding consent, mental capacity and information sharing is provided later in this policy.

9. CONSENT, MENTAL CAPACITY AND INFORMATION SHARING

CONSENT

Adult safeguarding should, wherever possible, be undertaken with the knowledge and involvement of the adult concerned.

We will seek to understand the adult's views, wishes and desired outcomes and, where appropriate, seek their consent before sharing information or making a referral to another agency.

However, consent is not always required to share safeguarding information or take action. Information may need to be shared without consent where there is a lawful or overriding reason to do so, including where:

- there is a risk of serious harm to the individual or another person;
- other adults or children may be at risk;
- a criminal offence has been committed or may be committed;
- the individual lacks the mental capacity to make a relevant decision; or
- there is another legal or substantial public interest reason to share information.

Where information is shared without consent, the reasons for doing so must be clearly recorded.

MENTAL CAPACITY

The Mental Capacity Act 2005 provides the legal framework for supporting and protecting individuals who may lack the capacity to make specific decisions.

All adults must be presumed to have the capacity to make their own decisions unless it is established otherwise.

A person must be supported to make their own decisions wherever possible. A person should not be considered unable to make a decision simply because they make a decision that others consider unwise.
Where an individual is assessed as lacking the capacity to make a specific decision, any action taken on their behalf must be in their best interests and, where possible, be the least restrictive option available.

The five key principles of the Mental Capacity Act are:

1. A person must be assumed to have capacity unless it is established that they lack capacity.
2. A person must be given all practicable support to make a decision before they are treated as unable to do so.
3. A person must not be treated as unable to make a decision simply because they make an unwise decision.
4. Any action or decision made on behalf of a person who lacks capacity must be made in their best interests.
5. Any action or decision taken must be the least restrictive option available.

Questions about an individual's mental capacity should be considered carefully and should not be based solely on assumptions about a person's disability, age, diagnosis or appearance.

Where there are concerns regarding an individual's capacity to make a relevant decision, advice should be sought from the Safeguarding Team and, where appropriate, relevant health, social care or other professionals.

INFORMATION SHARING

Effective safeguarding depends on appropriate and timely information sharing.
Personal information must be handled in accordance with relevant data protection legislation and organisational policies. Data protection legislation is not a barrier to sharing information where there is a lawful basis or overriding safeguarding reason to do so.

When sharing safeguarding information, BFC and BFCitC will ensure that information is:

- necessary and proportionate;
- relevant and accurate;
- shared with the appropriate people or organisations;
- shared securely and only on a need-to-know basis; and
- appropriately recorded.

Wherever possible, individuals should be informed about how their information will be used and shared, unless doing so would increase the risk of harm or compromise a safeguarding response.

Decisions about whether to share or withhold safeguarding information should be recorded, including the rationale for the decision.

Where there is uncertainty about whether information should be shared, advice should be sought from the Safeguarding Team.

10. RECORDING, CONFIDENTIALITY AND DATA PROTECTION
RECORDING SAFEGUARDING CONCERNS

Accurate and timely recording is an essential part of effective safeguarding practice.

All safeguarding concerns, disclosures, allegations and relevant decisions must be recorded on MyConcern as soon as possible and in accordance with the relevant safeguarding procedures.

Records should:

- be clear, factual and accurate;
- distinguish between fact, opinion and professional judgement;
- include the date, time and location of relevant events where known;
- record the individual's own words where appropriate;
- include details of any action taken;
- record the adult's views, wishes and desired outcomes where known;
- record decisions regarding consent and information sharing, including the rationale for those decisions; and
- be completed and stored securely.

Staff must not alter or delete safeguarding records. Where an error needs to be corrected, this must be done in a way that maintains an appropriate audit trail.

CONFIDENTIALITY

Safeguarding information is confidential and must be handled sensitively and appropriately.
Information will only be shared with those who need to know in order to protect an individual, manage a safeguarding concern or fulfil a legal or professional responsibility.

Staff must never promise an individual that information will be kept secret. Where possible, individuals should be informed about what information will be shared, with whom and why.

Information may be shared without an individual's consent where there is a lawful or overriding safeguarding reason to do so. Further information regarding consent and information sharing is set out in Section 9 of this policy.

DATA PROTECTION AND STORAGE

Safeguarding information is personal and sensitive information and must be processed, stored and shared in accordance with relevant data protection legislation and organisational policies.

Safeguarding records will be stored securely, with access restricted to those with an appropriate safeguarding or professional responsibility.

BFC and BFCitC will retain safeguarding records in accordance with their Records Retention Policy and applicable legal, regulatory and football authority requirements.

The retention and disposal of safeguarding records will take account of the nature of the information, safeguarding responsibilities, potential future need for the information and any relevant legal or regulatory requirements.

Safeguarding records must not be retained or destroyed outside of approved organisational processes.

11. MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

BFC and BFCitC take all allegations and concerns relating to the behaviour of staff, players, volunteers, contractors or others working on behalf of the organisations seriously.

Concerns may arise where an individual has:

- behaved in a way that has harmed, or may have harmed, an adult at risk;
- committed, or may have committed, a criminal offence involving an adult at risk;
- behaved in a way that indicates they may pose a risk of harm to adults at risk; or
- demonstrated behaviour or practice that raises concerns about their suitability to work with adults at risk.

Any allegation or concern must be reported immediately to the Head of Safeguarding or an appropriate member of the Safeguarding Team.

Where the concern relates to a member of the Safeguarding Team, or there is any reason why it would be inappropriate to report the matter to them, the concern must be reported through an alternative safeguarding or senior management route.

Safeguarding concerns and allegations against staff or volunteers will be managed in accordance with the BFC and BFCitC Managing Allegations Against Staff Procedure.

Where appropriate, the Safeguarding Team will liaise with relevant statutory agencies, football authorities, Human Resources and other professionals to ensure that safeguarding, employment and regulatory responsibilities are managed appropriately.

No internal investigation should begin without appropriate consultation where there is a possibility that doing so could compromise a police investigation, safeguarding enquiry or other external process.

Appropriate support will be considered for all individuals affected by an allegation or safeguarding concern, including

the adult raising or experiencing the concern and the individual subject to the allegation.

Confidentiality will be maintained on a need-to-know basis and information will only be shared where necessary and appropriate.

12. SAFER RECRUITMENT AND SAFEGUARDING TRAINING

SAFER RECRUITMENT

BFC and BFCitC are committed to safer recruitment and recognise the importance of ensuring that appropriate steps are taken to prevent unsuitable individuals from working with children and adults at risk.
All recruitment will be undertaken in accordance with the BFC and BFCitC Safer Recruitment Policy and relevant legal, regulatory and football authority requirements.

Appropriate safeguarding checks and recruitment processes will be applied according to the nature of the role and the level of contact or responsibility an individual may have in relation to children or adults at risk.
Safeguarding responsibilities and expectations will form part of the recruitment, induction and ongoing management of relevant staff and volunteers.

SAFEGUARDING TRAINING

BFC and BFCitC will ensure that staff, players and volunteers receive safeguarding information, training and guidance appropriate to their role and responsibilities. This will either be via our online platform or face to face, or a combination of both.

Safeguarding training will support individuals to understand:

- their safeguarding responsibilities;
- how to recognise signs of abuse, neglect, exploitation and poor practice;
- how to respond appropriately to safeguarding concerns or disclosures;
- how and when to report concerns;
- the importance of professional boundaries and appropriate behaviour;
- relevant policies, procedures and codes of conduct; and
- how to access safeguarding advice and support.

Safeguarding training requirements will be determined according to the role, responsibilities and level of contact an individual has with children or adults at risk.

Training will be reviewed and refreshed in accordance with organisational requirements and relevant football league Safeguarding Standards.

Safeguarding responsibilities will also form part of the induction process for relevant staff, players and volunteers.

BFC and BFCitC will maintain appropriate records of safeguarding training and compliance and will monitor completion to ensure required standards are met.

13. WORKING WITH PARTNERS, CONTRACTORS AND THIRD PARTIES

BFC and BFCitC recognise that safeguarding responsibilities extend to activities, services and events delivered in partnership with, or on behalf of, the organisations.

Where children or adults at risk may be involved in an activity, appropriate safeguarding arrangements must be considered when working with partners, contractors, external agencies and third-party organisations.

Before entering into, or commencing, relevant arrangements, BFC and BFCitC will take appropriate steps to satisfy themselves that safeguarding responsibilities and expectations are clearly understood and appropriately managed.

This may include consideration of:

- safeguarding policies, procedures and reporting arrangements;

- safer recruitment and appropriate vetting processes;
- safeguarding training and competence;
- named safeguarding responsibilities and points of contact;
- information sharing and escalation arrangements;
- risk assessment and management arrangements;
- professional standards and codes of conduct; and
- arrangements for responding to safeguarding concerns or allegations.

Safeguarding expectations should be clearly communicated and, where appropriate, reflected within contracts, service level agreements, partnership agreements or other formal arrangements.

Where an activity involves shared safeguarding responsibilities, the respective roles and responsibilities of each organisation must be clearly understood and agreed before the activity begins.

Safeguarding concerns arising during joint or externally delivered activity must be reported and managed through the appropriate safeguarding arrangements. BFC and BFCitC will work collaboratively with relevant partners and agencies to ensure concerns are responded to appropriately and without delay.

The Safeguarding Team should be consulted where there are safeguarding considerations relating to new partnerships, significant third-party arrangements or activities involving adults at risk.

14. PROFESSIONAL BOUNDARIES, POSITION OF TRUST AND APPROPRIATE BEHAVIOUR

Everyone working or volunteering on behalf of BFC and BFCitC has a responsibility to maintain appropriate professional boundaries and behave in a way that promotes the safety, welfare and wellbeing of adults at risk.

Those who hold positions of responsibility may have power, authority or influence over adults at risk. This may arise through their role, professional relationship, access to information or the nature of the support or activity being provided.

All staff, players, volunteers and others working on behalf of BFC and BFCitC must recognise the potential impact of this power and ensure that relationships remain appropriate, professional and respectful at all times.

POSITION OF TRUST

A position of trust exists where an individual has responsibility for, authority over or significant influence in relation to another person.

Individuals in positions of trust must never misuse their role or position for personal, sexual, financial or other forms of advantage.

They must not:

- abuse or exploit their position of power or influence;
- use their role to intimidate, threaten, coerce or manipulate another person;
- seek or develop inappropriate relationships with adults at risk;
- use information obtained through their role for personal benefit or advantage;
- engage in behaviour that crosses professional boundaries; or
- place an adult at risk in a situation that could reasonably be considered unsafe, exploitative or inappropriate.

Professional boundaries must be maintained both in person and through telephone, messaging, social media and other online communication.

POOR PRACTICE AND CONCERNING BEHAVIOUR

Poor practice is behaviour that falls below the standards expected by BFC and BFCitC and may create unnecessary risk, compromise professional boundaries or negatively affect an individual's welfare or wellbeing.

Poor practice may not always constitute abuse. However, where poor practice is repeated, ignored or allowed to continue, it can create an environment in which abuse or harm becomes more likely.

Examples of poor or concerning practice may include:

- failing to report safeguarding concerns or inappropriate behaviour;
- ignoring or failing to follow safeguarding policies, procedures or codes of conduct;
- bullying, humiliation, intimidation or unfair treatment;
- inappropriate communication or contact, including through social media or messaging platforms;
- favouritism or unnecessarily negative treatment of an individual;
- inappropriate physical contact or behaviour;
- hazing, initiation activities or other practices that may cause harm, humiliation or distress;
- placing an adult at risk in an unnecessary or avoidable unsafe situation; or
- behaviour that does not meet the expected standards of professional conduct.

This list is not exhaustive.

All concerns regarding poor practice or inappropriate behaviour should be raised and addressed at the earliest opportunity. Depending on the nature and seriousness of the concern, this may involve safeguarding, line management, Human Resources or other appropriate processes.

Where poor practice gives rise to a safeguarding concern, it must be reported immediately through the appropriate safeguarding arrangements.

BFC and BFCitC are committed to creating a culture in which concerns about behaviour and practice can be raised without fear of victimisation or detriment.

15. EQUALITY, DIVERSITY AND INCLUSION

BFC and BFCitC are committed to creating an inclusive environment in which everyone is treated with dignity, respect and fairness.

We recognise that individuals may experience additional barriers to accessing support, recognising abuse or raising safeguarding concerns because of their personal circumstances, identity, communication needs or lived experiences.

All adults have the right to live and participate in an environment free from abuse, discrimination, harassment, bullying, victimisation and exploitation.

Safeguarding arrangements must recognise and respond appropriately to the diverse needs of individuals. This includes consideration of age, disability, sex, gender reassignment, sexual orientation, race, religion or belief, pregnancy and maternity, marriage and civil partnership, and other individual circumstances or characteristics.

BFC and BFCitC will take reasonable steps to ensure that safeguarding information, support and reporting arrangements are accessible and inclusive.

No person will be treated less favorably or disadvantaged because they have raised a safeguarding concern or supported another person to do so.

This policy should be read alongside the BFC and BFCitC Equality, Diversity and Inclusion Policy and other relevant organisational policies.

16. WELLBEING AND PERSON-CENTRED SAFEGUARDING

Adult safeguarding must be person-centred and outcome-focused.

BFC and BFCitC recognise that adults have the right to make choices about their own lives and should, wherever possible, be involved in decisions that affect them.

When responding to safeguarding concerns, we will seek to understand:

- what matters to the individual;
- their views and wishes;
- the outcomes they would like to achieve; and
- how they wish to be involved in decisions and safeguarding processes.

Safeguarding action should promote the individual's wellbeing, independence, dignity and right to make informed choices.

The well-being principle is embedded within the Care Act 2014 and includes consideration of:

- personal dignity and respect;
- physical and mental health and emotional wellbeing;
- protection from abuse and neglect;
- control over day-to-day life and care;
- participation in work, education, training and recreation;
- social and economic wellbeing;
- relationships, family and personal circumstances;
- suitability of living accommodation; and
- the individual's contribution to society.

Safeguarding responses should be proportionate to the level of risk and, wherever possible, represent the least intrusive approach appropriate to the circumstances.

BFC and BFCitC are committed to the principles of 'Making Safeguarding Personal', ensuring that adults are supported to have choice, control and involvement throughout the safeguarding process.

Where an adult's wishes cannot be followed, the reasons for this must be clearly explained, appropriately recorded and based on the relevant safeguarding, legal or risk considerations.

17. Monitoring, Review and Continuous Improvement

BFC and BFCitC will regularly monitor the effectiveness of their safeguarding arrangements and use learning to continuously improve practice. This will include reviewing safeguarding concerns, incidents, trends and themes, training compliance, risk assessments, feedback, audit findings and the effectiveness of safeguarding policies, procedures and controls.

Safeguarding performance and identified actions will be monitored through the Club's established safeguarding governance and assurance arrangements. Where improvements are identified, appropriate actions will be agreed, implemented and monitored to completion.

Where appropriate, the views and experiences of adults who use our services or participate in our activities will inform safeguarding practice and improvements.

This policy will be reviewed at least every two years, and sooner where there are significant changes to legislation, statutory guidance, football safeguarding requirements, organisational activity, or following a significant incident or learning. Reviews will consider relevant national and local safeguarding developments, audit findings, emerging risks and lessons learned.

Safeguarding learning will be shared appropriately with staff, players, volunteers and other relevant individuals and will inform training, policies, procedures, risk assessments and wider safeguarding practice.

18. Related Policies, Procedures and Guidance

This policy should be read alongside BFC and BFCitC's wider safeguarding framework and related policies, procedures and guidance. These documents provide further detail on specific safeguarding responsibilities and situations and should be followed where relevant.

Relevant documents include:

- Safeguarding Framework
- Children's Safeguarding Policy, Procedure and Guidance
- Managing Allegations Against Staff Procedure
- Safer Recruitment Policy
- DBS Policy
- Mental Health and Wellbeing policies and procedures
- Equality, Diversity and Inclusion Policy
- Anti-Bullying and Behaviour policies
- Complaints and Whistleblowing procedures
- Data Protection and Information Sharing policies
- Codes of Conduct and relevant standards of behaviour
- Relevant Premier League, Women's Super League, EFL and FA safeguarding requirements and guidance.

Where there is conflict between this policy and legislation, statutory guidance or applicable football regulatory requirements, the relevant legal or regulatory requirement will take precedence, and the policy will be reviewed and updated as necessary.

Staff, players, volunteers, contractors and others working on behalf of BFC or BFCitC are expected to understand and comply with the policies, procedures and standards relevant to their role.

19. Safeguarding Contacts

Gary Russell - Head of Safeguarding
07435 946 205
g.russell@burnleyfc.com

Sharon Swindells – BFCitC Safeguarding Manager
07809 902145
s.swindells@burnleyfc.com

Mel Howarth – Academy Safeguarding Manager
07551 428 377
melanie.howarth@burnleyfc.com

Christi Botts – Women's Football Safeguarding Officer
07501 927 980
c.botts@burnleyfc.com

20. Additional Contacts

Jess Addicote – Director of Premier League Safeguarding
jaddicote@premierleague.com

Kate Singleton – PLCF, Senior Safeguarding Manager
ksingleton@premierleague.com

Alex Richards – Head of EFL Safeguarding
a.richards@EFL.com

Tara Lawson – Head of EFLitC Safeguarding
tlawson@efl.com

The FA Safeguarding Team
Safeguarding@TheFA.com

Lancashire Adult Safeguarding Team - 0300 1230 6720/6722

Lancashire Adult Safeguarding Board - 01772 538357

Ann Craft Trust - 0115 951 5400

NSPCC - historical abuse support - 0808 800 5000

National Domestic Violence Helpline - 0808 2000 247

Men's Advice Line - 0808 801 0327

Lancashire Victim Services - 0300 323 0085

Carers UK - 0207 378 4999

Survivors UK - 0203 598 3898

Minds matter - 01282 657268

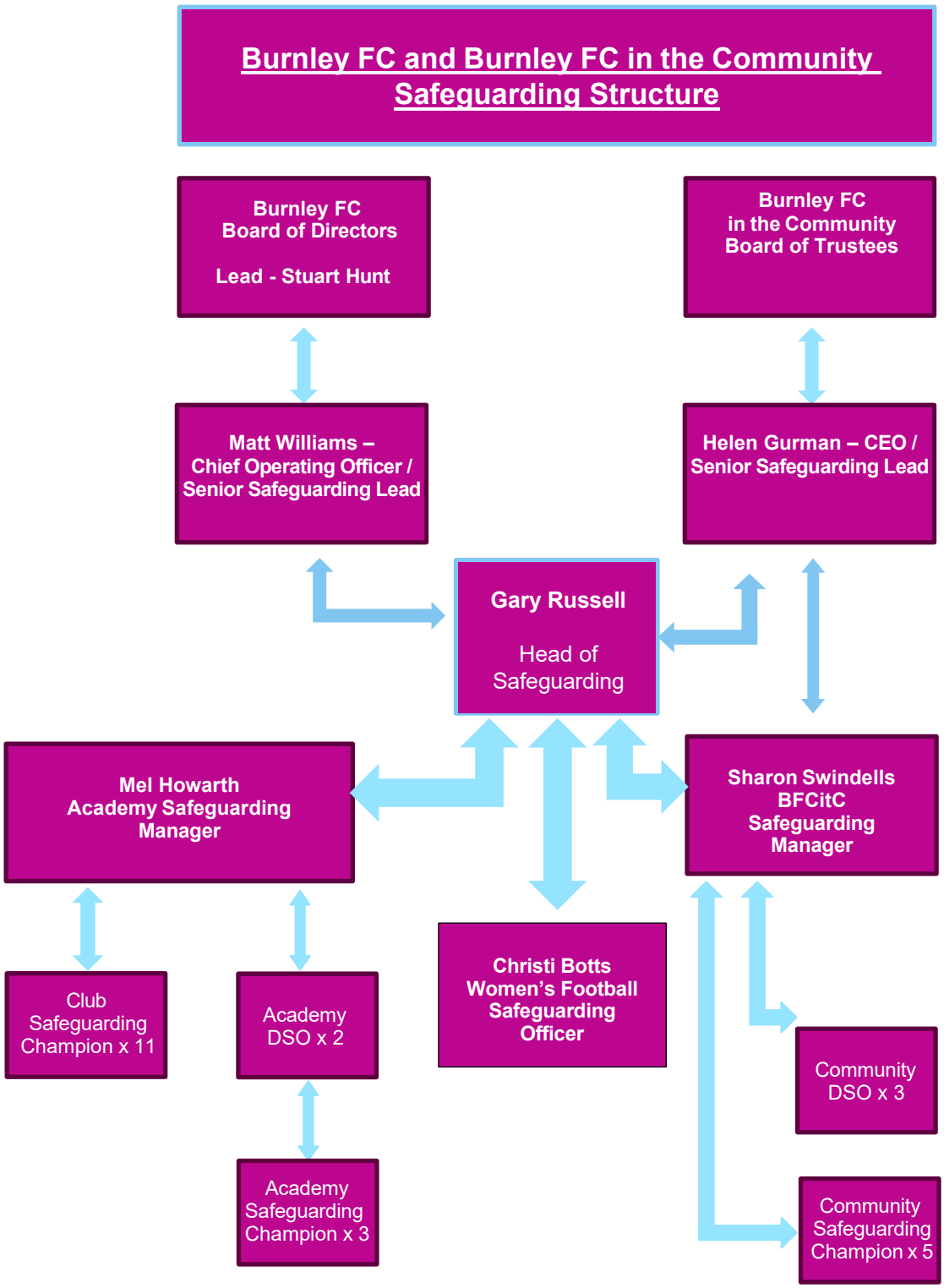
Samaritans - 0845 790 9090

Respect - 0808 8024640

Mental Health Crisis Team - 24-hour support - 01282 628455/657222

NHS Mental Wellbeing helpline - 0800 915 4640 or text 'hello' to 07860 022846

Care Quality Commission - 03000 61616



Should a concern be raised about the Head of Safeguarding you should contact either:

BFC Matt Williams - Chief Operating Officer m.williams@burnleyfc.com

BFCitC – Helen Gurman - Chief Executive Officer h.gurman@burnleyfc.com

Alexandra Richards, EFL Head of Safeguarding, arichards@efl.com

SAFEGUARDING ADULTS POLICY

BURNLEY

TURF MOOR, HARRY POTTS WAY, BURNLEY, BB10 4BX