



RIO FERDINAND FOUNDATION

Safeguarding Framework & Procedures

Adopted January 2024

Next Review Date: January 2025

Signed by Chair of Trustees, Bintou Crookes-Martin:

A handwritten signature in black ink, appearing to read 'Bintou Crookes-Martin', written over a horizontal line.

1st January 2024

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INTRODUCTION

Established as a registered charity in 2012, the Rio Ferdinand Foundation (“the **Foundation**” or **RFF**) works collaboratively with young people and communities to deliver progression pathways aimed at ensuring young people are socially mobile and empowered to be independent, take control of their lives and achieve their full potential.

Our work is delivered under four strategic pillars:

- Sport & Social Inclusion,
- Health & Wellbeing,
- Safer & Stronger Communities,
- Skills & Training

It takes place across very diverse communities of London, Manchester, The Republic of Ireland and Northern Ireland.

We are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age or any personality trait.

The Safeguarding Policies in this Handbook are designed to ensure that we fulfil our obligations under applicable laws to participants, stakeholders and otherwise in order to protect the interests of those members of society who may be vulnerable to risks identified in applicable legislation.

The Safeguarding Policies and procedures set out in this document apply to all staff unless otherwise indicated. They therefore apply to managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff (collectively referred to as “staff” in this handbook). Nonadherence to the Safeguarding policy or any RFF policy or Code of Conduct could result in disciplinary action or be classified gross misconduct, resulting in contract termination.

STATEMENT OF INTENT - EMBEDDING A SAFEGUARDING CULTURE

The implications of the failure to implement a robust approach to Safeguarding have been extensively documented, involving direct harm and abuse to the most vulnerable members of society. Ownership and commitment to a Safeguarding culture across RFF, starts at the top with Foundation Trustees and its CEO.

Our aim is that this commitment cascades through to all staff, who know that abuse can and does happen and are prepared to respond if the need arises. Equally, we want our participants to feel that they will be listened to, supported, and know that action will be taken on their behalf. The arrangements below are intended to complement our policy framework by providing response, where implementation of planned actions can be tracked to ensure we are meeting expectations of Safeguarding good practice.

- **Policy Review:** The two Safeguarding policies in this document set out in detail the procedures for responding to with concerns of abuse, disclosure, and allegations. They also include arrangements for Safer Recruitment and are complemented by the Foundation's Equality, Diversity and Inclusion policy, its Anti-Bullying, Whistleblowing, and Privacy Policy alongside a Behaviour Policy for both staff and participants. These documents will be reviewed annually in close consultation with the Board of Trustees and wider staff team.
- **Induction, Onboarding and Training:** All full time, sessional staff and volunteer have received a check from the Disclosure and Barring Service, Garda, or Access NI. Staff will receive appropriate Safeguarding awareness training within 4 weeks of joining the Foundation that is updated and refreshed every year, plus training specifically on the organisation's own safeguarding policy and procedures. This is to ensure that staff not only have an overall awareness of what good Safeguarding means but understand how to take action within the Foundation.
- **Staff Engagement and Continuous Improvement:** RFF is made up of a talented staff team. We want to draw on the different perspectives they have to ensure we continue to promote and embed a safeguarding culture. We will achieve through formal arrangements such as bi-monthly meetings of regional leads and weekly management meetings. This will be complemented by fostering a culture which encourages challenge, open discussion and information sharing where staff can feel comfortable raising Safeguarding related issues as well as opportunities for improving our response. Regular supervision and monitoring of staff will be carried out to ensure they everyone is clear about their roles, responsibilities, and boundaries.
- **Communication:** A copy of our approach to Safeguarding is on the Foundation's website and we will seek to explore other opportunities to promote Safeguarding culture through wider RFF communications.

• **Record Keeping and Data Management:** The following records will be stored on the RFF secure 'Sharepoint' drive and will be made available as appropriate/on a 'need to know' basis to evidence compliance with Safeguarding good practice across the Foundation.

- List of current DBS checks with dates for renewal
- Individual DBS/Access NI Certification
- Staff training records showing completion of Safeguarding induction and subsequent Safeguarding related training
- Reports of Safeguarding concerns
- Gifts/Hospitality Register

Summary of Management Arrangements

Who	Level of Responsibility
Foundation Trustees	<p>Ownership/accountability for Safeguarding</p> <p>Ensure robust policy in place and review of implementation</p> <p>Ensure high quality reports on Safeguarding matters and all reports</p> <p>Investigation of Safeguarding concerns/poor practice by CEO/SMT</p>
Foundation CEO	<p>Responsibility for Safeguarding with RFF staff team</p> <p>Ensure that the objectives of Safeguarding Policies are fully understood by Trustees and Senior Management Team members</p> <p>Ensure adequate resources are assigned (funds, materials, equipment, staff, training, and time) to meet requirements</p> <p>Ensure Policy is reviewed and updated annually and effectively communicated to all employees</p> <p>Provide appropriate updates on Safeguarding related matters and reports to the Board.</p>
Senior Management Team	<p>Oversee implementation of policy arrangements on behalf of CEO</p> <p>Nominate Designated Safeguarding Lead and Officers</p> <p>Ensure that objectives of Safeguarding Policies are embedded within the RFF team.</p> <p>Ensure all compliance processes and procedure relating to Safeguarding are being followed e.g. Induction, DBS, staff training, reporting etc</p> <p>Escalation of serious Safeguarding concerns to relevant Local Authority Safeguarding panels</p> <p>Investigation of concerns Safeguarding poor practice within the RFF team</p>
Designated Safeguarding Lead/Officers	<p>First point/s of contact for Safeguarding concerns</p> <p>Responsibility for timely response and reporting to Safeguarding concerns</p> <p>Provide advice to all employees on Safeguarding related matters</p> <p>Keep the CEO, SMT and Trustees updated on Safeguarding matters</p> <p>Lead on Safeguarding Training and identifying opportunities for continuous improvement</p> <p>Advise on changes and developments in Safeguarding best practice</p> <p>Support record keeping of all Safeguarding concerns and related matters</p> <p>Advise on Safeguarding policy development</p>

RFF Staff Team	<p>Completion of Safeguarding related training</p> <p>Contribution to Safeguarding policy development/continuous improvement</p> <p>Approach Designated Safeguarding lead asap with any concern no matter how minor it appears</p> <p>Act as positive role models standards in line with the Foundations vision and values</p>
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RFF Annual Safeguarding Forward Plan 2024/25

RFF Board Cycle	Safeguarding issues for consideration
Quarter 4 (2024/25)	<p>Adoption of 2024 RFF Safeguarding Framework</p> <p>Sign off of RFF Training schedule for 2024</p> <p>Identification/presentation of renewal dates for all staff DBS renewals</p> <p>Quarterly Safeguarding update/Quarterly review of Safeguarding Reports</p>
Quarter 1 (2024/2025)	<p>Completion of all outstanding DBS Renewals</p> <p>Completion of all DBS renewals carried out</p> <p>Formal survey/disclosure of staff of relevant welfare issues, incidents not captured on current DBS that have Safeguarding or wider reputational implications for RFF.</p> <p>Quarterly Safeguarding update/Quarterly review of Safeguarding Reports</p>
Quarter 2 (2024/2025)	<p>Quarterly Safeguarding update/Quarterly review of Safeguarding Reports</p>
Quarter 3 (2024/2025)	<p>Preparation/consultation of 2025 Safeguarding Framework</p> <p>Quarterly Safeguarding update/Quarterly review of Safeguarding Reports</p>
Quarter 4 (2024/2025)	<p>Q4 Adoption of 2025 RFF Safeguarding Framework</p>

SAFEGUARDING OF CHILDREN AND YOUNG PERSONS POLICY

Introduction

Rio Ferdinand Foundation (“**the Foundation**”) acknowledges and accepts it has a responsibility for the wellbeing and safety of all children and young people who are under the Foundation's care or utilising the Foundation's facilities. It is the duty of all adults working at the Foundation to safeguard the welfare of children and young people by creating an environment that protects them from harm.

The wellbeing of children and young people is paramount for all staff and accordingly, they must make themselves aware of the Foundation's Safeguarding Children and Young Persons Policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance. Through the application of policy, procedures and best practice, the Foundation promotes the safety, welfare and well-being of all children and young people enabling them to participate in any Foundation activity in an enjoyable, safe, inclusive, and child-centred environment.

Principles for Safeguarding equally applies to the safety and security of those working with and who are responsible for the activities involving children and young people and this policy is to be read alongside policies to ensure the wellbeing of the RFF staff team. Relevant policies include the Foundation's Health and Safety framework, particularly those involving mental health, management of stress and lone working.

Policy and Guidance

The Foundation is subject to the Policy and guidance set out, as follows:

Location	Policy and Guidance
United Kingdom	1989 and 2004 Children's Act Working Together 2023 Domestic Abuse Act 2021
Republic of Ireland	Children First Act 2015
Northern Ireland	Code of Ethics and Good Practice for Children's Sport, Sport Northern Ireland 2007. The Children (Northern Ireland) Order 1995. Our Duty to Care NI, DHSSPS 2012. Getting It Right, DHSSPS 2012. Co-operating to Safeguard Children DHSSPS 2003. Area Child Protection Committee – Regional Child Protection Policy 2005. Safeguarding Vulnerable Groups (NI) Order 2007. Protection of Freedoms Act 2012

The Foundation is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Foundation and its activities.

The Foundation has a responsibility to maintain regular dialogue with the Local Safeguarding Children Boards.

Definitions

“Child” (collectively referred to as **“Children”**): anyone under the age of 14.

“Young Person” (collectively referred to as **“Young People”**): anyone between the ages of 14 and 18.

Safeguarding and promoting the welfare of children” is defined in Working Together 2023 as:

- Providing help and support to meet the needs of children/young person as soon as problems emerge,
- Protecting children from maltreatment, whether that is within or outside the home, including online,
- Preventing impairment of children's mental and physical health or development,
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children/young person,
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Aims & Key Principles

The aims of the Foundation's Safeguarding Children Policy are:

- To safeguard all children and young people who interact with the Foundation.
- To demonstrate best practice in safeguarding children.
- To develop a positive and pro-active programme of engagement to enable all children and young people to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout the Foundation.

The key principles underpinning this policy are:

- The child's and young person's welfare must always be the paramount consideration.

- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs, or sexual identity.
- Safeguarding is everyone's responsibility: for services to be effective each professional and organization RFF work with should also play their part;
- All suspicions and allegations of abuse must be properly reported to the relevant internal and external authorities and dealt with swiftly and appropriately;
- To ensure that coaches, parents, and other adults who come in contact with children and young people provide good role models of behaviour.

Safeguarding Children and Young People within RFF

RFF Youth Engagement Programme

The Foundation has an ongoing commitment to delivering a programme of activities which covers all areas of the organisation. The programme will regularly be reviewed and updated according to any needs that may be identified.

Designated Safeguarding Lead and Designated Safeguarding Officers

The Foundation has a Designated Safeguarding Lead ("DSL") who is supported by three Designated Safeguarding Officers ("DSO") who have overall responsibility for the safeguarding of children and young persons engaged in Foundation activities/programmes. These Officers have special responsibilities and are the focal point for safeguarding children and young people in their nominated area.

Anybody with concern about a child or young person's welfare should contact a Designated Safeguarding Officer for advice in the first instance (details can be found at the end of this policy).

Human Resources & Disclosure

Recruitment

As part of the Foundation's recruitment and selection process, offers of work for positions which involve working with children and young persons are subject to a satisfactory Enhanced DBS / Access NI disclosure or a Garda Checks and appropriate references. See below and attached for details of the Foundation's Access NI and DBS procedures.

Staff Training

All staff, contractors and volunteers working in direct contact with children and young people shall be required to complete a workshop on Safeguarding Children and Young Persons within 4 weeks of joining the Foundation. Details of those satisfactorily completing this course are retained by the Foundation. Staff training will include regular 'refresher' training in the context of continuous improvement and development in Safeguarding best practice. [NB The nominated officer for delivering

Safeguarding Children and Young Persons training RFF is Melissa Fordham, [DSL and Head of National Programmes]. Donald Forde, [Director of Operations] will be responsible for delivery or will source alternative provision if she is unable to deliver within a 4-week window of a new member of staff joining the Foundation.]

Work Experience

The Foundation often offers work experience placements to young people. The Foundation has a central work experience scheme which provides forward planned and structured work experience placements. Whilst undertaking work for the Foundation, those on work experience will be given no unsupervised access to children and young persons. Potential Young People identified to take part in work experience will be subject to a risk assessment to establish their suitability to take part in work experience and that any necessary adjustments can be made before they join.

Health and Safety

Rio Ferdinand Foundation's Health and Safety Policy gives guidance to those whose roles involve working with children and young people. Where a child or young person is involved, a risk assessment must take account of their particular vulnerabilities. The risk assessment should set out what arrangements are in place for their care and supervision. Health and Safety considerations extend to the welfare of RFF staff, particularly in the context of mental health, management of stress and delivering community sessions within a safe environment.

Whistleblowing

Clear whistleblowing procedures are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting welfare to be addressed.

Clear policies inline with dealing with allegations against people who work/volunteer with children following the Local Authority Designated Officer (LADO) procedures. An allegation may relate to a person who works/volunteers with children/young person who has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Lone Working

In line with the Foundation's Health and Safety Framework, staff should not engage in any activity where they are in one-to-one contact with children or young people alone. The one exception to this requirement is around planned, one-to-one mentoring sessions between staff and participants which the Foundation recognises can be extremely important in supporting the personal development of young people. To accommodate these sessions, engagement is permitted but will only take

place in Foundation offices with other staff close by or in a public space such as a reception area or cafe but never in an enclosed private space such as a vehicle or residential address. Staff are obliged to make their Line Manager aware of planned one-to-one sessions and to keep a written record of discussions with the young person. This is to protect the member of staff as much as the Young Person. This is to protect the member of staff as much as the Young Person.

Disclosure and Barring Service/Access NI/Garda Vetting Checks

Rio Ferdinand Foundation uses the Disclosure and Barring Service (Formally the Criminal Records Bureau (CRB)) ("DBS") in England and Wales as well as the Access NI Service in Northern Ireland and a Garda vetting in the Republic of Ireland. The DBS/Access NI/Garda provides a disclosure service for organisations. This vetting and disclosures enable employers to undertake more thorough recruitment and selection procedures for positions which involve working with Children. These checks will be mandatory for all full-time, sessional staff and Trustees.

Process for Criminal Records checks

New Appointments

All staff who are offered a position which involves working, or coming into contact, with children and young persons will be required to complete a Self-Declaration Form and undertake a DBS Disclosure, Garda vetting or Access NI Disclosure in line with our Safer Recruitment Policy. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory Disclosure certificate has been received, the member of staff will not be left unsupervised with children and young persons.

Should a positive Disclosure be received, a risk assessment will be carried out by the Designated Safeguarding Lead or member of the Foundation's Senior Management Team in consultation with Trustees, to assess the information contained within the Disclosure certificate. The member of staff may also be asked to attend an interview prior to a recruitment decision being made. All DBS/Access NI certificates are stored securely on the Foundation's share point system with restricted HR access.

New Appointments who already have a Disclosure/Access NI/Garda Certificate

If a new member of staff has been DBS / Access NI checked / Garda Vetted by their previous employer, the Foundation may choose not to ask that person to undertake another check if the original Disclosure certificate is provided, is dated within six months of the worker's start date at the Foundation and for a similar role to that to which the person has been appointed.

Existing Staff

Priority is being given to those who come into regular contact with children. All staff who have one-to-one contact with children and young persons will be DBS/Access

NI/A Garda Checked. All staff will undergo a new DBS check after 3 years. Staff will be encouraged to disclose any events/issues which may have Safeguarding implications and/or which may otherwise impact on the Foundation's reputation during the lifespan of formal DBS checks. A more formal exercise will also be carried out annually to provide the opportunity for staff members to disclose such information.

Temporary Staff and External Consultants

All temporary staff and external consultants sign a self-declaration form and will not have unsupervised access to children and young people during their time with the Foundation or any associated event.

Equal Opportunities

Rio Ferdinand Foundation is committed to providing equal opportunities for all staff, participants, and supporters. A copy of the Foundation's policy on equal opportunities can be obtained from the Management Team.

Gifts & Favoritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment (see *Anti-Corruption and Bribery Policy* within the Staff Handbook for further details).

The Foundation recognises that there are occasions when children, young persons or parents wish to pass small tokens of appreciation to staff, for example at a religious holiday time or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. The receipt of all gifts will be recorded on a register of Gifts and Hospitality. Staff must report any gifts received and token gestures to their line manager. The appropriate documentation must be completed to satisfy HMRC, the Charity Commission and Companies House.

Similarly, it is not permitted for staff to give personal gifts to children and young people. This could be misinterpreted as a gesture either to bribe, or to single out the child or young person. It might also be perceived that a "favour" of some kind is expected in return. All employees will be required to register any such gifts on a formal gifts and hospitality register.

Any Foundation reward given to a child or young person must first be agreed with the staff member's line manager as part of a structured reward system and not based on favoritism.

Use of images

The Foundation applies the guidance on the use of images from guidelines issued by the Local Safeguarding Children Board:

- Parental consent for the taking of images of children and young people must be sought in writing at the start of the financial year or prior to the event or session. Parents/Carers/Guardians are responsible for informing the Foundation of any change of circumstances which may affect consent;

- Parents/Careers/Guardians will be informed of how the image will be used. The Foundation will not allow an image to be used for something other than that for which it was initially agreed;
- All children and young persons featured in Foundation publications will be appropriately dressed;
- Where possible, the image will focus on the activity taking place and not a specific child or young person;
- Where appropriate, images represent the broad range of people participating safely in the event;
- Designated Foundation photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children and Young Persons workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies from the Local Safeguarding Children Board;
- Foundation Identification and uniform will be worn at all times;
- Children and young people who are under a court order will not have their images published in any Foundation document;
- No images of children or young persons featured in Foundation publications will be accompanied by personal details such as their school or home address or other protected information;
- Recordings of children and young persons for the purposes of legitimate coaching aids are only filmed by Foundation officials and are stored safely and securely at the Foundation's premises;
- Any instances of inappropriate images must be reported to a Safeguarding Officer. The Foundation does not put young peoples' profiles with images and personal information on its website.

Guidelines in the event of concern

Highlighting a concern

Although the Foundation is committed to doing the utmost to safeguard children and young people from harm there may be occasions when concern is raised over the treatment of a child or young person. It is reasonably accepted that the Foundation may be the point of contact for someone who raises a concern over a child or young person in a programme that does not relate to a programme.

“Child abuse” and “neglect” are generic terms encompassing all ill treatment of children and young persons as well as cases where the standard of care does not adequately support the child's health or development. Children and young people may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child or young person and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse children and young persons, but this is simply not the case; abuse may take place in any setting, by someone of either sex, of any sexual orientation and of any age.

Types of Abuse

See Appendix D for recognizing possible child/young person abuse.

Responding to a report or suspicion*

If you are worried about a child/young person at risk, talk to the Designated Safeguarding Lead to discuss your concerns at the earliest opportunity, as long as it will not delay any potential referral or place someone at harm.

Where possible a Designated Safeguarding Officer should be contacted as early as possible; however, it is recognized that an individual may need to respond to a situation immediately.

Doing nothing is not an option; it is your responsibility to act in line with the policy.

See Appendix A: Safeguarding Code of Conduct for all RFF Staff, Contractors and Volunteers.

Make sure you tell a Foundation Designated Safeguarding Officer immediately; they will know how to follow this up and where to go for further advice.

Recording and Reporting allegations or suspicions

The Designated Safeguarding Officer will immediately report any suspicions or allegation to the Foundation's Designated Safeguarding Lead, who will ask for a written factual statement from the person making the report. If an Incident Report Form has been completed a copy should be provided to the DSL and will need to be signed by the member of staff completing a statement and countersigned by the DSL.

Any statement made by the child or young person should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgment should be clearly stated at this stage.

The Foundation will ensure that any child or young person concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the DSL will first seek the advice of the Safeguarding Children Team, Children's Social Care, a Local Authority Designated Officer ("LADO"), or the Police in England or the Social Services Gateway Team in Northern Ireland, before setting up an internal inquiry and following their advice on informing the Child's parents. In any case of suspected abuse, as soon as the Local Authority, Social Services Gateway Team or the Police have been informed, the Foundation must provide a report to the Foundation's Senior Management Team and Trustees protecting anonymity where required at law.

Providing it is appropriate to do so the DSL will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome.

Specific information regarding allegations against members of Staff

If the report involves an allegation about any member of the Foundation staff and the Foundation believes that the report may indicate that the member of staff in question has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children,

The Designated Safeguarding Lead, Members of the Foundation's Senior Management Team or Trustees shall immediately inform the relevant LADO or Social Services Gateway Team where the alleged incident took place so that he or she can consult with the Police and local authority children's social care colleagues or Social Services Gateway Team as appropriate. Where they are unsure as to whether the report meets the criteria stated above, the advice of the LADO / Social Services Gateway Team shall still be sought.

The member of staff and any other relevant person in question may be asked to write a brief report in respect of the allegation. This process will only be carried out after advice from the relevant external bodies and in consultation with the DSL, Foundation Senior Management Team, or Board of Trustees. Provided that it does not contradict advice received from the LADO/ Social Services Gateway Team, any internal investigation will be carried out in line with the Foundation's Disciplinary Policy and either general or Grievance Procedures, as applicable.

Information sharing relating to Safeguarding

Through the safe and effective sharing of information RFF aims to ensure that children/young people get the support they require from external services and that the people it works with are protected from harm, abuse or neglect. It also seeks to prevent from offending.

Confidentiality and information sharing must be integrated across all aspects of RFF services and management as its children/young people have the right to privacy and confidentiality and to understand when "secrets" cannot be protected for their best interests.

Confidentiality: Not all information is confidential. Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others.

RFF understands confidentiality to mean that no information regarding a child/young person shall be given directly or indirectly to any third party which is external to the Staff, without prior permission from the child/young person to disclose such information.

Breach of confidentiality: Confidence is only breached where the sharing of confidential information is not authorized by the child/person who provided it or to whom it relates. If the information was provided on the understanding it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be breach of confidence. Similarly, there will not be a breach of confidence where there is explicit consent to the sharing.

Even where sharing of confidential information is not authorized, RFF may lawfully share it if this can be justified in the public interest.

Seeking consent should be the first option, if appropriate. Where consent cannot be obtained to the sharing of information or it is refused, or where seeking it is likely to undermine the prevention, detection or prosecution of a crime, the question of whether there is a sufficient public interest must be judged on the facts of each case.

Therefore, where RFF have a concern about a child/young person, RFF will not regard refusal of consent as necessary precluding the sharing of confidential information.

Resources

SENIOR MANAGEMENT TEAM

Gary Stannett CEO

Rhiannon Watts – Consultant Director

Donald Forde – Consultant Director (07869 821096)

DESIGNATED SAFEGUARDING LEAD [DESIGNATED LIAISON PERSON - Republic of Ireland]

Melissa Fordham 07939 995515

DESIGNATED SAFEGUARDING OFFICERS [DEPUTY DESIGNATED LIAISON PERSON - Republic of Ireland]

Victoria Lowe – Greater Manchester and North West (07375 701950)

Shauna Belvett – London and the South East (07946 466519)

Darryl Forsythe– Northern Ireland and Ireland (07342 177763)

The Foundation's Senior Safeguarding contact is Chair of Trustees, Bintou Crookes-Martin (079582 39963)

Date and Review

This policy was adopted in January 2024 and applicable to January 2026. It is under constant review. Revisions will be considered on an ongoing basis.

Safeguarding Vulnerable Adults Policy

Introduction

Rio Ferdinand Foundation (“**Foundation**”) acknowledges and accepts it has a responsibility for the wellbeing and safety of all vulnerable adults who are under the Foundation’s care or utilising the Foundation’s facilities. It is the duty of all adults working at the Foundation to safeguard the welfare of Vulnerable Adults by creating an environment that protects them from harm.

The wellbeing of Vulnerable Adults is a paramount consideration and responsibility for all staff and accordingly, they must make themselves aware of the Foundation’s Safeguarding Vulnerable Adults Policy. Where appropriate, the guidelines followed will be supplemented by in-service training and additional guidance.

Policy and Guidance

The Foundation is subject to the Policy and guidance set out, as follows:

<u>Location</u>	<u>Policy and Guidance</u>
United Kingdom	The Care Act 2014 Domestic Abuse Act 2021
Republic of Ireland	National Vetting Bureau (Children & Vulnerable Person) Act 2012 Criminal Justice (Withholding of Information of Offences against Children & Vulnerable Person’s) Act 2012 The Assisted Decision Making (Capacity) Act 2015
Northern Ireland	The Protection of Freedoms Act 2015 Family Homes & Domestic Violence (NI) Order 1998 The Safeguarding Vulnerable Groups (NI) Order 2007 The Sexual Offences (NI) Order 2008 The Human Rights Act 1998 The Data Protection Act 2018 inc GDPR (replaced 1998 DPA) The Disability Discrimination Act 1995 Justice Act (NI) 2015 (Guidance – Adult Safeguarding Prevention and Protection in Partnership (July 2015)) (Guidance – Adult Operational Procedures (Sept 2016))

The Foundation is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Foundation and its activities.

Definitions

“Vulnerable Adult” (Adult at risk of abuse or neglect) Is someone over 18 years old who, according to paragraph 42.1 of the Care Act 2014:

- Has care and support needs,
- Is experiencing, or is at risk of, abuse or neglect,

- As a result of their care and support needs is unable to protect themselves against the abuse or neglect or the risk of it,
- If someone has care and support needs but is not currently receiving care or support from a health or care service they may still be an adult at risk.

Aims & Key Principles

The aims of the Foundation's Safeguarding Vulnerable Adults Policy are:

- To safeguard all vulnerable adults who interact with the Foundation; RFF recognises it has a duty of care and protection of adults who are at risk of abuse.
- To demonstrate best practice in safeguarding vulnerable adults.
- To develop a positive and pro-active welfare programme to enable all Vulnerable Adults to participate in an enjoyable and safe environment.
- To ensure staff are aware of this policy and are adequately trained.
- To promote high ethical standards throughout the Foundation.

The key principles underpinning this policy are:

- There can be no excuses for not taking reasonable action to protect adults at risk of abuse, exploitation, radicalization and mistreatment. All citizens of the United Kingdom have their rights enshrined within the Human Rights Act 1998. People who are eligible to receive health and community care services may be additionally vulnerable to the violation of these rights by reason of disability, impairment, age or illness.
- RFF is committed to following the six key Adult principles of safeguarding adults, Making Safeguarding personal and Capacity, Consent and decision making. (Appendix 1 for details)
- The welfare of the adult at risk is paramount.
- All adults at risk have the right to protection from abuse.
- Safeguarding is everyone's responsibility: for services to be effective each professional and organization RFF work with should also play their part;
- All suspicions and allegations of abuse must be properly reported to the relevant internal and external authorities and dealt with swiftly and appropriately;

Designated Safeguarding Lead and Designated Safeguarding Officers

The Foundation has a Designated Safeguarding Lead ("DSL") who is supported by three Designated Safeguarding Officers ("DSO") who have overall responsibility for the safeguarding of vulnerable adults engaged in Foundation activities/programmes. These Officers have special responsibilities and are the focal point for safeguarding vulnerable adults in their nominated area.

Anybody with a concern about an adult at risk should contact a Designated Safeguarding Officer for advice in the first instance (details can be found at the end of this policy).

Responding to a report or suspicion

The priority should always be to ensure the safety and protection of vulnerable adults. To this end it is the responsibility of all staff to act on any suspicion or evidence of abuse or neglect and to pass on their concerns to a responsible person or agency.

Doing nothing is not an option; it is your responsibility to act within the guidelines of the policy.

See Appendix A: Safeguarding Code of Conduct for all RFF Staff, Contractors and Volunteers.

Make sure you tell a Designated Safeguarding Officer immediately; they will know how to follow this up and where to go for further advice.

Types of Abuse

See Appendix E for Adult abuse types and indicators.

Information sharing relating to Safeguarding

Through the safe and effective sharing of information RFF aims to ensure that adult at risk gets the support they require from external services and that the people it works with are protected from harm, abuse or neglect. It also seeks to prevent from offending.

Confidentiality and information sharing must be integrated across all aspects of RFF services and management as its adults have the right to privacy and confidentiality and to understand when “secrets” cannot be protected for their best interests.

Confidentiality: Not all information is confidential. Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others.

RFF understands confidentiality to mean that no information regarding a adult shall be given directly or indirectly to any third party which is external to the Staff, without prior permission from the adult to disclose such information.

Breach of confidentiality: Confidence is only breached where the sharing of confidential information is not authorized by the adult who provided it or to whom it relates. If the information was provided on the understanding it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be breach of confidence. Similarly, there will not be a breach of confidence where there is explicit consent to the sharing.

Even where sharing of confidential information is not authorized, RFF may lawfully share it if this can be justified in the public interest.

Seeking consent should be the first option, if appropriate. Where consent cannot be obtained to the sharing of information or it is refused, or where seeking it is likely to undermine the prevention, detection or prosecution of a crime, the question of whether there is a sufficient public interest must be judged on the facts of each case.

Therefore, where RFF have a concern about a adult at risk, RFF will not regard refusal of consent as necessary precluding the sharing of confidential information.

Resources

SENIOR MANAGEMENT TEAM

Gary Stannett CEO

Rhiannon Watts – Consultant Director

Donald Forde – Consultant Director (07869821096)

DESIGNATED SAFEGUARDING LEAD [DESIGNATED LIAISON PERSON - Republic of Ireland]

Melissa Fordham 07939995515

DESIGNATED SAFEGUARDING OFFICERS [DEPUTY DESIGNATED LIAISON PERSON - Republic of Ireland]

Victoria Lowe – Greater Manchester and North West (07375701950)

Shauna Belvett – London and the South East (07946466519)

Darryl Forsythe– Northern Ireland and Ireland (07342177763)

The Foundation's Senior Safeguarding contact is Chair of Trustees, Bintou Crookes-Martin (07958239963)

Date and Review

This policy was adopted in January 2024 and applicable to January 2026. It is under constant review . Revisions will be considered on an ongoing basis.

Appendix 1:

Key six key principles that underpin safeguarding adults work

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

Making Safeguarding Personal

Making Safeguarding Personal is a shift in culture and practice in response to what we now know about what makes safeguarding more or less effective from the perspective of the person being safeguarded. It is about seeing people as experts in their own lives and working alongside them in a way that is consistent with their rights and capacity and that prevents abuse occurring wherever possible.

Safeguarding should be person-led and outcome focused, engaging the adult at risk 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, wellbeing and safety. In most cases this can only happen by making sure people get the care and support that they need. It is also important that the people who care for them also get this support and recognition. Most importantly it is about listening and providing the options that permit individuals to help themselves.

It may not always be possible to provide satisfactory solutions. At the age of 18, people are legally entitled to adult status regardless of any disability or impairment they may have. It is, therefore, essential that wherever possible it is the adult at risk who will decide on the chosen course of action, taking into account the impact of the adult at risk's mental capacity where relevant. However, the people and organisations caring for, or assisting them, must do everything they can to identify and prevent abuse happening wherever possible and evidence their efforts.

In these extremely difficult circumstances, staff will be expected to continue to exercise as much vigilance as possible.

Capacity, Consent and Decision Making

The consideration of capacity is crucial at all stages of Safeguarding Adults procedures. For example, determining the ability of an adult at risk to make lifestyle choices, such as choosing to remain in a situation where they risk abuse; determining whether a particular act or transaction is abusive or consensual; or determining how much an adult at risk can be involved in making decisions in a given situation.

The key development affecting this area of work is the implementation of the Mental Capacity Act 2005, which provides a statutory framework to empower and protect adults at risk who may not be able to make their own decisions. It makes it clear who can take decisions in which situations and how they should go about this. It enables people to plan ahead for a time when they may lose capacity. It applies to anyone

aged 16 years and over therefore appropriate liaison needs to occur for young people aged 16 to 18 years with Children's Services where relevant as part of Safeguarding Adults work.

The whole Act is underpinned by a set of five key principles:

- **A presumption of capacity** - every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise;
- **The right for individuals to be supported to make their own decisions** - people must be given all appropriate help before anyone concludes that they cannot make their own decisions;
- That individuals must retain the right to make what might be seen as eccentric or **unwise decisions**;
- **Best interests** - anything done for or on behalf of people without capacity must be in their best interests; and
- **Least restrictive intervention** - anything done for or on behalf of people without capacity should be the least restrictive of their basic rights and freedoms.

Rio Ferdinand Foundation
Safeguarding children and adults at risk of harm
procedures
April 2024

Safeguarding Procedures (All staff)

1. Purpose

Safeguarding is everyone's responsibility.

RFF operates to safeguard children and adults at risk of abuse or neglect.

We have an "absolute and unequivocal" duty of care to protect people from harm and have and are committed to the protection and safety of children and adults at risk, both on and off site.

All members of staff (paid and unpaid) are required to report any suspected abuse and be aware of the appropriate reporting and support procedure for safeguarding. Staff will exercise a 'professional curiosity' and will be alert to the fact that safeguarding issues can manifest themselves in any number of ways including, child-on-child abuse, child-on-adult abuse, service users can abuse service provider staff and remembering that anyone could become, or be, and adult at risk.

Staff will respond to all concerns, worries, suspicions, disclosures, allegations. If there is a safeguarding concern staff must not keep information about their concerns to themselves they must follow the procedure in the flowchart below for reporting safeguarding concerns.

The Safeguarding Lead and Officer(s) who support discharge their safeguarding functions in a way that ensures that adults at risk of harm are safeguarded from harm and promotes their welfare. The Safeguarding Lead is responsible for following up any suspected reports of abuse and for informing the police or other appropriate external bodies.

The Senior Management Team is responsible for supervision of these activities. *To be read in conjunction with the RFF Safeguarding Framework.*

2. Reporting of Safeguarding concerns

If you are worried about a child or adult at risk, talk to the RFF Safeguarding Lead to discuss your concerns at the earliest opportunity, as long as it will not delay any potential referral or place someone at harm.

2.1 Making a safeguarding referral

You must make a referral about an adult at risk if: -

- The adult considers they are being abused. Refer to Appendix E for definitions of Abuse and Indicators.
- The adult is caused distress or there is a deliberate attempt to cause the adult distress.
- Incidents are repetitive and targeted.
- A crime has been committed
- The incident involves a member of staff

We will call 999 and inform the emergency services in an emergency situation.

Where appropriate and safe to do so staff need to make it clear to anyone who shares information with them that will have to pass the information on and follow RFF procedure in order to ensure that no one else is at risk, to prevent a crime or to protect them if they cannot protect themselves from harm.

Lack of consent to share information does not mean that the staff member keeps the information to themselves, they must tell their Safeguarding Lead/ Deputy.

Flowchart for referral for actual or suspected abuse (2024)

See it. Recognise it. Report it.

If the matter is urgent because a child/young person or adult are at risk of harm or is in immediate danger

Phone 999 for the Police

See it

Are they safe? If you are concerned about a child/young person or Adult at Risk of harm you could help stop abuse

If you follow the safeguarding framework and procedure (use this flowchart)

It is not your responsibility to decide if abuse has happened. It IS your responsibility to report it to the Safeguarding Lead and/or appropriate authority



Recognise it

Share your concerns/ information with the Safeguarding Lead/ Deputy Safeguarding Lead.

If there is immediate danger to the child/young person or Adult at Risk call 999 for the Police.



Report it

If you have a concern about a child/young person or an Adult at Risk you need to make a safeguarding referral

Notes: reporting for Children/Young Person

Parents/ carers should be advised that you are making a referral unless this might put the child at risk or cause any delay in referring

Local Authority Designated Officer (LADO) Referrals

If you have concerns about an adult working with a child under the age of 18 that you would like to report

Notes: reporting for Adults at Risk

It is essential that wherever possible it is the adult at risk who will decide on the chosen course of action, taking into account the impact of the adult at risk's mental capacity where relevant.

However, the people and organisations caring for, or assisting them, must do everything they can to identify and prevent abuse happening wherever possible and evidence their efforts

Remember ALL notes will be disclosable should a formal or criminal investigation occur. Ensure that your notes are signed, dated, professional, separate opinion from fact, are recorded verbatim using the same words as were used during the disclosure.

2.2 Allegations of abuse or malpractice towards a child made against a member of staff including volunteers

It is essential that any allegation of abuse made against a person who works with children and young people including those who work in a voluntary capacity are dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

This procedure applies to a wider range of allegations than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. It also includes allegations that might indicate that the alleged perpetrator is unsuitable to continue to work with children in their present position, or in any capacity. This may be due to concerns about the persons conduct in their personal or professional life that might indicate their unsuitability to work with children.

It must be used in respect of all allegations that are consistent with the guidance in Working Together i.e. cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against, or related to, a child; or
- behaved in a way that indicates s/he is unsuitable to work with children.

If the allegation is against an RFF member of staff or volunteer the allegation must be reported immediately, at least within one working day, to the RFF Safeguarding Designated Lead.

If the allegation is against the Safeguarding Lead then the allegation must be reported to the Senior Management Team, who must then report the allegation to the Local Area Designated Officer (LADO) on the same day.

2.3 Note on safeguarding adults at risk

This document is to support decision-making to establish whether or not incidents/events need to be addressed using safeguarding practices.

There will be occasions where a concern raised does not need to go to safeguarding but could be resolved by; advice, information, assessment/review or the complaints process (this list is not exhaustive). Consider the most proportionate response to each situation prior to taking action, as per the Care Act.

The Care Act does not stipulate a 'process' as such as each piece of work must follow the ethos of 'Making Safeguarding Personal'. However, the decision as to whether we should support a person using safeguarding practice is guided within the Act. The adult at risk;

- a) has needs for care and support (whether or not the authority is meeting any of those needs),
- b) is experiencing, or is at risk of, abuse or neglect, and
- c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

2.4 Making Safeguarding Personal

Wherever possible the adult at risk should be consulted about the intention to report the concern (to whichever agency) or enabled to report the concern themselves. They should be informed that a concern is to be reported about risks to them unless it is not safe to do so.

- Public interest and the responsibility to protect all adults at risk may override the individual's rights and preferences.
- People have a right to be informed of, and involved in, Safeguarding Enquiries into risks of abuse or neglect that they may face.
- People have the right to, wherever possible, determine their own outcomes and how they might be achieved.
- We have a duty to, wherever possible, work to achieve those outcomes.
- People have rights in deciding how they live their lives and how to manage any risks that they face.
- Exceptions to these rights can be where people do not have the capacity to understand the risks involved, or where their involvement might put them or others at risk
- Adults at risk has a right to an advocate under these circumstances
-

Balancing individuals rights and agencies duties and responsibilities

Individuals have the right to take risks and to live their life as they choose.

These rights, including the right to privacy, will be weighed when considering duties and responsibilities towards them. They will not be overridden other than where it is clear that the consequence would be seriously detrimental to their, or another person's health and well-being and where it is lawful to do so.

Any concern, disclosure or witnessed abuse must be reported immediately in accordance with local multiagency policies and procedures.

3. Recognising child and adult abuse

Abuse can take many forms and the examples in the definitions in Appendix D and E are not exhaustive. There may be other situations not covered in the examples below that give you concern for a child's safety and wellbeing.

3.1 PREVENT: Vulnerable to radicalisation (VTR) or influenced by Extremism

Staff may notice a change in a child or adults' behaviour that may suggest they are vulnerable to violent extremism.

Below is guidance to assist in deciding whether a Prevent referral is appropriate and help to make referrals.

UNLIKE SAFEGUARDING STAFF MUST NOT DISCUSS CONCERNS WITH THE INDIVIDUAL PRIOR TO REFERRAL

GUIDANCE NOTES FOR RECOGNISING VTR

Who is Vulnerable to Radicalisation?

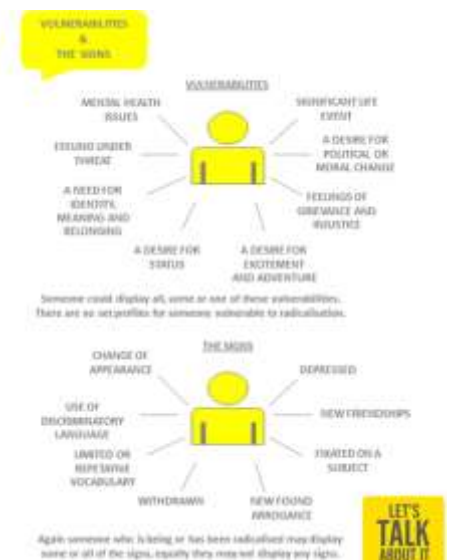
People who are vulnerable to radicalisation come from all walks of life, genders, ages and social groups, income levels, professions etc.

There is no profile for someone who could be drawn into terrorism.

Extremism is any form of extremism; this includes extreme right wing views, animal rights issues as well as religious views. It is unhelpful to have a narrow view of who can be VTR. It is important to keep an open mind. Looking at the factors associated with a person who becomes vulnerable to it can be helpful to look at.

This guide is to help you refer concerns about an individual who may be vulnerable to being drawn into terrorism. Below are questions which may help you to quantify and structure your concerns. The list is not exhaustive and other factors may be present but they are intended as a guide to help communicate your professional judgement about what has led you to make a referral.

Faith / ideology



- Are they new to a particular faith / faith strand?
- Do they seem to have naïve or narrow religious or political views?
- Have there been sudden changes in their observance, behaviour, interaction or attendance at their place of worship / organised meeting?
- Have there been specific examples or is there an undertone of “Them and Us “ language or violent rhetoric being used or behaviour occurring?
- Is there evidence of increasing association with a closed tight knit group of individuals / known recruiters / extremists / restricted events?
- Are there particular grievances either personal or global that appear to be unresolved / festering?
- Has there been an increase in unusual travel abroad without satisfactory explanation?

Personal / emotional / social issues

- Is there conflict with their families regarding religious beliefs / lifestyle choices?
- Is there evidence of cultural anxiety and / or isolation linked to insularity / lack of integration? Is there evidence of increasing isolation from family, friends or groups towards a smaller group of individuals or a known location?
- Is there history in petty criminality and / or unusual hedonistic behaviour (alcohol/drug use, casual sexual relationships, and addictive behaviours)?
- Have they got / had extremist propaganda materials (DVD's, CD's, leaflets etc.) in their possession?
- Do they associate with negative / criminal peers or known groups of concern?
- Are there concerns regarding their emotional stability and or mental health?
- Is there evidence of participation in survivalist / combat simulation activities, e.g. paint balling?

Risk / Protective Factors

- What are the specific factors which are contributing towards making the individual more vulnerable to radicalisation? E.g; mental health, language barriers, cultural anxiety, impressionability, criminality, specific grievance, transitional period in life etc.
- Is there any evidence of others targeting or exploiting these vulnerabilities or risks?
- What factors are already in place or could be developed to firm up support for the individual or help them increase their resilience to negative influences? E.g. positive family ties, employment, mentor / agency input etc.

3.2 Information sharing procedures relating to safeguarding

Through the safe and effective sharing of information it aims to ensure that adults at risk of abuse and or children get the support they require from external services and that the people it works with are protected from harm, abuse or neglect. It also seeks to prevent them from offending.

In many reviews into deaths of children and or adults at risk of abuse the lack of information sharing between agencies and organisations is often highlighted as a

contributory, if not causal, factor in the death. It is imperative that RFF staff understand the requirement to share safeguarding information in order to protect children and adults from harm.

Confidentiality and information sharing must be integrated across all aspects of RFF services and management as its users have the right to privacy and confidentiality and to understand when “secrets” cannot be protected for their best interests.

Information sharing Definitions

Confidentiality: Not all information is confidential. Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others.

RFF understands confidentiality to mean that no information regarding a service user shall be given directly or indirectly to any third party which is external to the Staff, without that service user’s prior expressed consent to disclose such information.

Breach of confidentiality: Confidence is only breached where the sharing of **confidential** information is not authorised by the person who provided it or to whom it relates. If the information was provided on the understanding that it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be a breach of confidence. Similarly, there will not be a breach of confidence where there is explicit consent to the sharing.

Even where sharing of confidential information is not authorised, RFF may lawfully share it if this can be justified in the public interest.

Seeking consent should be the first option, if appropriate. Where consent cannot be obtained to the sharing of the information or is refused, or where seeking it is likely to undermine the prevention, detection or prosecution of a crime, the question of whether there is a sufficient public interest must be judged by the Safeguarding Lead with the CEO on the facts of each case.

Therefore, where you have a concern about a child or young person, you should not regard refusal of consent as necessarily precluding the sharing of confidential information

Public interest: A public interest can arise in a wide range of circumstances, for example, to protect children or other people from harm, to promote the welfare of children or to prevent crime and disorder. There are also public interests, which in some circumstances may weigh against sharing, including the public interest in maintaining public confidence in the confidentiality of certain services. The key factor in deciding whether or not to share confidential information is proportionality, i.e. whether the proposed sharing is a proportionate response to the need to protect the public interest in question.

Serious crime: This means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to an adult.

The Information Sharing flowchart is in Appendix F

Appendix A: Safeguarding Code of Conduct for all RFF Staff, Contractors and Volunteers

This Safeguarding Code of Conduct sets out the expectations of RFF for all staff, contractors or volunteers who work for or represent the organisation in their contact with children, young people and adults at risk. Failure by any staff member to comply with this Safeguarding Code of Conduct may be considered Gross Misconduct and could end in summary dismissal. Contractors and volunteers may be asked to leave RFF premises and be dealt with according to the relevant procedures.

Do

- Approach any child, young person or adults at risk apparently in distress and ask if you can help and seek assistance from colleagues or supervisors in order to minimise the amount of time you are alone with the person.
- Be aware of the possible risks and question situations that you find suspicious.
- Communicate the details of any lost children to the Designated Officer
- Keep any lost children in a public area where they can be clearly seen and take them to the Designated area as quickly as possible.
- Actively contribute to an organisational culture where inappropriate behaviour is not tolerated.
- Ensure that whenever possible there is more than one adult present during activities with children, young people and adults at risk, or at least that you are within sight or hearing of others. The adult present may be a teacher or parent.
- If a child or adults at risk wishes to talk to you in confidence then try to find a quiet space in a public area where this is possible.
- Act professionally in all matters.
- Be aware of appearances and avoid any situations which might appear compromising.
- Report any allegation (even if this is just a suspicion) of abuse or inappropriate conduct immediately to your line manager and / or the Designated Officer.
- Always do your utmost to accommodate if the child / adults at risk expresses a wish to talk to a male or female member of staff.
- Be sensitive in your communication with people so that you avoid over familiarity

Do Not

- Engage in any "rough and tumble" or other horseplay.

- Make sexually suggestive comments to any visitor/service user.
- Use foul or abusive language to any visitor/service user.
- Allow or engage in inappropriate touching of any kind.
- Give out personal information, or share email, social network site details (eg, Facebook), and mobile phone numbers with any child, young person or adult at risk of abuse.
- Do things of a personal nature for children or adults at risk that they can do for themselves or that a parent / leader can do for them

Appendix B: How to react when a child/young person wants to talk about abuse

General points

- Take seriously what the child/young person says (however unlikely the story may sound)
- Keep calm
- Look at the child/young person directly
- Be honest
- Let them know you will need to tell someone else – don't promise confidentiality
- Reassure them they are not to blame for the abuse
- Be aware that the child/young person may have been threatened
- Never push for information
- Ask questions for clarification only; avoid asking questions that suggest a particular answer.

Helpful things to say or show

- Show acceptance of what the child/young person says
- "I am glad you have told me"
- "It's not your fault"
- "I will help you"

Avoid saying

- "Why didn't you tell anyone before?"
- "I can't believe it"
- "Are you sure this is true?"
- Never make false promises
- Never make statements such as "I am shocked!", or "don't tell anyone else"

Concluding

- Reassure the young person that they were right to tell you and that you take them seriously
- Let the young person know what you are going to do next and that you will let them know what might happen Immediately report the matter, as per procedures

Appendix C: Questions to ask yourself before making an adult safeguarding referral

Are the three safeguarding threshold criteria met?

- Do they have care and support needs?
- Are they experiencing, or are at risk of, abuse or neglect?
- as a result of their care and support needs they are unable to protect himself or herself against the abuse or neglect or the risk of it?

Remember that being safe is only one part of a person's life. Wellbeing, learning and quality of life are also important factors.

1. What is the concern?
2. What are the person's personal preferences and circumstances that create a proportionate tolerance of acceptable risk?
3. What would be a proportionate intervention to the potential risk?
4. What is/are the vulnerability/ vulnerabilities of the adult?
5. What is the nature and extent of the abuse?
6. How long has the abuse been occurring?
7. What is the impact of the abuse on the individual?
8. What is the risk of repeated or increasingly serious acts involving the adult or other adults?
9. What is the equality of the relationship between the adult and the alleged abuser?
10. Are there similar allegations against the alleged abuser?
11. Is the person safe?
12. Do you have consent to share, If not is there an overriding public interest or vital interest to share the information without consent? e.g. Is anyone else at risk? Could a crime have happened/be about to happen? There is a high risk to the health and safety of the adult at risk

You must make a referral if..

- The adult considers they are being abused
- The adult is caused distress or there is a deliberate attempt to cause the adult distress
- Incidents are repetitive and targeted
- A crime has been committed
- The incident involves a member of staff

Staff will follow the operational guidance on 'Making Safeguarding Personal'. This includes the following;

- Seeing people as experts in their own lives and working alongside them in a way that is consistent with their rights and capacity and that prevents abuse occurring wherever possible.
- Person-led and outcome focussed safeguarding, engaging the adult at risk 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, wellbeing and safety. Listening to the person and providing options that permit them to help themselves
- Recognising different preferences, histories, circumstances and lifestyles
- Wherever possible the adult at risk will decide on the chosen course of action, taking into account the impact of the adult at risk's mental capacity where relevant. However, staff caring or assisting them must do everything they can to identify and prevent abuse from happening wherever possible and evidence their efforts.

Remember you can discuss your concerns with the [mash professional's consultation line](#)

Appendix D: Recognising possible child/young person/adult abuse

The following behavioural signs may be indicators of child/young person/adult abuse, but care should be taken in interpreting them in isolation.

CHILD ABUSE

Physical signs

- Any injuries, bruises, bites, bumps, fracture, etc. which are not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls, rough games, etc.
- Injuries which appear to have been caused by a weapon e.g. cuts, welts, etc.
- Injuries which have not received medical attention.
- Instances where children/young people are kept away from the group inappropriately or without explanation.
- Self-mutilation or self-harming e.g.. cutting, slashing, drug abuse.

Emotional signs

Changes or regression in mood and behaviour, particularly where a child/young person withdraws or becomes clinging. Also depression/aggression.

- Nervousness or inappropriate fear of particular adults.
- Changes in behaviour e.g., under-achievement or lack of concentration, inappropriate relationships with peers and/or adults e.g., excessive dependence attention-seeking behaviour.
- Persistent tiredness, wetting or soiling of bed or clothes by an older child.

Signs of neglect

- Regular poor hygiene
- Persistent tiredness
- Inadequate clothing
- Excessive appetite
- Failure to thrive e.g. poor weight gain, consistently being left alone and unsupervised

Indicators of possible sexual abuse

- Any direct disclosure made by a child/young person concerning sexual abuse.
- Child/Young person with excessive preoccupation with sexual matters and detailed knowledge of.
- Adult sexual behaviour, or who regularly engages in age-inappropriate sexual play.

- Preoccupation with sexual activity through words, play or drawing.
- Child/Young person who is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.
- Other emotional signs (see above) may be indicative of sexual or some other form of abuse.

Domestic abuse

Be aware that a referral must be made direct to Children's Social Care, following the reporting flowchart below, if it seems reasonable to suspect that:

- a child sees, hears, experiences or is otherwise aware of domestic abuse – i.e. that domestic abuse is part of their experience of family life. This applies regardless of whether they actually witness any particular event or are physically harmed, and
- the non-abusing parent will not be able – for whatever reason – to ensure the safety and wellbeing of their child without significant professional assistance and support.

Appendix E Adult abuse types and indicators

The lists below are purely for Operational Guidance. The presence of one or more does not automatically confirm abuse. Abuse can generally be viewed in terms of the following categories; Physical, Domestic, Sexual, Psychological, Financial/ material, Modern Slavery, Discriminatory, Organisational, Neglect and acts of omission, and Self-neglect.

Physical Abuse

Physical injuries which have no satisfactory explanation or where there is a definite knowledge, or a reasonable suspicion that the injury was inflicted with intent, or through lack of care, by the person having custody, charge or care of that person, including hitting, slapping, pushing, misuse of or lack of medication, restraint, or inappropriate sanctions.

Possible Indicators of physical abuse

- History of unexplained falls or minor injuries
- Unexplained bruising – in well protected areas, on the soft parts of the body or clustered as from repeated striking
- Unexplained burns in an unusual location or of an unusual type
- Unexplained fractures to any part of the body that may be at various stages in the healing process
- Unexplained lacerations or abrasions
- Slap, kick, pinch or finger marks
- Injuries/bruises found at different stages of healing for which it is difficult to suggest an accidental cause
- Injury shape similar to an object
- Untreated medical problems
- Weight loss – due to malnutrition or dehydration; complaints of hunger
- Appearing to be over medicated

Domestic Abuse

Domestic abuse can also involve the abuse of an 'adult at risk'. Safeguarding Adults procedures only apply where the adult:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and

- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. (Sec 42 Care Act)

The Government definition of domestic abuse is: 'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over (Safeguarding Adults applies from age 18) who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional
- 'Honour' based violence
- Female Genital Mutilation
- forced marriage

'Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.' (Home Office 2013) Agencies that are concerned that an adult is subject to domestic abuse consider a referral to a multi-agency risk assessment conference (MARAC).

Action should always be taken to pass on referrals for all incidents of domestic abuse relating to adults at risk. Where the victim is not an adult at risk, concerns should be raised directly with the police.

The Government definition of domestic abuse, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group. Below is a brief outline of Honour Based Violence, FGM and Forced Marriage.

We will follow the Domestic abuse guidance and the Domestic Abuse Act 2021.

Honour Based Violence

Honour Based Violence (HBV) is a crime or incident which has or may have been committed to protect or defend the honour of the family or community. It is a collection of practices used to control behaviour within families or other social groups, to protect perceived cultural and religious beliefs and/or honour. Such violence can

occur when a relative has shamed the family and/or community by breaking their honour code.

Women are predominately but not exclusively the victims of so called Honour Based Violence which is used to assert male power in order to control female autonomy and sexuality. Honour Based Violence can be disguised from other forms of violence as it is often committed with some degree of approval and/or collusion from family and/or community members. Such crimes cut across all cultures, nationalities, faith groups and communities and should be referred within existing adult protection procedures where the victim is an 'adult at risk' as defined by the Care Act 2014.

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people lacking the mental capacity to make the relevant decisions, cannot) consent to the marriage and pressure or abuse is used. Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (removal of wages or deprivation of finances or necessities) can also be a factor.

Further support can be accessed via the Forced Marriage Unit (FMU). The FMU is a joint Foreign and Commonwealth Office and Home Office unit which was set up in January 2005 to lead on the Government's forced marriage policy, outreach and casework. It operates both inside the UK, where support is provided to any individual, and overseas, where consular assistance is provided to British nationals, including dual nationals.

The FMU operates a public helpline to provide advice and support to victims of forced marriage as well as to professionals dealing with cases. The assistance provided ranges from simple safety advice, through to aiding a victim to prevent their unwanted spouse moving to the UK ('reluctant sponsor' cases), and, in extreme circumstances, to rescue victims held against their will overseas. Tel: +44 (0) 20 7008 0151.

It is important to remember the following when addressing issues of Forced Marriage and/or Honour-based violence:

DO NOT go directly to, share information with, or use as an interpreter a relative, friend, neighbour, community leader or other with influence in the community. This will alert them to your enquiries and may place the adult at further risk.

DO NOT attempt to give the person immigration advice. It is a criminal offence for any unqualified person to give this advice.

Female Genital Mutilation (FGM)

Female genital mutilation/ FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. Girls under the age of 15 are mainly at risk but it is important for everyone working with adults at risk to be mindful of this practice.

Sexual Abuse

Sexual acts which might be abusive include non-contact abuse such as looking, pornographic photography, indecent exposure, harassment, unwanted teasing or innuendo, or contact such as touching breasts, genitals, or anus, masturbation, penetration or attempted penetration of vagina, anus, and mouth with or by penis, fingers or other objects (rape).

Possible Indicators of sexual abuse

- A change in usual behaviour for no apparent or obvious reason
- Sudden onset of confusion, wetting or soiling
- Withdrawal, choosing to spend the majority of time alone
- Overt sexual behaviour/language by the adult at risk
- Disturbed sleep pattern and poor concentration • Difficulty in walking or sitting
- Torn, stained, bloody underclothes
- Love bites
- Pain or itching, bruising or bleeding in the genital area
- Sexually transmitted urinary tract/vaginal infections
- Bruising to the thighs and upper arms
- Frequent infections
- Severe upset or agitation when being bathed/dressed/undressed/medically examined
- Pregnancy in a person not able to consent

Psychological Abuse

Psychological, or emotional abuse, includes the use of threats, fears or bribes to negate an adult at risk's choices, independent wishes and self-esteem; cause isolation or overdependence (as might be signalled by impairment of development or performance); or prevent an adult at risk from using services, which would provide help.

Possible Indicators of psychological abuse

- Ambivalence about carer
- Fearfulness expressed in the eyes; avoids looking at the carer, flinching on approach
- Deference
- Overtly affectionate behaviour to alleged source of risk
- Insomnia/sleep deprivation or need for excessive sleep
- Change in appetite
- Unusual weight gain/loss
- Tearfulness
- Unexplained paranoia
- Low self-esteem
- Excessive fears
- Confusion
- Agitation

Financial Abuse

This usually involves an individual's funds or resources being inappropriately used by a third person (i.e. theft) It includes the withholding of money or the inappropriate or unsanctioned use of a person's money or property or the entry of the adult at risk into financial contracts or transactions that they do not understand, to their disadvantage.

Possible Indicators of financial abuse

- Unexplained or sudden inability to pay bills
- Unexplained or sudden withdrawal of money from accounts
- Person lacks belongings or services, which they can clearly afford
- Lack of receptiveness to any necessary assistance requiring expenditure, when finances are not a problem – although the natural thriftiness of some people should be borne in mind
- Extraordinary interest by family members and other people in the adult at risk's assets
- Power of Attorney obtained when the adult at risk is not able to understand the purpose of the document they are signing
- Recent change of deeds or title of property

- Unpaid carer or support worker only asks questions of the worker about the user's financial affairs and does not appear to be concerned about the physical or emotional care of the person
- The person who manages the financial affairs is evasive or uncooperative
- A reluctance or refusal to take up care assessed as being needed
- A high level of expenditure without evidence of the person benefiting
- The purchase of items which the person does not require or use
- Personal items going missing from the home
- Unreasonable and /or inappropriate gifts

Modern Slavery

Modern slavery encompasses human trafficking, domestic servitude and forced labour. 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.

Possible indicators of modern slavery

- Marked isolation from the community
- Seeming under the control and influence of others and relying on others to communicate on their behalf
- Restricted freedom of movement
- Unusual travel times
- Unfamiliarity with the local neighbourhood
- Signs of physical or psychological abuse such as looking malnourished or unkempt or appearing withdrawn
- Poor living conditions such as unhygienic, overcrowded accommodation or living and working at the same address
- Few or no personal effects and no identification documents
- Reluctance to seek help often characterized by hesitance to speak to strangers or professionals and limited eye contact
- Fear of law enforcement

This list is not exhaustive. The signs of slavery are often hidden, making it difficult to recognise victims.

Where modern slavery is suspected and the victim is an adult at risk, a Safeguarding Adults referral should be made. All other victims should be referred to the police directly by dialling 101.

However, if you think a person is in immediate danger, call 999 and ask for the police.

Advice and Guidance can be sought from the Modern Slavery Helpline on 08000 121 700.

Discriminatory Abuse

This is abuse targeted at a perceived vulnerability or on the basis of prejudice including racism or sexism, or based on a person's impairment, origin, colour, disability, age, illness, sexual orientation or gender. It can take any of the other forms of abuse, oppressive treatment, harassment, slurs or similar treatment. Discriminatory abuse may be used to describe serious, repeated or pervasive discrimination, which leads to significant harm or exclusion from mainstream opportunities, provision of poor standards of health care, and/or which represents a failure to protect or provide redress through the criminal or civil justice system.

Possible Indicators of discriminatory abuse

- Hate mail
- Verbal or physical abuse in public places or residential settings
- Criminal damage to property
- Target of distraction burglary, bogus officials or unrequested building/household services
- Discriminatory abuse can manifest itself as the other types of abuse; physical or sexual abuse/ assault, financial abuse/ theft, neglect, psychological abuse.

Organisational Abuse

Organisational abuse happens when the routines in use force residents or service users to sacrifice their own needs, wishes or preferred lifestyle to the needs of the institution or service provider. Abuse may be a source of risk from an individual or by a group of staff embroiled in the accepted custom, subculture and practice of the institution or service.

Possible Indicators of Organisational Abuse

- Organisations may include residential and nursing homes, hospitals, day centres, sheltered housing schemes, group or supported housing projects. It should be noted that all organisations and services, whatever their setting, can have institutional practices which can cause harm to adults at risk.
- It may be reflected in an enforced schedule of activities, the limiting of personal freedom, the control of personal finances, a lack of adequate clothing, poor personal

hygiene, a lack of stimulating activities or a low-quality diet – in fact, anything which treats the person concerned as not being entitled to a 'normal' life.

The distinction between abuse in institutions and poor care standards is not easily made and judgements about whether an event or situation is abusive should be made with advice from appropriate professionals and regulatory bodies.

Disclosure and Barring Service (DBS)

The Safeguarding Vulnerable Groups Act 2006 (SVGA) places a legal duty on employers in the health and social care sector and personnel suppliers to refer any person to the Disclosure and Barring Service who has:

- Harmed or poses a risk of harm to a child or adult at risk of abuse;
- Satisfied the harm test; or
- Received a caution or conviction for a relevant offence.

Neglect / Acts of Omission

Neglect can be both physical and emotional. It is about the failure to keep an adult at risk clean, warm and promote optimum health, or to provide adequate nutrition, medication, being prevented from making choices. Neglect of a duty of care or the breakdown of a care package may also give rise to safeguarding issues i.e. where a carer refuses access or if a care provider is unable, unwilling or neglects to meet assessed needs. If the circumstances mean that the 'adult at risk' is at risk of significant harm, then Safeguarding Adults procedures should be invoked.

Possible Indicators of neglect

- Poor condition of accommodation
- Inadequate heating and/or lighting
- Physical condition of person poor, e.g. ulcers, pressure sores etc.
- Person's clothing in poor condition, e.g. unclean, wet, etc.
- Malnutrition
- Failure to give prescribed medication or appropriate medical care
- Failure to ensure appropriate privacy and dignity
- Inconsistent or reluctant contact with health and social agencies
- Refusal of access to callers/visitors

A person with capacity may choose to self-neglect, and whilst it may be a symptom of a form of abuse it is not abuse in itself within the definition of these procedures.

Willful Neglect and Ill-Treatment

Section 44 of the Mental Capacity Act 2005 and Section 127 of the Mental Health Act 1983 make it a criminal offence to ill-treat or wilfully neglect a person who lacks the capacity to care for themselves, or where the 'abuser' believes the individual lacks capacity.

The abuser is committing an offence when they are responsible for the care of the adult at risk and they willfully neglect or ill treat them. This includes paid carers, senior staff or managers in a hands-off role, family carers, any donee of a lasting power of attorney or court appointed deputy.

The terms 'ill-treatment' or 'wilful neglect' are not defined in either the Mental Health Act or Mental Capacity Act. In addition, the offences are separate.

Wilful neglect means deliberate failure to do something that was a duty, often with an element of recklessness. It does not require any proof of any particular harm or distress or proof of the risk harm. Ill-treatment involves deliberate conduct which ill-treats a person who lacks mental capacity to make the relevant decisions, whether or not it causes any harm to them. Ill-treatment also involves a guilty mind, with the alleged abuser having an appreciation that he or she was inexcusably or recklessly ill-treating the adult.

Most of the indicators of the other types of abuse may also indicate willful neglect or ill treatment if the adult at risk lacks the mental capacity to make the relevant decisions so these two offences should always be considered with each allegation of abuse in such circumstances.

Self-neglect

Self-neglect differs from the other forms of abuse listed here because it does not involve a perpetrator. Self-neglect is failing to care for one's personal hygiene, health or surroundings in such a way that causes, or is reasonably likely to cause significant physical, mental or emotional harm or substantial damage to or loss of assets. Self-neglect falls into the Safeguarding Adults remit when the adult meets the requirements of the three-stage test. Self-neglect can happen as a result of an individual's choice of lifestyle, or the person may have

- depression or other mental health condition,
- poor physical health,
- cognitive difficulties
- substance misuse

Possible indicators of self-neglect

- Living in grossly unsanitary conditions which endangers health and wellbeing

- Grossly inadequate self-grooming or personal care and/ or inappropriate or inadequate clothing.
- Maintaining an untreated illness, disease or injury or lacking eyeglasses, dentures, hearing aids, etc.
- Being malnourished or dehydrated to such an extent that, without intervention, the adult's physical or mental health is likely to be severely impaired
- Creating severely hazardous living conditions that will likely cause serious physical harm to the adult or others or cause substantial damage to or loss of assets, such as severe hoarding, improper wiring, lack of indoor plumbing or heating, infestation
- Managing ones assets in a manner that is likely to cause substantial damage to or loss of assets

The scope of this policy does not include issues of risk associated with deliberate self-harm. However, it may be appropriate to address the concerns by raising an Safeguarding Alert if:

- The self-harm appears to have occurred due to an act(s) of neglect or inaction by another individual or service
- There appears to be a failure by regulated professionals or organisations to act within their professional codes of conduct
- Actions or omissions by third parties to provide necessary care or support where they have a duty either as a care worker, volunteer or family member to provide such care/ support.

Self-Neglect & Hoarding

The Care Act Guidance states that self-neglect covers a wide range of behaviour; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Self-neglect involves the complex interplay of physical, mental, social, personal and environmental factors, all of which must be explored in order to understand the meaning of self-neglect in the context of each individual's life experience.

Hoarding is now considered a standalone mental disorder and is included in the 5th edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM) 2013, however, hoarding can also be a symptom of other mental disorders. Hoarding disorder is distinct from the act of collecting, it is not simply a lifestyle choice and is also different from people whose property is generally cluttered or messy.

Radicalisation

Radicalisation is not included as an abuse type in the Care Act Guidance. It is however important to include it to raise awareness and provide operational guidance

to staff. The Prevent Strategy (Home Office 2011) recognises that the presence of key vulnerabilities such as Learning Disabilities, autism or Mental Health problems can increase an individual's susceptibility towards radicalisation and to be influenced by extremism. Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk of radicalisation, using existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to identify individuals at risk of being drawn into terrorism.

The aim is to assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. Early intervention is required to protect and divert people away from the risk they face before illegality occurs. Any concerns that an adult at risk is being radicalised must be referred to the MASH. There are a number of behaviours and other indicators that may indicate the presence of vulnerability.

Example indicators that an individual may be engaged with an extremist group, cause or ideology include:

- Increasingly spending time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Their day-to-day behaviour increasingly centred around an extremist ideology, group or cause;
 - Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
 - Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
 - Attempts to recruit others to the group/cause/ideology; or
 - Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others;

- Plotting or conspiring with others. Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include:

- Having a history of violence;

- Being criminally versatile and using criminal networks to support extremist goals;

- Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction);

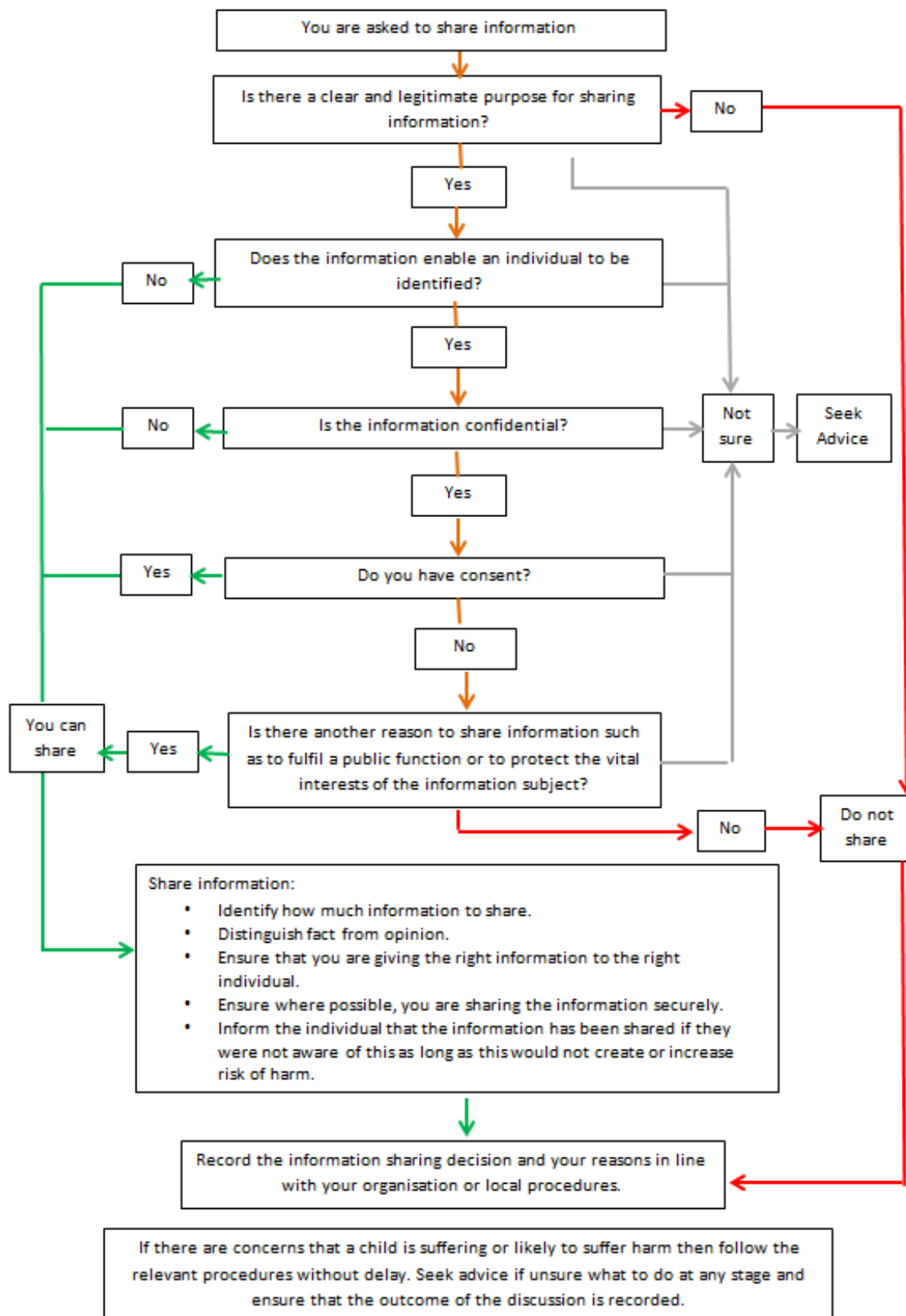
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

NB. The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved.

Crime and Anti-Social Behaviour

Antisocial behaviour is any aggressive, intimidating, or destructive activity that damages or destroys another person's quality of life; defined by the Crime and Disorder Act 1998 as 'acting in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as the defendant'.

Appendix F: Information sharing flowchart



Appendix G: Online Safety Policy Statement for children and young people (up to the age of 18 years old)

The purpose and scope of this policy statement

Rio Ferdinand Foundation works with children and families as part of its activities.

The purpose of this policy statement is:

- Ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices
- Provide staff and volunteers with the overarching principles that guide our approach to online safety
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

This policy statement applies to all staff, volunteers, children and young people and anyone involved in Rio Ferdinand Foundation's activities.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in the UK and Republic of Ireland.

We believe that:

- Children and young people should never experience abuse of any kind
- Children and young people should be able to use the internet for education and personal development, but safeguards need to be put in place to ensure they are kept safe at all times.

We recognise that:

- The online world provides everyone with many opportunities; however it can also present risks and challenges
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We have a responsibility to help keep children and young people safe online, whether or not they are using Rio Ferdinand Foundation's network or devices
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.

We will seek to keep children and young people safe by:

- Having an appointed Designated Safeguarding Lead
- Providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code

- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Developing an online safety agreement for use with young people and their parents or carers
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child or a young person
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the Foundation.

If online abuse occurs, we will respond by:

- Having clear and robust safeguarding procedures in place for responding to abuse; including online
- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our Foundation as a whole into account
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Safeguarding Framework and Procedures
- Procedures for responding to concerns about a child or young person's wellbeing
- Dealing with allegations of abuse made against a child or young person
- Managing allegations against staff and volunteers
- Code of conduct for staff and volunteers
- Anti-bullying policy and procedures

Contact details

Designated safeguarding lead

Name: Melissa Fordham

Phone: 07939 995515

Email: melissa@rioferdinandfoundation.com

NSPCC Helpline - 0808 800 5000

Appendix H: Anti-bullying Policy Statement for children and young people (up to the age of 18 years old)

The purpose and scope of this policy statement

Rio Ferdinand Foundation works with children and families as part of its activities.

The purpose of this policy statement is:

- To prevent bullying from happening between children and young people who are a part of our organisation or take part in our activities
- To make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- To provide information to all staff, volunteers, children and their families about what we should all do to prevent and deal with bullying.

This policy statement applies to anyone working on behalf of Rio Ferdinand Foundation, including senior managers and the board of trustees, paid staff, volunteers, and sessional workers.

What is bullying?

Bullying includes a range of abusive behaviour that is:

- Repeated
- Intended to hurt someone either physically or emotionally.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in the UK and Republic of Ireland.

We believe that:

- Children and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and operate in a way that protects them.

We recognise that:

- Bullying causes real distress and affects a person's health and development
- In some instances, bullying can cause significant harm
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- Everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to bullying.

We will seek to prevent bullying by:

- Developing a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities
- Holding regular discussions with staff, volunteers, children, young people and families who use our organisation about bullying and how to prevent it
- Providing support and training for all staff and volunteers on dealing with all forms of bullying, including racist, sexist, homophobic, transphobic and sexual bullying
- Putting clear and robust anti-bullying procedures in place.

Our regular discussions with staff, volunteers, children, young people and families will focus on:

- Group members responsibilities to look after one another and uphold the behaviour code
- Practising skills such as listening to each other
- Respecting the fact that we are all different
- Making sure that no one is without friends
- Dealing with problems in a positive way
- Checking that our anti-bullying measures are working well.

Responding to bullying

We make sure our response to incidents of bullying takes into account:

- The needs of the person being bullied
- The needs of the person displaying the bullying behaviour
- Needs of any bystanders
- Our organisation as a whole.

We will review the plan we have developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term.

Diversity and inclusion

We recognise that bullying is closely related to how we respect and recognise the value of diversity.

We will be proactive about:

- Seeking opportunities to learn about and celebrate difference
- Increasing diversity within our staff, volunteers, children and young people
- Welcoming new members to our organisation.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Safeguarding Framework and Procedures
- Code of conduct for staff and volunteers.

Contact details

Designated safeguarding lead

Name: Melissa Fordham

Phone: 07939 995515

Email: melissa@rioferdinandfoundation.com

NSPCC Helpline - 0808 800 5000

Appendix I: Behaviour code for children and young people (up to the age of 18 years old)

Why we have a behaviour code...

This code of behaviour is there to make sure everyone who takes part in Rio Ferdinand Foundation activities knows what is expected of them and feels safe, respected and valued.

Rio Ferdinand Foundation must make sure that everyone taking part in our activities has seen, understood and agreed to follow the code of behaviour, and that they understand what will happen if there is inappropriate behaviour.

We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

This code of behaviour aims to:

- Identify acceptable and unacceptable behaviour
- Encourage cooperation, honesty, fairness and respect
- Create an environment where your self-esteem, self-respect and self-confidence will grow
- Encourage you to recognise and respect the rights of others
- Encourage you to take responsibility for your own behaviour
- Help resolve conflicts and make it clear what will happen if you decide not to follow the code.

Dos and don'ts for children and young people

You should:

- Be supportive and kind to others
- Be friendly
- Listen to others
- Be helpful
- Have good manners
- Treat everyone with respect
- Take responsibility for your own behaviour
- Talk to a member of staff about anything that worries or concerns you
- Follow this code of behaviour and other rules (including the law)
- Join in and have fun!

You shouldn't:

- Be disrespectful to anyone else
- Bully other people (online or offline)
- Behave in a way that could be intimidating
- Be abusive towards anyone.

What happens if I do not follow the code of behaviour?

This code of behaviour is part of our process for making sure everyone who takes part in our activities gets the support they need.

1. Minor or first-time incident

If you behave in a way that doesn't follow our behaviour code, our staff or volunteers will remind you about it and ask you to change your behaviour.

This gives you the chance to think and to plan how you could behave differently, with support from staff and/or volunteers.

2. Formal warning

If you continue not to follow the code of behaviour after your first reminder, or if your behaviour is more serious, you will be given a formal warning by the person running your activity.

They will make a record about what happened and inform your parents or carers if it is appropriate. They will also talk with you about what happened and agree what support you need to improve your behaviour in the future.

We may also decide that further steps should be taken, such as restricting you from taking part in some activities.

3. Final warning

If the support we have put in place isn't helping you to change your behaviour, we might need to give you a final warning. Again, this will be recorded, and we'll inform your parents or carers as appropriate.

At this point, we might need to talk with you and your parents or carers about other services that might be more able to give you the support you need.

Child protection procedures

If any member of staff or volunteer becomes concerned that your behaviour suggests you might be in need of protection or that you might present a risk of harm to other children and young people, they will follow our safeguarding procedures. This might involve making a referral to the local authority.

If child protection procedures are necessary, we will talk this through with you and your parents as soon as possible, unless doing so would put you in danger or interfere with a police investigation.

The role of parents and carers

We see parents and carers as important in encouraging positive behaviour and will involve them as appropriate.

We will always inform and involve your parents or carers if you receive a formal warning about your behaviour, unless doing so would put you in danger.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Safeguarding Framework and Procedures
- Code of conduct for staff and volun

Appendix J: RFF reporting procedure for safeguarding concerns – child/young person/adult

All concerns should in the first instance be reported to your Designated Safeguarding Officer for the region which you work. Where a concern needs to be escalated, your Officer will ask you to submit a referral through the QR code.

The Designated Safeguarding Lead will then take the required action, keeping the Officer for the area updated during the process.



Declaration

DECLARATION: I have read and understood the Framework and Procedures herein and agree to work to the expected standards.

Name:.....

Signature:.....

Date:.....