

# SAFEGUARDING ADULTS AT RISK POLICY

2024-2025

This policy is available on-line at [www.efl.com](http://www.efl.com)

**WE WILL CONSIDER ANY REQUEST FOR THIS POLICY TO BE MADE AVAILABLE IN AN ALTERNATIVE FORMAT OR LANGUAGE. PLEASE CONTACT: EFL SAFEGUARDING MANAGER**

**WE REVIEW OUR POLICIES REGULARLY TO UPDATE THEM AND TO ENSURE THAT THEY ARE ACCESSIBLE AND FAIR TO ALL. WE WELCOME SUGGESTIONS FOR IMPROVING THE ACCESSIBILITY OR FAIRNESS OF THIS POLICY.**

**ALL OUR POLICIES ARE SUBJECT TO EQUALITY IMPACT ASSESSMENTS\*. WE ARE ALWAYS KEEN TO HEAR FROM ANYONE WHO WISHES TO CONTRIBUTE TO THESE IMPACT ASSESSMENTS.  
PLEASE CONTACT: EFL SAFEGUARDING MANAGER**

\*Equality Impact Assessments are carried out to see whether the policy has, or is likely to have, a negative impact on grounds of: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

APPROVED BY	VERSION	ISSUE DATE	REVIEW DATE	DOCUMENT OWNER
EFL BOARD	V6	01/05/2024	01/05/2025	Alex Richards, EFL Head of Safeguarding  arichards@efl.com

### COMMITMENT STATEMENT

The EFL is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in football in accordance with the Care Act 2014.

Safeguarding is everyone's responsibility. This policy represents the EFL's response to the need to protect adults at risk and outlines our key objectives for all staff and volunteers working within our organisation including our Member Clubs to:

- Enable everyone, regardless of age, culture, disability, gender, racial origin, religious belief and/or sexual identity to participate equitably in football in a safe environment
- Support member Clubs to implement their own adult at risk policies and procedures
- Work with Member Clubs to ensure all those working with Adults at Risk are competent and have been provided with relevant awareness training regarding the potential difficulties Adults at Risk can face and how to manage them
- Review our ways of working to incorporate good practice
- In conjunction with our Member Clubs take all suspicions and allegations of abuse or poor practice seriously and respond swiftly and appropriately to them in accordance with current legislation and football governing body procedures
- Ensure the safer recruitment of staff

### DEFINITIONS

For the purpose of this Policy the following definitions apply:

#### **Adults at risk of harm:**

A person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs) and

- is experiencing, or at risk of, abuse or neglect and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence. This list is not exhaustive.

An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

**Activity** means any activity or series of activities, arranged by or in the name of the EFL, for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

**Club** means an association football club in membership of the EFL.

**Staff** means any person employed or deployed by the EFL whether in a paid, voluntary, consultancy or third-party capacity.

**The Football Association ("The FA")** is English football's governing body.

Abuse is defined as a violation of an individual's human and civil rights by any other person or persons.

It includes acts of commission (such as an assault) and acts of omission (situations where the environment fails to prevent harm). Abuse may be single act or omission or series of acts or omissions.

Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be that the person has capacity to make a decision unless it can be established that they cannot.

### KEY PRINCIPLES

**Self Determination:** Safeguarding adults can be complex. Adults have a right to self-determination and may choose not to act to protect themselves. Safeguarding adults means creating a culture that informs the adult and consults them on all decisions affecting them and works in partnership with them.

As a principle safeguarding concerns should be discussed with the adult to establish their views and involve them in the safeguarding process. Occasionally however this may not be possible or safe. If in doubt seek advice from [safeguarding@efl.com](mailto:safeguarding@efl.com) or [ann-craft-trust@nottingham.ac.uk](mailto:ann-craft-trust@nottingham.ac.uk)

**The Care Act:** The six principles of the Care Act apply. The principles work together:

- **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 solution through services working with their communities
- **Accountability:** Accountability and transparency in delivering safeguarding

### TYPES OF ABUSE

**Self- neglect:** Not looking after own personal hygiene, health or surroundings or hoarding. This happens away from football, but we might see the signs in football.

**Domestic abuse:** Including psychological, physical, sexual, financial and emotional abuse. It also includes so called "honour" based violence. This happens away from football but we might see signs in football.

**Discriminatory abuse:** Difference or perceived difference, particularly with respect to race, gender or disability or any of the other protected characteristics of the Equality Act.

**Organisational abuse:** Including neglect and poor care practice within an institution, a specific care setting, their own home, or their football Club.

**Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/ or that may harm them or application of inappropriate restraint measures.

**Sexual abuse:** Adults with care and support needs can consent to sexual activity but can still be abused. This includes rape, Indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts or indecent exposure.

**Financial or material abuse:** Including theft, fraud, internet scamming or coercion in relation to an adult's financial affairs or arrangements.

**Neglect:** Ongoing failure to meet the basic needs of an Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

**Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

**Modern slavery:** slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**County lines:** The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

**Cuckooing:** Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

**Grooming:** The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

**Radicalisation:** The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children, Young People and Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

**Discriminatory abuse:** Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

**Poor practice:** This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially

compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

**Hazing:** Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

**Peer-on-peer abuse:** Children, Young People and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

### **SAFEGUARDING PROCEDURES FOR STAFF, VOLUNTEERS, THIRD PARTIES AND SUBCONTRACTORS EMPLOYED BY THE EFL**

#### **Maintaining professional boundaries**

Good safeguarding practices protects everyone. The EFL has produced a guide entitled "Safer Working Practice" a copy of which can be found on the Portal System (staff and Club intranet).

Whilst every attempt has been made to cover a wide range of activities in this guide it is recognised that it cannot cover all eventualities. Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the Adult at Risk in their care. All actions and behaviours should be guided by the principal that their safety and welfare of the Adult at Risk is paramount

#### **Responding to disclosures, safeguarding incidents and concerns**

Indications that an Adult at Risk may be being abused can be difficult to recognise. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent or carer, adolescence or accidental injury.

The presence of one or more signs and indicators should not be taken as proof that abuse has or is taking place, however Staff do not need evidence to report a concern. A person may be at increased risk of harm if you fail to report your concerns.

No single person can have a full picture of an Adult at Risk's circumstances. Staff should never think that their concerns are not significant enough to act on. Staff should discuss their concerns with the EFL's Safeguarding Team.

All disclosures, incidents and allegations must be taken seriously and responded to in line with the EFL Safeguarding Policy and training. This includes allegations about non-recent abuse and allegations made against deceased individuals.

Staff should contact the EFL Safeguarding Team without delay if they witness an incident or come upon information pertaining to the safety and welfare of an Adult at Risk.

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about an Adult at Risk's immediate safety, if they are having difficulty contacting a member of the EFL Safeguarding Team or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

The EFL will fully support anyone who in good faith reports their concerns about the safety and welfare of an Adult at Risk.

The EFL provides support to all those employed by the organisation whether in a paid or voluntary capacity in respect of their mental health through a number of initiatives including access to mental health first aiders.

It may be necessary for mental health first aiders to break confidentiality in certain circumstances for example:

- Where there is an immediate danger, when a person has clearly disclosed that they plan to take their life or has taken action which puts their life in danger
- The person is experiencing a crisis and emergency services, health professionals and/or mental health professional need to be contacted in order to access support
- The person is planning to take action which may put others at risk

If you have a concern for a colleague in respect of their mental health or whilst acting as a mental health first aider a disclosure occurs and you feel that the above conditions have been met then you should contact either the EFL Safeguarding Manager or Executive Office Director immediately.

### **What is a disclosure?**

A disclosure is the process by which a person starts to share that they have been abused with others.

This can happen in a variety of ways including:

**Directly:** Telling someone what has happened to them.

**Indirectly:** Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of disclosing abuse and we will ensure that appropriate action is taken to support and protect them.

### **Responding to a disclosure**

#### **Listen:**

- Staff should give their full attention to the person disclosing and should keep their body language open and encouraging.
- Staff should respect pauses and not interrupt the person disclosing.
- Staff should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification, Staff should use the language of the person disclosing to show that it is their experience.

#### **Reassure:**

- Staff should provide reassurance that the person disclosing is being taken seriously and that they are not to blame.

#### **Views and wishes:**

- Staff should engage the person disclosing as far as possible about how best to respond to their safeguarding situation.
- Staff are expected to act in the best interests of the Adult at Risk. Seek advice from the EFL Safeguarding Team without delay if in any doubt about what action to take, including sharing information.

### **Safety:**

- Staff should ensure that the immediate needs of the person disclosing are met and should prioritise their safety and protection above all else. This may involve contacting emergency services and/ or statutory agencies. The EFL Safeguarding Team must be immediately notified of all such action.

### **Take action:**

- Staff should explain to the person disclosing what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example if doing so would place the person at greater risk of harm.
- Staff should refer details of the disclosure to the EFL Safeguarding Team.
- Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic and other evidence must be preserved.

### **Record:**

- Good record keeping is essential safeguarding practice. It is vital that Staff make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made.
- Staff should contact the EFL Safeguarding Team if in doubt about recording requirements.

### **Staff must never:**

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person willingly discloses.
- Ask leading questions.
- Give the impression that the person disclosing is to blame.
- Approach the alleged perpetrator of abuse or person whose behaviour and/or actions there are concerns about.

The flowchart in Appendix 2 outline the steps to be taken by Staff when dealing with a disclosure, safeguarding incident or allegation.

### **Recording information:**

All incidents, allegations and disclosures must be recorded on an EFL Safeguarding Referral Form which can be found at Appendix 3. If Staff are unable to access our Safeguarding Referral Form, a written record should include the following information:

- Provide a factual account of what you have observed or have been told.
- The date and time of what you have witnessed or been told.
- Details of those involved: (i) person(s) whose safety and welfare there are concerns about, (ii) alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about, (iii) witnesses and (iv) any third party who has raised concerns.
- Action taken and your rationale for taking these actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer.



### Staff are expected to:

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner.
- Record factual information rather than assumption of what you have witnessed or been told.
- Record actual words and language. Don't rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruises, marks or injuries.

If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

### Confidentiality and storing of information

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. A number of Football Clubs and Football Authorities use electronic case management systems to store safeguarding records and concerns. The storage of this information and relevant security measures will be outlined in the Data Protection and GDPR policy of the relevant organisation.

GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purpose of keeping children, young people or adults at risk safe. More information and advice on information sharing for safeguarding practitioners can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

Those who need to know are those who have specific responsibilities to support and protect the Adult at Risk and others who may be at risk, for example, statutory agencies, the EFL Safeguarding Team, and The FA.

### Non Recent Abuse

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years old or over, relating to an incident which took place when the alleged victim was under 18 years old.

Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time, including fear of reprisals, the degree of control exercised by the abuser, and shame or fear that the allegation may not be believed.

Reports of non-recent concerns or allegations of abuse may be complex, as the alleged victims may no longer be living in the same situation where the abuse occurred and/or the whereabouts of the alleged respondent may be unknown.

However, such cases should be responded to in the same way as any other safeguarding concern or allegation. That is because:

- There is a likelihood that a person who abused a child/children in the past will have continued and may still be doing so;
- Criminal prosecutions can still take place, despite the fact that the allegations are non-recent in nature and may have taken place many years ago.

## Communication and media protocols

All media enquiries and communication with Clubs, CCOs and other stakeholders following a safeguarding incident or about our safeguarding provision generally must be approved by our Communication and Safeguarding Teams.

## Support for Staff

Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of those involved. It is important that anyone affected seeks help if they feel that they need support

## INFORMATION REGARDING EFL MEMBER CLUBS

The FA sets the safeguarding policy and regulatory framework across the game. A copy of the FA regulatory handbook can be found here:

<http://www.thefa.com/football-rules-governance/lawsandrules/fa-handbook>

The EFL produce annual safeguarding standards and regulations that govern Club's safeguarding arrangements and practices. A copy of the standards can be found here:

<https://www.efl.com/governance/safeguarding/>

The EFL regulations can be found here:

<https://www.efl.com/-more/governance/efl-rules--regulations/>

Clubs implement their own safeguarding policies and procedures that must be consistent with the football regulation, legislation, statutory guidance and current best practice. All Clubs receive an annual safeguarding quality assurance visit which assesses their compliance against these requirements.

## EFL Safeguarding team working alongside member Clubs

"Stronger Together" the EFL's three year safeguarding strategy outlines how we will work alongside and support our Clubs to drive continuous improvement in relation to the safeguarding of children and adults at risk within our care. A copy of the strategy can be found here:

<https://www.efl.com/governance/safeguarding/>

When in receipt of a referral from a Club the EFL safeguarding team will firstly provide support and guidance to the Club. Further action by the EFL may include:

Having oversight and working with Clubs to ensure that internal procedures and football regulations are followed.

- Agreeing a Club led internal investigation with the outcome shared with the Football Authorities.
- Conducting a joint investigation with The FA.
- Commissioning an independent case review (possibly in conjunction with The FA).
- Participation in multi-agency strategy meetings.
- Working with Clubs to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to manage communication
- Issuing of sanctions where EFL requirements have been breached
- Working with Clubs to ensure that learning outcomes are implemented to mitigate risk of recurrence
- Sharing anonymised learning from cases to strengthen safeguarding provision across the game

The EFL Safeguarding Team produce a number of guides to help and support Clubs in the area of safeguarding copies of which can be found on the Portal (League intranet facility). A list of the documents can be found below and available upon request from the EFL Safeguarding Team:

- Managing Safeguarding Concerns
- DBS Eligibility Guidance
- Guide to Safer Working Practice for EFL Member Clubs
- Six steps for Operating Trips, Tours and Tournaments
- Six steps for Developing a Club Transport Policy
- EFL guide to Prevent

### **Thresholds for referral to football authorities**

The thresholds below are set out in the Youth Development Rules and Affiliated Football's Safeguarding Policy:

- Any allegation of abuse of a child or adult at risk by a Participant or anyone who has previously been or is seeking to work or volunteer in football.
- Any referral to or from any external authority (including, without limitation; the Police, the Local Authority or the DBS) about abuse of or unsuitable behaviour towards a child or adult at risk by a Participant or anyone who has previously been or is seeking to work or volunteer in football.
- Three or more incidents or allegations of poor practice by the same Participant or anyone who has previously been or is seeking to work or volunteer in football.

It is important to note that football authority and/or internal employer disciplinary procedures may be delayed pending the outcome of statutory authority processes and/or criminal proceedings.

### **Identifying poor practice**

Incidents of poor practice occur when the needs of adults at risk are not afforded the necessary priority, so that their welfare is compromised. For example:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g. singling out and only focusing on the talented players and failing to involve the full squad)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines

The assessment about whether an incident is one of abuse or poor practice may not be able to be made at the point of referral, but only after the collation of relevant information

- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the EFL Safeguarding Team and/or FA

- All abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the EFL

### Thresholds for referrals to statutory authorities

Clubs may receive information regarding the welfare of an adult at risk who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g. the concern relates to the adult at risks home or a social setting other than football) the individual Clubs safeguarding policy and procedures should be implemented:

- Refer the concerns directly to local Adult Social Care or to the local Police. These agencies will advise the Club whether a formal referral is necessary and what further action the Club might need to be taken

### FURTHER SAFEGUARDING INFORMATION FOR ANY INDIVIDUAL INVOLVED IN FOOTBALL

Whilst we encourage concerns within our member Clubs to be raised with the employees with relevant safeguarding roles in the first instance we recognise that there are occasions when employees, stakeholders, and adults at risk may not feel comfortable in doing so. In these instances other relevant professional agencies can be contacted for advice, guidance and support:



**ALEX RICHARDS**  
**EFL SAFEGUARDING MANAGER**  
*T: 01772 325940*  
*E: arichards@efl.com*

**ANNE CRAFT TRUST**  
*T: 0115 951 5400*  
*E: ann-craft-trust@nottingham.ac.uk*



**THE FA SAFEGUARDING TEAM**  
*T: 0800 169 1863 and ask to speak to The FA Safeguarding Team*  
*E: safeguarding@thefa.com*

## POLICE

*In an emergency or if someone is in immediate danger, call the Police on 999 (101 for non-emergencies).*

The FA produce a number of safeguarding documents and guides for parents, young people and employees within the game which can be found here:

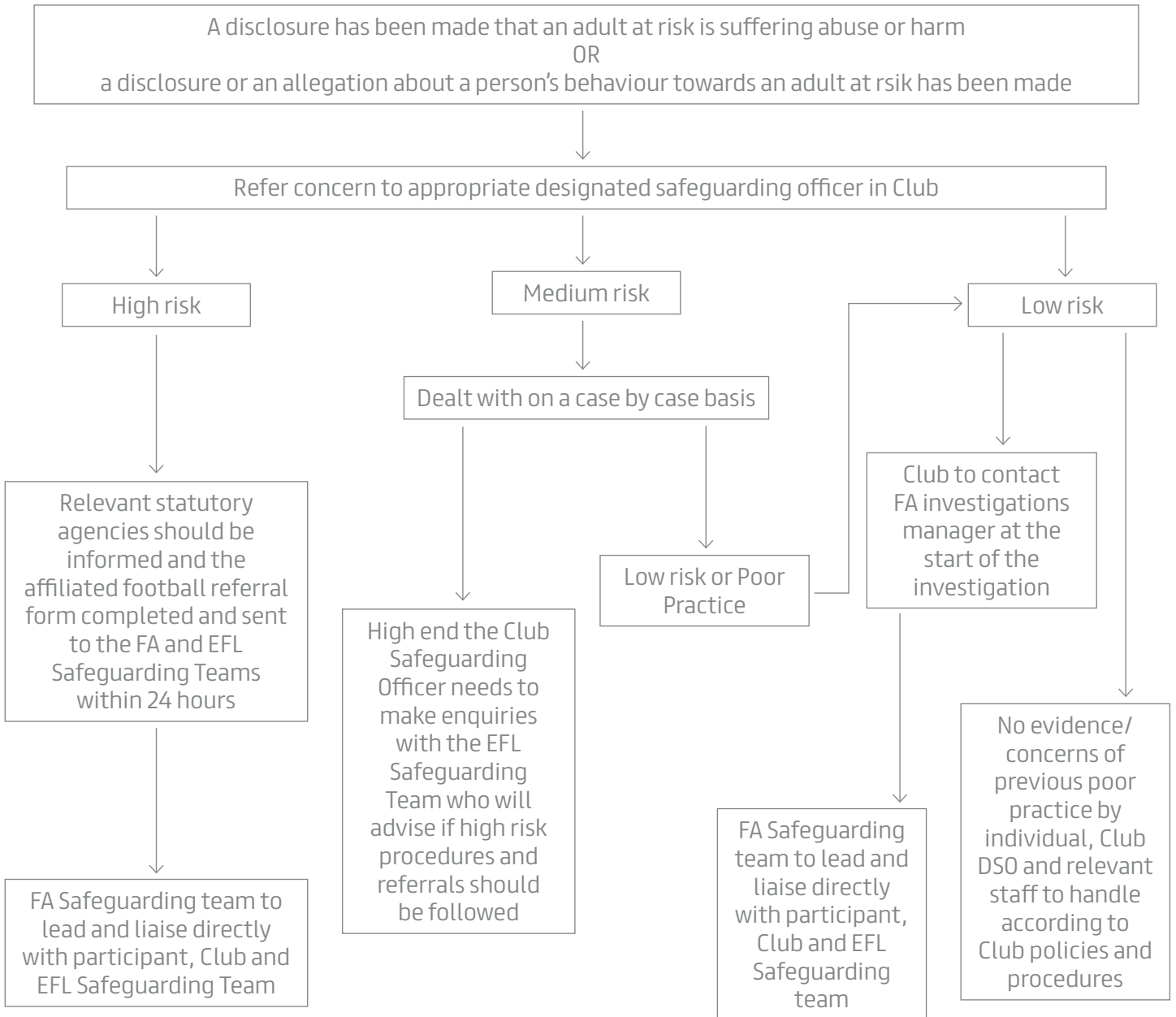
<http://www.thefa.com/football-rules-governance/safeguarding>

### SUPPORT FOR SURVIVORS WHO HAVE EXPERIENCE CHILD ABUSE IN FOOTBALL

In order to support those who have come forward and disclosed sexual abuse in a football context, affiliated football authorities have:

- **Set up a dedicated helpline number for survivors via the NSPCC:** This provides survivors with initial advice and guidance, as well as ensuring referrals are made to the police. From 23 November 2016 to 19 October 2017 the football helpline received more than 2,500 calls. 941 calls were from people concerned about abuse in football and approximately 65% of these resulted in referrals to external agencies. The remainder of the calls were enquiries and advice contacts.
- **Partnered with Sporting Chance:** This partnership is to provide nationwide opportunities for support to survivors of sexual abuse in football. Sporting Chance has increased the number of available phone lines, tailored the initial face-to-face therapist assessment process for survivors, developed a set of criteria to select therapists with expertise in the field, and educated them about the Crown Prosecution Service pre-trial therapy guidance. This is important to ensure that survivors receive support that will not hinder the progress of any criminal or civil justice processes.
- **Offered direct support to all known survivors via the police:** Only the police know the details of the survivors who have come forward to pursue a criminal justice route. With this in mind, a letter signed by all the football authorities was sent by Operation Hydrant to all 43 police forces to distribute to everyone who had come forward. This offered survivors who chose to, free specialist therapeutic support for a sustained period of time. This offer from the football authorities was shared with and supported by survivors with whom we had an active dialogue.

**APPENDIX 2- REFERRAL PROCESS FLOWCHARTS**



### **Duty to refer to DBS:**

Duty to refer to DBS is met when an employer has dismissed or removed a person from working with Children and Adults at Risk (or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position) because the person has:

- Been cautioned or convicted for a 'relevant offence.'

A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the Children's or adults' barred list.

- Engaged in 'relevant conduct.'

'Relevant conduct' is that which endangers or is likely to endanger Children and Adults at Risk.

- Satisfied the 'harm test.'

A person satisfies the harm test if they may harm a child or adult at risk or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or adult at risk.

Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

## APPENDIX 3- SAFEGUARDING REFERRAL FORM

### 1. PERSON(S) WHOSE SAFETY AND/OR WELFARE THERE ARE CONCERNS ABOUT

Please provide known details of the alleged victim(s)/person(s) whose safety and/or welfare there are concerns about

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Email address:	
Contact number	
Address:	

Please use a continuation sheet for details of additional persons

### 2. DETAILS OF THE PERSON(S) WHOSE ACTIONS OR BEHAVIOUR THERE ARE CONCERNS ABOUT

Please provide known details of the alleged perpetrator(s) of abuse/person(s) whose actions or behaviour there are concerns about

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	
Other known roles with children and/or adults at risk:	
FAN number:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Forename and surname	
Contact number:	
Address:	

Please use a continuation sheet for details of additional persons



### 3. DETAILS OF ANY WITNESSES

Please provide known details of any witnesses to the incident

Forename and surname	
Date of birth/estimated age:	
Relationship to the EFL:	

In the case of a child, please provide their parent's/legal guardian's contact details below

Email address:	
Contact number	
Address:	

Please use a continuation sheet for details of additional witnesses

### 4. DETAILS OF THE DISCLOSURE, INCIDENT OR CONCERN

Please provide the time, date and location of the disclosure, incident or concern using a continuation sheet if necessary

Date:	
Time:	
Location:	

Please provide:

- A factual account rather than assumption of what you have witnessed or been told
- Clear, concise and relevant information






## 6. DETAILS OF THE PERSON COMPLETING THIS FORM

Forename and surname	
Relationship to the EFL:	
Email address:	
Contact number	
Address:	
Date:	

If you are making this referral on behalf of someone else who has reported information to you, please provide their details

Forename and surname	
Relationship to the EFL:	
Email address:	
Contact number	
Address:	

## EFL SAFEGUARDING TEAM

**ALEX RICHARDS**  
**EFL HEAD OF SAFEGUARDING**  
*T: 01772 325940*  
*E: arichards@efl.com*

## EXTERNAL SAFEGUARDING CONTACTS



**THE FOOTBALL ASSOCIATION SAFEGUARDING TEAM**  
*T: 0800 169 1863 ask to speak to a member of the Safeguarding Team*  
*(during office hours Mon-Fri excluding bank holidays)*  
*E: safeguarding@thefa.com*

**POLICE** 101 ( or 999 in an emergency).

**ANNE CRAFT TRUST**  
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