Safeguarding Vulnerable Groups

Policy and Procedures

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**Safeguarding Vulnerable Groups Policy**

**Introduction**

Manchester United Foundation believes that it is always unacceptable for a child, young person or adult at risk (previously known as vulnerable adult) to experience abuse of any kind and recognises its responsibility to safeguard the welfare of these vulnerable groups, by a commitment to practice which protects them.
We recognise that:

- The welfare of children, young people and adults at risk is paramount.
- All children, regardless of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation (defined as Protected Characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse.
- Working in partnership with vulnerable groups, and their family or support network is essential in promoting and embedding this policy.

The purpose of the policy:

- To provide protection for the children, young people and adult at risk who receive services from Manchester United Foundation or its partners.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child, young person or adult at risk may be experiencing, or be at risk of, harm.
- Working in partnership with vulnerable groups, and their family or support network is essential in promoting and embedding this policy.

We will seek to safeguard vulnerable groups by:

- Valuing them by hearing, listening and respecting them.
- Adopting safeguarding guidelines and best practice through procedures and a code of conduct for staff and volunteers.
- Safely recruiting staff and volunteers through a safer recruitment process, ensuring all necessary vetting checks are made.
- Sharing information about safeguarding and best practice.
- Sharing information about concerns with the appropriate agencies (statutory agencies and affiliated football), in a confidential manner.
- Providing effective management for staff and volunteers through supervision, support, mentoring and training.

Definitions:

A child or younger person:

The UN Convention on the Rights of the Child defines a child as everyone under 18 years. The UK has ratified this convention in conjunction with the Children Act 2004.

An adult at risk:

Within the Care Act 2014, safeguarding duties apply to any adult aged 18 years and older 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

Where young adults (aged 18 or over) are still receiving children’s services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.
Roles and responsibilities

All staff and volunteers should ensure that they read the safeguarding policy and procedures, and understand the standards required of them and their responsibilities to ensure the safety and wellbeing of children, young people and adult at risks; and to take appropriate steps (including those set out in this policy and procedure) to ensure that suspicions and allegations of abuse are taken seriously and reported immediately and appropriately.

Tarun Kapur CBE, who is a member of the Board of Trustees, has been appointed by the Chairman of Manchester United Foundation to act on behalf of the board as the Safeguarding Lead. His role will be to support the Executive Management Team and the Safeguarding Team to deliver effective safeguarding provision across the Foundation but also to provide an important mechanism for critically evaluating the information presented to him, and, where necessary, challenging and checking it out.

Joanna Madyarchyk, as Head of Safeguarding for Manchester United, is responsible for the overall implementation of the safeguarding, case management and safer recruitment across both Manchester United and Manchester United Foundation. The Club Safeguarding Team and Foundation Safeguarding Officers are responsible for the day to day implementation of safeguarding and safer recruitment within the Foundation.

The Foundation is committed to reviewing and evaluating our policies, procedures and best practice guidelines on a regular basis.
Manchester United Foundation has an ongoing commitment to safeguarding that runs to the core of all projects we deliver in local communities across Greater Manchester. It is our responsibility as a Foundation to recognise signs of danger while having the correct procedures and policies in place that will allow us to continue protecting children, young people and adults at risk.

Through progressive training and regular consultation with staff who work in local communities we have made the safeguarding of our participants a number one priority.

Richard Arnold - Group Managing Director, Manchester United and Chair of the Board of Trustees, Manchester United Foundation

Children and young people are at the core of everything Manchester United Foundation does. Subsequently we are dedicated to recruiting and selecting compassionate staff and volunteers, that have the right skills, abilities and aptitude for the job. These individuals ensure that they are able to assist, nurture and develop the children and young people in their care on their journey from dependence to independence.

In addition, we have a high level of continual training and development in place for all staff and volunteers, adhering to a strict safeguarding code of conduct for engaging with vulnerable groups. Our workforce is energised to ensure that each participant enjoys a safe and secure environment at all times, helping them to realise their full potential.

John Shiels - Chief Executive Officer, Manchester United Foundation

Manchester United Foundation and I share a common goal; to improve the educational outcomes and aspirations of children in some of the most deprived and under-performing areas of the country. Throughout my 30 year career in education I have been privileged enough to work with thousands of children and from them I understand how vital it is to engage and inspire young people; the Foundation has a wonderful track-record of doing this. I am proud of the fact that through the power of football Manchester United Foundation has been able to make a significant difference to the lives of young people.

Although such positive outcomes are our united ambition, there is one fundamental precursor to everything we do – safeguarding. The culture of responsibility and accountability to every single child we work with is at the heart of Manchester United Foundation and this for me brings the greatest source of pride.

Taran Kapur CBE - Chief Executive & Academy Principal of The Dean Trust and Manchester United Foundation Trustee – safeguarding lead
Manchester United Foundation work in some of the most disadvantaged areas across Greater Manchester and uses the passion for Manchester United to engage, inspire and unite children, young people and vulnerable adults.

The Government Guidance ‘Working Together to Safeguard Children, 2015’ states that voluntary organisations and private sector providers play an important role in delivering services to children. The document emphasises that staff and volunteers need to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and make a referral to local authority children’s social care or the police if necessary. These principles are extended to all vulnerable groups for the purpose of this document.
The Foundations of Safeguarding – Creating a safer culture

The Foundation has developed and will continue to develop its framework in which the people, the policies and the learning and development programme will raise awareness of the responsibility that those engaging with Manchester United Foundation has in safeguarding vulnerable groups. To that end, the Foundation has clear and well publicised policies on:

- Safeguarding and protecting children and young people
- Reporting poor practice and abuse
- Recruitment of staff and volunteers
- Whistle-blowing
- Confidentiality
- Health and safety
- Anti-bullying
- Equality
- Codes of conduct (ethics)
- Complaints

In addition, there is a requirement for all those working or volunteering with vulnerable groups to complete appropriate levels of introductory and ongoing safeguarding training.

The Foundation will ensure that the processes and systems adopted focus on the wellbeing and safety of vulnerable groups; this includes but is not exhaustive to:

- Operational Guidelines - setting out expectations of the Foundation and any partner organisation, this can be in the form of Service Level Agreement or Partnership Check and Challenge tool.
- Activity guidelines – setting out the expectations for staff when working / volunteering in a project (this is important as each project will be unique and could differ from area to area; age to age).
- Risk Assessments – identifying and minimizing risk; setting supervision levels;

The Safeguarding Team will work collaboratively with the Foundation to ensure the implementation of the safeguarding framework in compliance with The Premier League Rules S – The Safeguarding of Vulnerable Groups and Safer Recruitment.
Position of Trust

Those who have responsibility for, and authority or influence over, vulnerable groups or are in relationships of trust in relation to the vulnerable groups in their care.

A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity. It is vital for all those in such positions of responsibility to understand the power they may have over those in their care, and the responsibility they must exercise as a consequence.

This means that those in relationships of trust should not:

- Use their position to gain access to information relating to vulnerable groups for their own or others’ advantage. Such information should only be used or shared to meet the needs of vulnerable groups.
- Use their power to intimidate, threaten, coerce or undermine vulnerable groups.
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be maintained at all times.
Poor Practice and Abuse
This takes place whenever staff or volunteers fail to fulfill the highest standards of care and support in their working practice. Poor practice which is allowed to continue can cause harm and can become abuse. Poor practice is unacceptable and will be treated seriously with appropriate action. Please see the Discipline Policy. An individual may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as 'acceptable'.

The Affiliated Football's Safeguarding Children Policy and Procedures define poor practice as follows:

- 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)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Allowing hazing practices to go unreported
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach of social media with a young player(s))
- Ignoring health and safety guidelines (e.g. allowing young players to set up goal posts unsupervised by adults)
- Failing to adhere to the club’s codes of practice (e.g. openly verbally abusing the referee)
- Giving continued and unnecessary preferential treatment to individuals

NB: (Please note – this list is not exhaustive)
Abuse Categories - Children and Young People

**Categories of Abuse**: Neglect | Physical | Sexual | Emotional (including Domestic Abuse)

**Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. It can cover different aspects of parenting. Indicators include;

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care.
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment.
- Child frequently absent from school.
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

**Physical Abuse** indicators can include an explanation which is inconsistent with an injury, several different explanations provided for an injury, unexplained delay in seeking treatment or reluctance to give information or mention previous injuries;

- Bruising - children can have accidental bruising, but the repeated or multiple bruising on the head or on sites unlikely to be injured accidentally; bruising around the face or variation in colour possibly indicating injuries caused at different times must be considered as non-accidental unless there is evidence or an adequate explanation provided.
- Fractures – the history provided is vague.
- Burns & Scalds
- Bite Marks
Abuse Categories - Children and Young People

Categories of Abuse:  Neglect | Physical | Sexual | Emotional (including Domestic Abuse)

**Sexual Abuse** is when adults, of either sex, or other children, use children to meet their own sexual needs. It involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve contact including penetrative acts or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural. Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing
Emotional Abuse may be difficult to recognise. It is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve making the child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-gated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Domestic Abuse

In addition, domestic abuse is an important indication of risk of harm to children, whom may suffer directly or indirectly if they live in households where there is domestic violence. Domestic abuse is likely to have a damaging effect on the health and development of children. Many of the signs and symptoms are indicators from the physical and emotional abuse definitions.
Abuse Categories - Adults at risks (1 of 2)

Categories of Abuse:  
Neglect and acts of omission | Physical | Sexual | Psychological (including Domestic Abuse) | Financial | Organisational | Discriminatory

Neglect and acts of omission include ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Neglect of this type may happen within a person's own home or in an institution/within an organisation/service. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional.

Physical abuse includes hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate physical sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. Additional symptoms include:

- Urinary tract infections or sexually transmitted disease.
- Signs of sexual activity having taken place e.g. a woman who lacks the capacity to consent to sexual intercourse becomes pregnant.
- Pain, soreness, itchiness.
- Person discloses fully or partially that sexual abuse is occurring or has occurred in the past.
- Person exhibits significant change in sexual behaviour or outlook.

Psychological abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Psychological abuse is the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation.

It includes preventing the adult from using services that would otherwise support them and enhance their lives. It also includes the intentional or unintentional withholding of information (e.g. information not being available in different formats/languages etc.)

Domestic abuse defined by The Home Office in March 2013 as: “Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality.”
Abuse Categories - Adults at risks (2 of 2)

Categories of Abuse: Neglect and acts of omission | Physical | Sexual | Psychological (including Domestic Abuse) | Financial | Organisational | Discriminatory

Financial Abuse includes theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. The Office of the Public Guardian identifies financial abuse as the most common form of abuse. Financial abuse can occur in isolation, but where there are other forms of abuse, there is likely to be financial abuse occurring.

Organisational Abuse (previously known as Institutional abuse) includes, neglect and poor care practise within an institution or specific care setting such as a hospital or care home or in relation to care provided in one’s own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Discriminatory Abuse includes forms of harassment, slurs or similar treatment because of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. It also includes racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person’s disability. Excluding a person from activities on the basis that they are ‘not liked’ is also discriminatory abuse.

Remember that: It is not the responsibility of staff or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns in accordance with this procedure.
Responding to Allegations of Abuse

It is not the responsibility of anyone within the Foundation, in a paid or unpaid capacity, to decide whether or not abuse has taken place. All staff and volunteers have a responsibility to ensure the safety and welfare of children and adult at risks, including taking appropriate steps (including those set out in this procedure) to ensure that suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately.

The Foundation will assure all staff and volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague or another is, or may be, abusing a child or adult at risk.
Guidance for dealing with a disclosure (1 of 2)

Through appropriate training, staff and volunteers will become more confident in dealing with concerns, allegations and disclosures. The role staff and volunteers is to:

### Recognising
Recognising abuse or harm is often not easy. You need to act when harm or abuse is suspected and not just when you are absolutely sure that harm has occurred. Suspects mean you do not have the proof of abuse. It does not mean you are jumping to conclusions, it simply means that there is a safeguarding concern that must be reported and the Safeguarding Team can find out more information.

### Responding
When harm or abuse is disclosed your role is to report the basic facts you know of to the Safeguarding Team or statutory services. The disclosure may be sudden with a lot of information provided, or a statement may be made which hints at an abusive situation. What to ask:
- Who...
- What...
- Where...
- Which...
- When...
- Tell me...
- Explain to me...
- Describe to me...

### Refer/Report
Your concern needs to be appropriately shared with either the Safeguarding Team or to Statutory Services, verbally and later in writing using the referral form.

### Record
Using the Club Referral form will ensure that you capture the necessary information. This must be completed on the day of the incident or within 24 hours. If the referral form is not used, the document provided must be legible, clearly dated and signed and include detailed description of the incident; what exactly happened, when and where, how and who was involved, names of witnesses, and exactly what was said. It is crucial that when writing up you stick to the facts, using the individual’s own words. Where possible always record the child or adult at risk’s wishes.
Guidance for dealing with a disclosure (2 of 2)

1. Children/Young Person (CYP) or adult at risk makes a disclosure
   - Staff recognise signs of abuse
   - Incident between participants during a session
   - Safeguarding concerns from within the local community

2. Keep calm and reassure the CYP or adult
   - Ask for further details - Do not ask leading questions: Tell Explain Describe
   - Explain you will have to pass information on

3. Allow the CYP/Adult to talk at their own pace and use their own language
   - Do not pressure them into telling you more than they want to
   - Listen attentively
   - Avoid going over the information time and time again; you are only gathering information to help you form a belief on reasonable grounds that you need to make a referral

4. Where the CYP or adult is at immediate risk of harm keep them at the session until advised by Children’s Services, Adults’ Services or Safeguarding Team

5. Contact Safeguarding Team & line manager
   - Refer to safeguarding contacts if Safeguarding Team unavailable

6. Make a detailed and factual record including; quotes, dates, times, contact details
   - Complete Safeguarding Incident Referral Form within 24 hours.
   - Email this to Safeguarding Team - safeguarding@manutd.co.uk and your line manager
Self-Referral

The Foundation acknowledges that on occasions when staff and volunteers who identify their own poor practice or practice which could be questioned as to their integrity, they have a duty to self-refer themselves to their manager or the Safeguarding Team. By doing so they support The Foundation’s objectives set out in this policy. In order for positive engagement with vulnerable groups, professional boundaries must always be maintained, to ensure these professional standards are upheld, it is important that staff and volunteers self-refer when vulnerable groups are forming an over familiar attachment with them, as discussed in The Premier League’s Guidance for Safer Working Practice.

Confidentiality and Information Sharing

Staff and volunteers should ensure that confidentiality protocols are followed and information is shared appropriately. All staff and volunteers must understand that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff and volunteers must be clear with children and adult at risks that they cannot promise to keep secrets.
Case Management of Safeguarding Concerns

In accordance with The Premier League Rules Section S: The Safeguarding of Vulnerable Groups and Safer Recruitment, the Head of Safeguarding will act as the lead Club Official in any investigation of an allegation of abuse or a Child or Adult at Risk, and in her absence will deputise this responsibility to a member of the Safeguarding Team.
Concerns about poor practice

- Any suspicions or concerns relating to poor practice must be reported immediately to the Safeguarding Officer or the Department Manager.
- Information gathering will be completed by the Safeguarding Officer, who will consult with the Department Manager.
- The Head of Safeguarding must be made aware of the outcome including the case management documentation being sent for referencing in Group HR.
- Discipline procedures may be initiated by Group HR, if required.
- The Affiliated Football’s Safeguarding Children Policy and Procedures state that professional clubs need to send a referral to The FA Safeguarding Team where repeated poor practice incidents occur. To avoid doubt a referral needs to be made where there are three incidents of poor practice by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice, so that there is some FA support for County FA’s and clubs, and oversight of the thresholds for poor practice cases being managed locally.

Concerns about alleged abuse

- Any suspicion or concern that a child or adult at risk has been abused or is at risk of abuse must be reported immediately to the Safeguarding Team. The Safeguarding Team will take necessary steps to ensure the safety of the child or adult at risk in question and any other individuals who may be at risk. Staff and volunteers must not carry out their own investigations.
- The Safeguarding Team will assess the information disclosed and take appropriate action. The Safeguarding Team will, together with other appropriate senior staff (where appropriate), assess whether the suspicions or concerns should be referred to the Local Authority and/or the police. Throughout the process clear records of decision making will be documented.
- The parents or carers of the alleged victim and/or perpetrator will be contacted as soon as possible and if applicable, following advice from statutory agencies.
- Internally the safeguarding escalation flow chart will be activated.
- Following guidance from statutory agencies The Football Association may be notified – as per the Premier League Rule section ‘S’ within 24 hours.

If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the Head of Human Resources or in his absence the Group Operations Director, who will duly notify statutory agencies.
Where there is a safeguarding complaint against a member of staff or volunteer, three types of investigation can be opened:

- A criminal investigation led by the Police.
- An investigation led in a multi-agency approach by the Local Authority.
- A disciplinary or misconduct investigation led by Manchester United Limited, which may also involve Affiliated Football. It is important to highlight that the results of the Police investigation may well influence the disciplinary investigation.

The Head of Human Resources will decide if the individual will be suspended on full pay in line with the disciplinary procedure. Following the outcome of a case, the Head of Safeguarding in consultation with Group Human Resources will support the Foundation to assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This action will be dependent on the outcome of any criminal investigation.

Due consideration will be taken with any decision made; particularly where there is insufficient evidence to uphold any criminal action by the Police. In such cases, the Foundation will reach a decision based upon all the available information which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child or adult at risk should remain of paramount importance throughout the decision making process.

Management of allegations - Member of Staff/Volunteer (1 of 2)

- It is expected that any suspicion or concern arising outside the immediate sporting environment is reported immediately to the Safeguarding Team.
Management of allegations - Member of Staff/Volunteer (2 of 2)

Safeguarding concern / allegation referred to the Safeguarding Team
Assessment of concern - risk management: CRIMINAL, HARM, UNSUITABLE BEHAVIOUR

Management of Allegations

Children & Young People
Local Area Designated Office (LADO)
Adults at Risk

CRIMINAL / HARM
Professional Abuse Strategy Meeting led by Local Authority

Statutory legal action, possibly involving criminal prosecution.

No further action from agencies involved. Discipline action (option of termination). Affiliated Football sanctions may apply.

Implementation of training, supervision & monitoring by the Safeguarding Team and Group HR

The Head of Safeguarding to lead the review of case management and implement learning from the review process
The Foundation’s Safeguarding Escalation Process

Staff/Volunteer report to Line Manager or Departmental Safeguarding Officer
a safeguarding/welfare concern is identified with a child/adult at risk

Departmental Safeguarding Officer
manage poor practice/low risk child/adult at risk welfare concerns — seeking advice from the Safeguarding Team.
Ensuring that appropriate documentation is completed & shared with the Safeguarding Team.

Group HR Safeguarding Team
manage high risk child/adult at risk welfare cases
manage cases involving staff or volunteers

MUF Executive Management Team
Generic notification of high risk cases by the Safeguarding Team at the time of referral;
specific details will be disclosed to the EMT Manager and CEO. All cases logged on MUF Safeguarding Case Database and overview communicated quarterly. Update provided periodically on case status report

External Communications
Where the nature of the case requires, the following agencies will be notified:
Police — advised by the Safeguarding Team (or staff member is the risk if deemed imminent)
Local Authority — advised by the Safeguarding Team (or by staff member if the risk is deemed imminent)
The Premier League/The FA — advised by the Safeguarding Team
Parents/Carers — advised by the Safeguarding Team
Charity Commission — decision made by the Board of Trustees to refer serious incidents
Others — advised by the Safeguarding Team where identified

MU Internal Communication
Where the nature of the case requires, the following functions will be notified:
Board of Trustees — Chair and Safeguarding lead of the Board of Trustees advised by CEO, Trustees informed via quarterly safeguarding report
Group Human Resources — advised by Safeguarding Team
Director of Communications — advised by Safeguarding Team
General Counsel — advised by Safeguarding Team

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Crisis Management Guidance

Safeguarding Officers and Senior Management are advised to familiarise themselves with the document ‘Crisis Management Guidance for Safeguarding’, which details the internal steps that will be taken to appropriately manage cases where a high risk safeguarding case has taken place.

Supervision and Support

Managing a child, young person or adult at risk through challenging episodes including a disclosure of abuse can be stressful and upsetting for staff. This emotive topic can be difficult for managers supporting their staff as well. It is important that staff and managers engage with the Safeguarding Team particularly after an incident to ensure that appropriate support, counselling and supervision can be actioned for staff involved.

Dealing with complaints

Complaints which highlight a safeguarding concern will result in the Head of Safeguarding leading an investigation, as per the management of allegations procedure. Complaints can be received via the Charter System Address (Charter@manutd.co.uk). Safeguarding disclosures can be closed and referred to CCT to be treated as a complaint. The Clubs Charter will be followed in this instance and reported on, on a weekly basis in line with current management complaint reporting procedures. If appropriate, copies of minutes of the relevant meetings, planning, agreed next steps and conclusion maybe shared. All Human Resources Policies and Procedures will be followed if the complaint is against a member of staff or volunteer.
Record Keeping

The management of good and up to date record keeping of concerns and action taken is essential in safeguarding for two main reasons:

- It assists the Foundation to identify causes for concern at an early stage.
- It helps the Foundation monitor and manage its safeguarding practices. Furthermore, in any audit, it will be important to provide evidence of robust and effective safeguarding policy and practice.

A record of concern, suspicion or allegation should be made at the time or as soon as possible after the event. (N.B It is not advisable to make a written record whilst a child is disclosing abuse, as it may deter the child from speaking).

All records of welfare, safeguarding or child protection concern, disclosures or allegations are to be treated as sensitive information and will be managed in accordance with data protection legislation by the Safeguarding Team (who will seek input from the Group Data Protection Officer if appropriate).

The information should only be shared with relevant parties, whether to enable them to take appropriate steps to safeguard a child, adult at risk or to enable them to carry out their own duties; it should not be shared wider than that (and any sharing must be done in accordance with any applicable data protection legislation).

Case Reporting

In order to support the case reporting process to the Executive Management Team and Board of Trustees, adult at risk concerns will be escalated as adult at risk safeguarding concerns. For Children and Young People, the following sub-categories have been defined.

- Child protection - children identified as suffering or likely to suffer significant harm under one of the four categories of abuse; neglect, physical, sexual and emotional.
- Welfare - anything that has a direct impact on a child’s physical, intellectual, emotional, social and behavioural developmental needs yet does not place a child at immediate risk of significant harm.
- Staffing cases will be assigned to either a category of abuse or referenced as poor practice /conduct.
Voicing Concerns

All those involved in the Foundation in whatever capacity and at every level have a duty and responsibility that goes beyond just compliance with the law. The Foundation has adopted the Club Whistleblowing Policy (Appendix 4).
Safeguarding Roles & Responsibilities

Manchester United has appointed a Head of Safeguarding, who provides strategic leadership on safeguarding, case management and safer recruitment across the Club and its partners. As part of the service level agreement with Group HR, the Head of Safeguarding is responsible for safeguarding in the Foundation and ensures on its behalf compliance with the Premier League Rules section ‘S’: The Safeguarding of Vulnerable Groups and Safer Recruitment.

The Head of Safeguarding will manage the Safeguarding Team and direct the Safeguarding Officers appointed by the Foundation to maintain and embed safeguarding within the operations of the Foundation. Those individuals who take on safeguarding roles within their contracted roles will also be given an additional job description, comprehensive training and supervision to support them in their role.
Working with our Partners

The Foundation has developed effective relationships with stakeholders, agencies and partners in ensuring the Foundation’s safeguarding obligations are embedded in practice for activities which engage with Vulnerable Groups. This is achieved by Foundation representatives engaging with the Safeguarding Team prior to an activity having sign off.

The use of a Service Level Agreement and/or implementation of the Check and Challenge Partnership Tool, will ensure the assessment of partner suitability of safeguarding; measuring current safeguarding policies and procedures against the provision the Foundation; establishing how any safeguarding concerns that subsequently arise will be managed; knowing each partners’ safeguarding contacts. For the benefit of doubt, the principles of English Law will be adopted for partnership work operating outside of England.
Appendices

Appendix 1: Anti-Bullying Policy
Appendix 2: E-Safety Policy
Appendix 3: Additional Safeguarding Categories of Abuse
Appendix 4: Manchester United Whistleblowing Policy
Appendix 5: Manchester United Safeguarding Referral Form
Appendix 6: Internal Safeguarding Contact Details
Appendix 7: External Safeguarding Contact Details
Appendix 8: Supporting Safeguarding Guidance
Appendix 1: Anti-Bullying Policy (1 of 3)

Statement of Intent
The Foundation is committed to providing a caring, friendly and safe environment for all of our participants. Bullying of any kind is unacceptable in our Foundation. If bullying does occur, all participants or parents/carers and staff should be able to report an incident and know that incidents will be dealt with promptly and effectively.

We are a TELLING Foundation. This means that anyone who knows that bullying is happening is expected to report an incident to a safeguarding officer or a member of staff, who will report any information to the safeguarding team.

Objectives of this Policy
• All participants, parents/carers and staff should have an understanding of the meaning of bullying.
• All participants, parents/carers and staff should be aware of the anti-bullying policy.
• As a Foundation, we take bullying seriously. Participants and parents/carers should be assured that they will be supported when bullying is reported.
• Bullying will not be tolerated.

What is Bullying?
Bullying is behaviour that is intended to hurt someone physically or emotionally, is often repeated and is commonly aimed at certain groups (for example, because of disability, gender, gender reassignment, religion and/or sexual orientation). Bullying can result in pain and distress to the victim and may be:
• Discriminatory - racial taunts, graffiti, gestures, homophobic comments, jokes about disabled people, sexist comments.
• Emotional - being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting, (e.g. hiding football boots/shin guards, threatening gestures)
• Physical - pushing, kicking, hitting, punching or any use of violence.
• Sexual - unwanted physical contact or sexually abusive comments.
• Verbal - name-calling, sarcasm, spreading rumours, teasing.

Why is it important to respond to bullying?
• Bullying hurts.
• No-one deserves to be a victim of bullying.
• Everybody has the right to be treated with respect.
• Individuals who are bullying need to learn different ways of behaving.
• Manchester United has a responsibility to respond promptly and effectively to issues of bullying.
Appendix 1: Anti-Bullying Policy (2 of 3)

Signs and Indicators
A participant may indicate that they are being bullied. The signs and indicators of bullying are not listed in order of severity or importance.

- says they are bullied, describes what appears to be an abusive act.
- someone expresses concern about the welfare of an individual.
- is unwilling to go to sessions.
- becomes withdrawn, anxious, or lacking in confidence.
- comes home with clothes torn or training equipment damaged.
- has possessions go “missing”.
- asks for money or starts stealing money (to pay the bully).
- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries.
- is frightened to say what’s wrong.
- gives improbable excuses for any of the above.
- distrust of adults particularly those with whom a close relationship would be expected.
- difficulty making friends.
- difficulty in socialising with others.
- displays variations in eating patterns including overeating or loss of appetite.
- weight loss for no apparent reason.
- becomes increasingly dirty or unkempt.
- starts stammering.
- cries themselves to sleep at night or has nightmares.
- becomes aggressive, disruptive or unreasonable.
- is bullying other children or siblings.
- stops eating.
- attempts or threatens suicide or runs away.
- engaging in sexually explicit behaviour.

Bullying as a result of any form of discrimination
Bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation.

- If an incident occurs, staff and participants should be informed that discriminatory language is offensive, and will not be tolerated. If discriminatory remarks continue to be made, explain in detail the effects that discrimination and bullying has on people. If it is a young person making the remarks their parents should be informed just as in any breach of this policy.
- If persistent remarks are made, the participant should be removed from the training setting in line with managing challenging behaviour and Safeguarding Officer notified, so that they can talk to them in more detail about why their comments are unacceptable.
- If the problem persists, the participant should be made to understand the sanctions that will apply if they continue to use discriminatory language or behaviour.
- Consider inviting the parent to the Foundation to discuss the attitudes of the participant in line with the procedures detailed in this policy.
Appendix 1: Anti-Bullying Policy (3 of 3)

Cyberbullying

This is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. Bullies often feel anonymous and ‘distanced’ from the incident when it takes place online and ‘bystanders’ can easily become bullies themselves by forwarding the information on.

The Foundation is committed to ensuring its websites and social networking pages are being used appropriately and any online bullying will be dealt with swiftly and appropriately in line with procedures detailed in this policy.

Roles and responsibilities

All staff should ensure that they read this policy and understand their responsibilities under the policy. The Head of Safeguarding will advise, and manage cases of bullying with Safeguarding Officers to ensure that incidents of bullying are taken seriously and responded to swiftly and appropriately.

Ownership of the Policy

This policy has been produced and reviewed in consultation with participants under the age of 18 from the Foundation’s Regional Talent Centre.

Procedures

In the case of adults or staff in positions of trust being reported to be bullying individuals under the age of 18 years, the Head of Safeguarding must be notified and the management of allegations will be activated; this may include action by Group HR.

The Foundation has at its discretion the option to refer serious cases to Statutory Services.

- Report Bullying
- Head of Safeguarding will manage referral or advise Safeguarding Officer
- Parents to be informed and consulted with young person
- Risk Assessment to identify if the Police need to be consulted
- The alleged bully (and for u18, their parents), will be informed and consulted
- Decision of mediation or disciplinary action
- Training and awareness for vulnerable groups and staff
Appendix 2: E-Safety Policy (1 of 3)

Statement of Intent
The purpose of this policy is to provide a building block for staff and volunteers to be aware of safer working practice in relation to social media, keeping personal and professional lives separate, keeping safe when using electronic media and adopting responsible behaviour that should protect staff from putting themselves and their career at risk. This policy works collaboratively with the Manchester United Social Media Policy.

Legal Consequences
All staff and volunteers who have access to online services through work networks and their own personal use should be reminded of the legal consequences attached to the inappropriate use of those services. The following examples can lead the Foundation to action disciplinary proceedings against staff or volunteers: inappropriate or offensive material include racist material, pornography, sexually explicit images, texts and related material, the promotion of illegal activity, or intolerance of others.
Appendix 2: E-Safety Policy (2 of 3)

Summary of Best Practice Principles:

The appropriate use:

1. Set your privacy settings for any social networking site to ensure only the people you want have sight/access to the contents. Keep these updated. The default settings for most social networking sites are set to open access where anyone can see everything.
2. Ensure your mobile phone (any technological equipment) is password/PIN protected. This will ensure that other people cannot use your equipment and get you into trouble.
3. Consider having separate personal and professional online identities/accounts if you wish to have online contact with service users i.e. children and young people, their families and other professionals. Ensure that your manager is aware of your professional online persona before any communication commences.
4. Make sure that all information about you that is publicly available is accurate and appropriate – think particularly about whether photographs/stories that you may have posted in your personal life are appropriate for a person with a professional life and a reputation to lose. If you do not want it to be public, do not put it online.
5. Remember that online conversations may be referred to as ‘chat’ but they are written documents and should always be treated as such. Be mindful about how you present yourself when you are publishing information about yourself or having ‘conversations’ on-line.
6. Make sure that you are aware of the Foundation’s policy regarding the use of both organisational and personal digital equipment and the consequences of misuse. Breach of the policy can result in capability/disciplinary actions by your employer, professional body and criminal proceedings by the police.
7. Err on the side of caution. If you are unsure who can view online material, assume that it is publicly available. Remember - once information is online you have relinquished control of it. Other people may choose to copy it, to edit it, to pass it on and to save it.
8. Switch off any Bluetooth capability any device may have installed as standard. Bluetooth allows another person to have access to your equipment – they can then pretend to be you.
9. Always be aware that technology is constantly upgrading and improving. You may have access to websites via a work-provided smart phone that are blocked by your computer. Mobile phones come with locator software. Cameras can be a feature of games consoles. When you receive any new equipment (personal or private) make sure that you know what features it has as standard and take appropriate action to disable/protect.

The inappropriate use:

1. Do not give your personal information to service users i.e. children/young people, their parents/carers. This includes personal mobile phone numbers, social networking accounts, personal website/blog URLs, online image storage sites, passwords/PIN numbers etc.
2. Do not use your personal mobile phone to communicate with service users i.e. children/young people or parents/carers either by phone call, text, email, social networking site.
3. Do not use the internet or web-based communication to send personal messages to service users i.e. children/young people, parents/carers.
4. Do not share your personal details on a social network site with service users i.e. children/young people, their parents or carers. This includes accepting them as friends. Be aware that belonging to a ‘group’ may give ‘back door’ access to your page even though you have set your privacy settings to family and friends only.
5. Do not add/allow service users i.e. a child/young person, their parents/carers to join your contacts/friends list on personal social networking profiles.
6. Do not use your own digital camera/video for work. This includes integral cameras on mobile phones.
7. Do not play online games with service users i.e. children, young people, their parents or carers. This can be difficult when the culture is to play with ‘randoms’. Check out before you play online with someone you do not know.
Appendix 2: E-Safety Policy

Reporting concerns about possible online abuse

All staff and volunteers should be familiar with reporting concerns to the IT helpdesk. Where a situation may include a vulnerable group or be a breach in safer working practice, the Safeguarding reporting procedures must be followed.

In addition to referring concerns to the Safeguarding Team, you should immediately report online concerns to the Child Exploitation and Online Protection Centre (CEOP) or the police. The Safeguarding Team can support you with this. It is important that if you have in your possession indecent images of a child, these must not be forwarded on regardless.

In the UK, you should report illegal sexual child abuse images to the Internet Watch Foundation at www.iwf.org. Reports about suspicious behaviour towards children and young people in an online environment should be made to the Child Exploitation and Online Protection Centre at www.ceop.uk

Where a child or young person may be in immediate danger, always dial 999 for police assistance.
Appendix 3: Additional Safeguarding Categories of Abuse (1 of 4)

This policy acknowledges that there are a variety of abuse categories that staff must make themselves aware of. The list is not exhaustive and staff/volunteers must familiarise themselves with Local Authority guidelines and policies for the Local Authorities they work and volunteer.

**Child Sexual Exploitation (CSE)**
A type of sexual abuse in which children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

**Female genital mutilation (FGM)**
FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act, 2003 makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. It also makes it illegal to aid, abet, counsel or procure the carrying out of FGM abroad.

There are no health benefits to FGM and it is likely to cause severe immediate medical effects (such as bleeding, shock, wound infections, severe pain) as well as longer term medical consequences (such as abnormal periods, damage to the reproductive system including infertility, complications in pregnancy and newborn deaths). Longer term consequences also include psychological damage such as low libido, depression and anxiety. FGM is a very complex issue and should be dealt with sensitively. Issues will likely involve a number of agencies working together including specialist police officers, health, social care and education.

**Forced marriage**
A forced marriage is a marriage in which one or both of the parties are married without their consent or against their will. It is recognised as a form of violence against women, men or children and is a serious abuse of human rights.

Forced marriage differs from an arranged marriage, where family members take the lead in choosing the partner but both parties are free to choose whether they marry the chosen partner or not.

Forced marriage is illegal in England and Wales. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence from June 2014 to force someone to marry.

In a situation where there is concern that an adult is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as it involves a criminal offence and urgent action may need to be taken.
Appendix 3: Additional Safeguarding Categories of Abuse (2 of 4)

**Hate crime**
A hate crime is any incident or criminal offence that is motivated by hostility or prejudice based upon the victim’s:

- Disability
- Race
- Religion or beliefs
- Sexual orientation
- Transgender identity

It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

Hate crime can take many forms, including:

- Physical attacks, such as physical assault, damage to property, offensive graffiti and arson
- Threat of attack, including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate and unfounded, malicious complaints
- Verbal abuse, insults or harassment taunting, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes, and bullying at school or in the workplace
- A victim does not have to be a member of the group at which the hostility is targeted; anyone can be a victim of a hate crime.

If a person is convicted of a criminal offence, and hostility in relation to any of the above five categories is proven, then any sentence they receive will be increased to take into account that it is a hate crime.

**Honour-based violence (HBV)**
HBV is a crime or incident which has or may have been committed to protect or defend what is perceived to be the ‘honour’ of the family or community. HBV is a violation of human rights and may be a form of domestic and/or sexual violence. It can be used to control behaviour within families or other social groups to protect perceived cultural or religious beliefs.

Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Some of these victims will contact the police or other organisations. However, many others are very isolated and controlled that they are unable to seek help. In some circumstances a victim’s immigration status may be used to dissuade them from seeking assistance from the authorities, particularly if they are dependent on their spouse.

Adult safeguarding concerns that may indicate honour-based violence include domestic violence, concerns about forced marriage, enforced house arrest and missing person’s reports. If an adult safeguarding concern is raised, and there is a suspicion that the adult is the victim of honour-based violence, referring to the police must always be considered as they have the necessary expertise to manage the risk. It is the responsibility of the police to initiate and undertake a criminal investigation.

All practitioners working with victims of honour-based violence need to be aware of the “one chance” rule, which is that agencies may have one chance to speak to and safeguard a potential victim. This means that all staff who may come across victims of honour-based violence need to be aware of their responsibilities in these situations.
Modern Slavery

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

A person commits an offence if:

• The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
• The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

• Forced to work - through mental or physical threat;
• Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
• Dehumanised, treated as a commodity or bought and sold as 'property';
• Physically constrained or has restrictions placed on his/her freedom of movement

Whilst modern slavery is a global problem, the scale of modern slavery in the UK is significant. A number of active organised crime groups are involved in modern slavery. However it is also committed by individual opportunist perpetrators. There is no typical victim of slavery; they can be men, women and children of all ages and ethnicities. Victims may have been brought here from overseas, but they may also be vulnerable UK citizens. Recent court cases have found homeless adults promised paid work opportunities with the reality being enslaved and forced to work and live in dehumanised conditions, and adults with a learning difficulty restricted in their movements and threatened to hand over their finances and work for no gains.

From 1 November 2015, Section 52 of the Modern Slavery Act 2015 specifies that public authorities have a duty to notify the Secretary of State of any individual identified in England and Wales as a suspected victim of slavery or human trafficking. Manchester United will embrace the ethos of this legislation and work with statutory agencies if there is a concern.
Appendix 3: Additional Safeguarding Categories of Abuse

Prevent - Radicalisation

Radicalisation is comparable to other forms of exploitation, such as grooming and child sexual exploitation. Radicalisation can be defined as the process by which people come to support terrorism and violent extremism, and in some cases participate in terrorist groups and activities.

Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

There is no clear profile of a person who is more likely to become radicalised. The process of radicalisation varies from person to person, as does the timescale of the radicalisation process. However, there are some factors that may make an individual susceptible to exploitation by violent extremists, for example identity or personal crisis, unemployment or underemployment, family or friends involved in extremism and relevant mental health issues. None of these factors should be considered in isolation but in conjunction with the particular circumstances of the individual.

The PREVENT strategy was launched by the Home Office in 2011. Prevent is part of the Government’s counter-terrorism strategy CONTEST and aims to provide support and re-direction to vulnerable individuals at risk of being groomed into terrorist activity before any crimes are committed.

Disrupting terrorist activity, preventing radicalisation and supporting those vulnerable to becoming involved in violent extremism is a shared responsibility under Prevent and its related safeguarding element known as Channel.

Since 1 July 2015 the Counter-Terrorism and Security Act 2015 places a duty on certain bodies to have ‘due regard to the need to prevent people from being drawn into terrorism’. This includes Local authorities; Schools (excluding higher and further education); further education; higher education; the health sector; prisons and probation and the police.
Appendix 4: Manchester United Whistleblowing Policy

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. Manchester United Foundation believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation, the Foundation believes it can help prevent malpractice - prevention is better than cure. That is one of the aims of this policy.

By encouraging a culture of openness Manchester United Foundation wants to encourage workers to raise issues, which concern them at work. Workers have a right and duty to raise matters of concern they may have about the services being offered by Manchester United Foundation or serious malpractice associated with them. Workers may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment, or risking their job security. However, all staff are protected by law if they raise concerns in the right way. Provided they are acting in good faith, it does not matter if they are mistaken.

By knowing about malpractice at an early stage Manchester United Foundation stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please do not hesitate to “blow the whistle” on malpractice.

This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in Manchester United Foundation whereby issues raised by workers will be addressed quickly and effectively. The policy also sets out the legitimate course of action, which may be taken by the worker to raise issues with parties outside the Foundation if an issue is not addressed by the Foundation, or it is felt that by raising it internally may lead to evidence of malpractice being concealed. The purpose of this policy is to outline how workers may deal with concerns about other workers and/or service provision which may have an impact or threaten the wider public interest.

Please note that this policy does not affect the existing Grievance Procedure. If workers have a complaint about their own personal circumstances then they should use the normal Grievance Procedure. If workers have concerns about malpractice within the organisation then they should use the procedure outlined in this policy. This policy is applicable to all Manchester United Foundation workers. Advice and further information should be sought from Manchester United’s Group Human Resources Department with regard to the implementation of this policy.

Manchester United Foundation has adopted the Manchester United Whistleblowing Policy which is available upon request. The Foundation is in the process of developing its own Whistleblowing Policy.
Appendix 5: Manchester United Safeguarding Referral Form

A Safeguarding referral form is available as a word document on the following link:

http://cms.manutd.com/~/media/16948CDF11FA463CA1355ECB4E9B3F2D.ashx

Please email this form to safeguarding@manutd.co.uk within 24 hours of the incident.
Appendix 6: Internal Safeguarding Contact Details (1 of 2)

Manchester United’s Safeguarding Team

Head of Safeguarding
Jo Madyarchyk
Office: 0161 868 8954
Email: joanna.madyarchyk@manutd.co.uk

Club Safeguarding Coordinator
Elise Noblet
Office: 0161 868 8684
Email: elise.noblet@manutd.co.uk

General Enquiries
Office: 0161 868 8000
Email: safeguarding@manutd.co.uk

The Foundation - Executive Management Team

Chief Executive
John Shiels
Email: john.shiels@mufoundation.org

Director of Finance & Compliance
Gill Rouch
Office: 0161 868 8957
Email: gill.rouch@mufoundation.org

Head of Communications
Rebecca Newton
Office: 0161 868 8602
Email: rebecca.newton@mufoundation.org

Operations Director
John Eades
Office: 0161 868 8324
Email: john.eades@mufoundation.org
Appendix 6: Internal Safeguarding Contact Details (2 of 2)

The Foundation - Safeguarding Officers

**Communications**
Tom Jones  
Office: 0161 868 8027  
Email: tom.jones@mufoundation.org

**Operations:**

**Community Engagement Manager**
Philippa Harrison  
Office: 0161 868 8652  
Email: philippa.harrison@mufoundation.org

**Community Engagement - Choir**
Jan Quinn  
Office: 0161 868 8611  
Email: jan.quinn@mufoundation.org

**Community Engagement - Disability & Inclusion**
Alex Wilson  
Office: 0161 868 8463  
Email: alex.wilson@mufoundation.org

**Football Contracted Services**

Ciaran Donnelly  
Email: ciaran.donnelly@mufoundation.org

Hannah Mitchell  
Office: 0161 868 8199  
Email: hannah.mitchell@mufoundation.org

Emma Fletcher  
Office: 0161 868 8612  
Email: emma.fletcher@mufoundation.org

**Schools - Primary**
Jennifer Mildenhall  
Email: jennifer.mildenhall@mufoundation.org

**Foundation Office - General Enquiries**
Office: 0161 868 8600  
Email: enquiries@mufoundation.org
Appendix 7: External Safeguarding Contact Details

999 Emergency telephone number
101 Non-emergency telephone number
Greater Manchester Police Safeguarding Vulnerable Persons Unit
Office hours:
0161 856 6411 - 0161 856 5017 - 0161 856 7484
publicprotection.division@gmp.pnn.police.uk

0845 251 5000
The criminal record (DBS) umbrella body for Manchester United and the Foundation.

0300 061 6161
Independent regulator of health and social care in England

0845 210 8080
The National Governing Body

0300 123 1231
Independent inspection and regulator of services that care for children and young people, and services providing education and skills for learners of all ages

Greater Manchester Probation Trust
0161 872 4802
gmpt.contact@manchester.probation.gsi.gov.uk

The national domestic violence hotline
0808 20000 247

MIND Greater Manchester (Mental Health)
0161 226 9907

Childline
0800 111

Salvation Army – modern slavery & human trafficking
0300 3038151
safeguarding@salvationarmy.org.uk

GBG

safeguarding@premierleague.com
The Affiliated league responsible for governance of safeguarding
## Appendix 7: External Safeguarding Contact Details (2 of 3)

### Children & Young People - Local Authorities

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Office Hours</th>
<th>Out of Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bolton</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;North: 01204 337 408 / 331 505&lt;br&gt;South: 01204 337 729 / 337 730&lt;br&gt;West: 01942 634 625&lt;br&gt;Out of Hours: 01204 337 7777</td>
<td><strong>Out of Hours</strong></td>
</tr>
<tr>
<td><strong>Bury</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 253 5678</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 253 6606</td>
</tr>
<tr>
<td><strong>Manchester MASH (Multi Agency Safeguarding Hub)</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 219 2843</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 234 5001 (24 hrs)</td>
</tr>
<tr>
<td><strong>Oldham</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;Under 16s: 0161 770 3790 / 3791&lt;br&gt;16 and over: 0161 770 6599 / 6598</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 770 6936</td>
</tr>
<tr>
<td><strong>Rochdale</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0300 303 0440</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0300 303 8875</td>
</tr>
<tr>
<td><strong>Salford RIAT (Referral &amp; Initial Assessment Team)</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 603 4500</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 794 8888</td>
</tr>
<tr>
<td><strong>Stockport</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 217 6028</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 718 2118</td>
</tr>
<tr>
<td><strong>Tameside</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 342 4101</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 912 2020</td>
</tr>
<tr>
<td><strong>Trafford MARAT (Multi Agency Referral Assessment Team)</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;0161 912 5125</td>
<td><strong>Out of Hours</strong>&lt;br&gt;0161 912 2020</td>
</tr>
<tr>
<td><strong>Wigan</strong></td>
<td><strong>Office Hours</strong>&lt;br&gt;01942 828 300</td>
<td><strong>Out of Hours</strong>&lt;br&gt;01942 828 777</td>
</tr>
</tbody>
</table>

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### Safeguarding Vulnerable Groups Policy

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### Appendix 7: External Safeguarding Contact Details (3 of 3)

**Adults at risk - Local Authorities**

<table>
<thead>
<tr>
<th>Location</th>
<th>Office Hours Postcode</th>
<th>Out of Hours Postcode</th>
<th>Postcode BL1, BL2, BL6, BL7</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bolton</strong></td>
<td>01204 337 000</td>
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<td><strong>Tameside</strong></td>
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<td><strong>Wigan</strong></td>
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</table>

**Manchester MASH**

Office Hours: 0161 234 5001 (24 hrs)

**Trafford TARGet (Trafford Adults at Risk Group)**

Office Hours: 0161 912 5127

Out of Hours: 0161 912 2020

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**Bolton Office Hours**

Postcode BL3, BL4, BL5: 01204 337 000

Postcode BL1, BL2, BL6, BL7: 01204 333 410

Out of Hours: 01204 337 7777

**Bury Office Hours**

0161 253 5151

Out of Hours: 0161 253 6606

**Manchester MASH Office Hours**

0161 234 5001 (24 hrs)

**Oldham Office Hours**

0161 770 1515

Out of Hours: 0161 770 6936

**Rochdale Office Hours**

0300 303 8866

Out of Hours: 0300 303 8875

**Salford Office Hours**

0161 212 4323

Out of Hours: 0161 794 8888

**Stockport Office Hours**

0161 912 5127

Out of Hours: 0161 912 2020

**Tameside Office Hours**

0161 342 2400

Out of Hours: 0161 912 2020
Appendix 8: Supporting Safeguarding Guidance

In addition to the Safeguarding Vulnerable Groups Policy and Procedures, there are a number of additional policies, procedures and guidance in place to support vulnerable groups, staff, volunteers and parents/carers to understand Manchester United and the Foundation’s commitment to safeguarding. In addition, similar documents have been referenced for affiliated football.

The list is not exhaustive. For further information please contact the Safeguarding Team.

**Academy**
- Academy players on loan or work experience
- Academy welfare and player care philosophy
- Host Families - Accommodation Provision
- Transporting vulnerable groups
- U18s playing in the first team

**Foundation**
- Code of Conduct
- Community Cohesion Guidance: Carrying Offensive Weapons
- Transport Policy

**Health & Safety**
- Health & Safety Policy
- Young Workers Policy – risk assessments

**Safeguarding Team**
- Crisis Management Guidance for Safeguarding
- Management of criminal records Policy & Procedures
- Supporting guidance on Recruitment and selection of staff and volunteers in positions of trust
- United Images of Children – on and off the pitch

**Group Human Resources**
- Codes of ethics and conduct/behaviour.
- Disciplinary procedures
- Equality & Promoting Diversity
- Recruitment and selection of staff and volunteers
- Young Workers Policy

**Affiliated Football**
- The Affiliated Football Safeguarding Policy

**The Football Association**
- Safeguarding Children Policy

**The Premier League**
- Guidance on safer working practice
- Premier League Rules Section S: Safeguarding of Vulnerable Groups & Safer Recruitment