



# Safeguarding Children and Adults at Risk

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## Policy and Procedures

Issue date: June 2022

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**Engage. Inspire. Unite.**

# Contents

Appendix 3: Guidance for Interacting with  
Children Online

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## Mathematics

# Safeguarding Children and Adults at Risk Policy (1 of 2)

## We recognise that:

- The welfare of children and adults at risk is paramount
- All children and adults at risk, 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 children, adults at risk, 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 and adult at risks who receive services from Manchester United Foundation or its partners
- To provide colleagues with guidance on procedures they should adopt in the event that they suspect a child or adult at risk may be experiencing, or be at risk of, harm
- NB: This policy applies to all staff, including permanent, casual or volunteers regardless of their role that work on behalf of Manchester United Foundation and vulnerable groups engaging with Manchester United Foundation

## We will seek to safeguard children and adults at risk by:

- Valuing them by hearing, listening and respecting them
- Adopting safeguarding guidelines and best practice through procedures and a code of conduct for colleagues
- Safely recruiting colleagues 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 colleagues through supervision, support, mentoring and training in accordance with the requirement and time frames of the Safeguarding Workforce Development Plan

## Child protection v protection of adults at risk

Although children and adults at risk can experience the same types of harm and the causes are often similar, the main difference between child protection and adult protection hinges on the right to make a choice.

Where a child is at risk of serious harm, or has been seriously harmed, it is likely that action would be taken by Statutory Services to protect them whether or not the parents/guardians agreed.

Sometimes adults at risk do not want Statutory Services to take action to protect them from harm. Taking action to protect them against their will can create a dilemma and staff are required to consult with the Safeguarding Team to ensure a balance between ‘the need to protect’ and the rights of the adult is attained.

## Definitions:

A child is any person under 18 years.

An adult at risk is 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.

# Safeguarding Children and Adults at Risk Policy (2 of 2)

## Roles and responsibilities

All colleagues 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 Designated Safeguarding Officers are responsible for the day-to-day implementation of safeguarding and safer recruitment within the Foundation.

We are committed to reviewing and evaluating our policies, procedures and best practice guidelines on a regular basis including to ensure compliance with our legal and regulatory obligations, Affiliated Football Safeguarding Requirements, Section S of the Premier League’s Handbook and the principles contained in the Government’s ‘Working Together to Safeguard Children 2018’ guidance, for areas engaged with education we will adopt the guidance of Keeping Children Safe in Education 2018, and advocate the six guiding principles of safeguarding adults from the Care Act 2014 (sections 42 - 46) and the Care Act Guidance of 2016 of protection, prevention, partnership, proportionality, empowerment and accountability.

# Commitments



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.

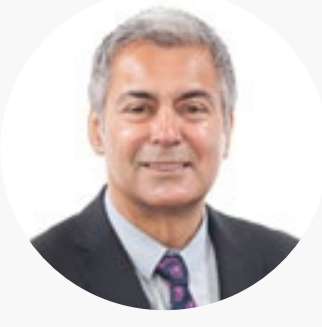
**Richard Arnold**  
CEO, Manchester United and Chair  
of the Board of Trustees, Manchester United Foundation



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 colleagues, 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 MBE**  
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.

**Tarun Kapur CBE**  
Chief Executive and Academy Principal of The Dean Trust and  
Manchester United Foundation Trustee – safeguarding lead





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# Poor Practice, Low Level Concerns and Abuse

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# Poor Practice

This takes place whenever staff or volunteers fail to fulfil 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, Grievance and Harassment 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)**



# Low Level Concerns

This policy sets out a framework whereby colleagues and volunteers working with children and adults at risk for Manchester United Football Club Group are expected to report concerns, no matter how small, about their own behaviour or that of another individual (colleague, volunteer, contractor). Working in conjunction with the Safeguarding Children and Adults at Risk policy, its purpose is to help create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour set out in the “Premier League Safer Working Practice Guidance” are upheld. For those working in education establishments, this policy should be read in conjunction with the current statutory guidance – “Keeping Children Safe in Education”.

## Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of MUFC Group may have acted in a way that:

- is inconsistent with the “Premier League Safer Working Practice Guidance”, and the Safeguarding Children and Adults at Risk Policy, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered of severity to make a referral to the LADO
- meets the thresholds as defined by The FA Safeguarding Concerns in the Professional Game, Referral & Threshold Document
- Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:
  - being over friendly with children
  - having favourites
  - taking photographs of children on their personal mobile phone
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating, or offensive language

Such behaviour can exist on a wide spectrum; from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, however, in specific circumstances may not be, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the MUFC Safeguarding Team, and recorded on MYCONCERN and managed appropriately. Ensuring they are dealt with effectively should also protect those individuals who have low level concerns raised against them and potential false allegations or misunderstandings.

# Abuse Categories – Children (1 of 3)

## 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, i.e 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 and scalds
	Bite marks

# Abuse Categories – Children (2 of 3)

**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

# Abuse Categories – Children (3 of 3)

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

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 detachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated 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 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 Risk (1 of 3)

**Categories of abuse:** Neglect | Physical | Sexual | Emotional (including Domestic Abuse)  
Financial | Organisational | Discriminatory | Self-neglect | Modern Slavery

**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.

**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

**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.

**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 Risk (2 of 3)

**Categories of abuse:** Neglect | Physical | Sexual | Emotional (including Domestic Abuse)  
Financial | Organisational | Discriminatory | Self-neglect | Modern Slavery

**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 practice 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 ongoing 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.

**The Care Act 2014** defines self-neglect as wide ranging & covering:

Neglecting to care for one’s personal hygiene

Neglecting to care for one’s health

Neglecting to care for one’s surroundings

Hoarding which can include:

**Inanimate objects** (commonly clothes, newspapers, books, DVDs, letters & food/packaging),  
Animals, Data

Hoarding in this case is described as the excessive collection & retention of any material to the point that it impedes day to day functioning.

This could also involve refusal of services, treatment, assessments or intervention, which could potentially improve self-care or care of one’s environment. There are other less overt forms of self – neglect such as: eating disorders; misuse of substance; and alcohol abuse. Self-neglect differs from other safeguarding concerns as there is no perpetrator of abuse, however, abuse cannot be ruled out as a purpose for becoming self-neglectful.

# Abuse Categories – Adults at Risk (3 of 3)

**Categories of abuse:** Neglect | Physical | Sexual | Emotional (including Domestic Abuse)  
Financial | Organisational | Discriminatory | Self-neglect | Modern Slavery

## 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
- 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.

**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 or Suspicions 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 colleagues 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 Discourse (1 of 2)

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

## Recognise

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 means 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.

## Respond

When harm or abuse is disclosed to you, 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 or you may identify patterns of behaviour or signs which give you cause for concern. Although it is not your role to investigate the matter, when the harm or abuse is first disclosed to you or identified then, where appropriate, you may try to obtain the basic facts from the person making the disclosure to you by asking them open questions such as:

- Who...
- When...
- What...
- Tell me...
- Where...
- Explain to me...
- Which...
- 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 Safeguarding Referral Form (a copy of which appears at the end of this policy, and can also be obtained from the Safeguarding Team).

## Record

Using the Safeguarding 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 Discourse (2 of 2)

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1

- Child 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 child 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 child or 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 make a referral

4

- Where the child 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 and line manager
- Refer to safeguarding contacts if Safeguarding Team is 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](mailto:safeguarding@manutd.co.uk) and your line manager

# Self-Referral

When colleagues identify their own poor practice or practice which could put their integrity into question, 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 Guidance for Safer Working Practice.

In addition and in accordance with the Policy for the Management of Criminal Records, colleagues are required, regardless of their role, to notify the Group HR’s Safeguarding Team immediately of anything that affects, or might affect, their suitability to work at the Company, including any reprimands, warnings, cautions, convictions, or enquiries/investigations by a statutory agency. This also extends to those working with children and/or adults at risk having children in their charge taken into care proceedings. At this stage the Safeguarding Team will risk assess what steps need to be taken including a completion of a new criminal records check, conducting an investigation and engaging with statutory services as examples.

# Confidentiality and Information Sharing

Colleagues should ensure that confidentiality protocols are followed and information is shared appropriately. All colleagues must understand that they have a professional responsibility to share information with other agencies in order to safeguard children and adults at risk. All colleagues must be clear with children and adult at risks that they cannot promise to keep secrets.

# Safeguarding Adults

## – Making Safeguarding Personal (MSP)

Making Safeguarding Personal is a shift in culture and practice in response to what we now know about what makes safeguarding more or less effective from the perspective of the person being safeguarded. It is about having conversations with people about how we might respond in safeguarding situations in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. The Safeguarding Team will guide staff and adults in achieving positive outcomes with a focus on the 6 guiding principles set out by The Care Act:

Empowerment - People are 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 - Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability - Accountability and transparency in delivering safeguarding.

It is important that adults are aware of concerns that are raised about them and what will happen with their information. If consent is not given for a statutory concern to be made, there must be documentation to support either not referring the concern or otherwise detailing why the Safeguarding Team acted in the “Best Interest” of the adult by referring without consent.

# Safeguarding Adults Capacity – Guidance on Making Decisions

The issue of capacity or decision making is a key one in safeguarding adults. Some people are only able to make some decisions, and a small number of people cannot make any decisions. Being unable to make a decision is called “lacking capacity”.

**To make a decision we need to:**

- Understand information
- Remember it for long enough
- Think about the information
- Communicate our decision

A person’s ability to do this may be affected by things like learning disability, dementia, mental health needs, acquired brain injury, and physical ill health.

The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides the framework for this to happen. The MCA is about making sure that people over the age of 16 have the support they need to make as many decisions as possible. The MCA also protects people who need family, friends, or paid support staff to make decisions for them because they lack capacity to make specific decisions. Our ability to make decisions can change over the course of a day.

**Here are some examples that demonstrate how the timing of a question can affect the response:**

- A person with epilepsy may not be able to make a decision following a seizure
- Someone who is anxious may not be able to make a decision at that point
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue

In each of these examples, it may appear as though the person cannot make a decision. But later in the day, presented with the same decision, they may be able to at least be involved.

The MCA recognises that capacity is decision-specific, so no one will be labelled as entirely lacking capacity. The MCA also recognises that decisions can be about big life-changing events, such as where to live, but equally about small events, such as what to wear on a cold day.

**To help you to understand the MCA, consider the following five points:**

Assume that people are able to make decisions, unless it is shown that they are not. If you have concerns about a person’s level of understanding, you should check this with them, and if applicable, with the people supporting them.

Give people as much support as they need to make decisions. You may be involved in this – you might need to think about the way you communicate or provide information, and you may be asked your opinion.

People have the right to make unwise decisions. The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.

If someone is not able to make a decision, then the person helping them must only make decisions in their “best interests”. This means that the decision must be what is best for the person, not for anyone else. If someone was making a decision on your behalf, you would want it to reflect the decision you would make if you were able to.

Find the least restrictive way of doing what needs to be done.

Remember: You should not discriminate or make assumptions about someone’s ability to make decisions, and you should not pre-empt a best-interests decision merely on the basis of a person’s age, appearance, condition, or behaviour.

When it comes to decision-making, you could be involved in a minor way, or asked to provide more detail. The way you provide information might influence a person’s ultimate decision. A person may be receiving support that is not in-line with the MCA, so you must be prepared to address this.

If in doubt contact the Safeguarding Team.

# Reporting and responding to low level concerns

Where a low-level concern has been identified, this should be reported as soon as possible and no later than 24 hours from having the concern. The concern should be made to the MUFC Safeguarding Team. The recording of low-level concerns follows the same process as all safeguarding concerns.

Where a low-level concern has been raised this will be taken seriously and managed promptly. The MUFC Safeguarding Team will follow the Allegations procedure within the Safeguarding Policy and the HR Disciplinary Policy will be followed to ensure all relevant information is gathered in a timely manner.

**The information reported and gathered will then be reviewed to determine whether the behaviour:**

- is consistent with the “Premier League Safer Working Practice” - no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour as part of normal day to day management processes
- The individual should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., either via the Performance Management or Disciplinary Processes
- is serious enough to consult with or refer to the LADO, including a notification to the FA

When considered with any other low-level concerns that have previously been raised about the same individual, this may result in the concern being reclassified as an allegation and referred to the LADO or Police. This will involve a referral to The FA and HR processes. Feedback will be given to both parties to explain to support learning and development in practice.

## Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, eg where a fair disciplinary investigation is needed or where a later criminal investigation is required.





# Case Management of Safeguarding Concerns

In accordance with the Premier League Rules Section S: The Safeguarding of Children and Adults at Risk, 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 Designated Safeguarding Officer or the Department Manager
- Information gathering will be completed by the Designated 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’ Community Organisations 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 FAs and clubs, and oversight of the thresholds for poor practice cases being managed locally

**If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the MUFC Chief Operating Officer as the Senior Safeguarding Lead or in their absence the General Counsel, who will duly notify statutory agencies.**

# 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. Colleagues 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



# Concerns Outside the Immediate Sporting Environment

- 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

Where there is a safeguarding complaint against a member of staff or volunteer, three types of investigation can be opened:

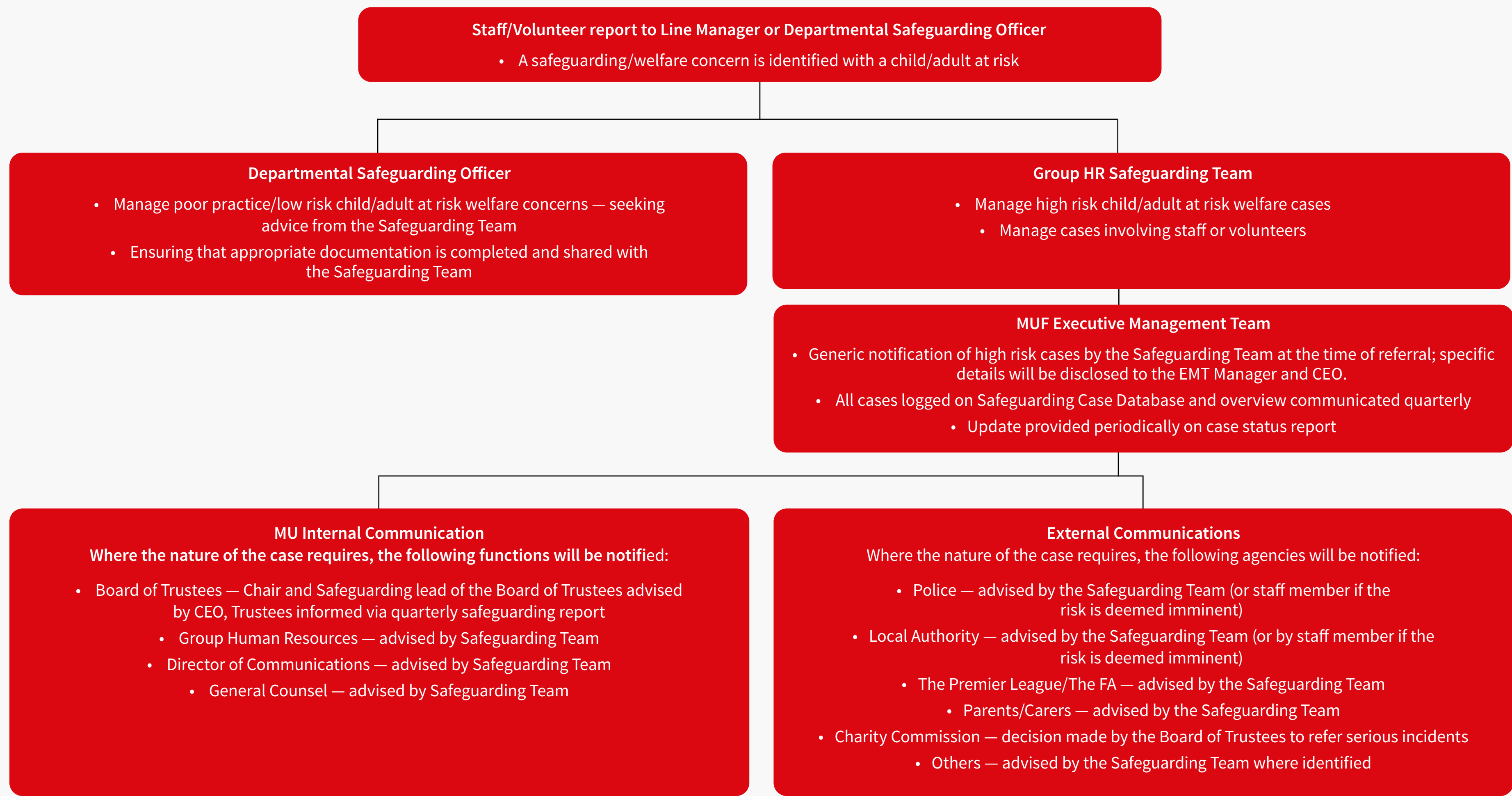
- A criminal investigation led by the police
- An investigation led in a multi-agency approach by the Local Authority
- A disciplinary or misconduct investigation led by Manchester United Safeguarding Team, which may also involve Affiliated Football.  
It is important to highlight that the results of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

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.

Where an individual is subject to an allegation, they will be provided with wellbeing support through the Employee Assistance Program and Wellbeing Hub. For individuals not eligible for these services, support will be provided by The Football Association’s partnerships.

# The Foundation’s Safeguarding Escalation Process



# Crisis Management Guidance

Designated Safeguarding Officers and Senior Management are advised to familiarise themselves with the document ‘MUFC 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 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.

# Safeguarding and Welfare complaints

A formal safeguarding and welfare complaint is defined as an expression of dissatisfaction with the acts or services of Manchester United Foundation. The Safeguarding Team will manage these complaints where the welfare and safety of a child or adult at risk was compromised in the opinion of the complainant. The fan experience and match day related complaints will be managed by Club Charter in partnership with the Safeguarding Team. The Head of Safeguarding has overall responsibility for ensuring complaints are managed accordingly. All safeguarding complaints will be recorded on MYCONCERN.

All of these complaints should be made in writing by emailing [safeguarding@manutd.co.uk](mailto:safeguarding@manutd.co.uk) and any complaints received elsewhere should be forwarded to the Safeguarding Team. Complaints received via telephone may be treated as a formal complaint at the discretion of the relevant staff member. The complainant will be informed of this, and the policy and procedures here will apply. Any complaints relating to the performance or conduct of MUFC Group colleagues or those acting on behalf of MUFC Group should be directed to the relevant Heads of Department, who will ensure that the Head of Safeguarding is briefed accordingly.

The Safeguarding Team will need to understand the nature and details of the complaint (including as much detail as possible, for example dates of occurrence, times, other people/members involved, location of the issue). If additional support or assistance is required in making a complaint, we will support in making reasonable adjustments to ensure every individual has equal access to all aspects of the complaints process.

All complaints will be acknowledged via email within three working days of receipt. A complaint may be referred to a third-party organisation where the complaint does not fall under the jurisdiction of Manchester United Foundation or where a complaint is considered to relate to a service that is provided jointly by Manchester United Foundation and a third-party organisation and following consultation with the third-party organisation; it is agreed that they are better placed to respond to the complaint.

Manchester United Foundation will provide a formal response to complaints within 21 working days of receipt of the initial complaint. Where it is not possible to provide a response within this timescale, the complainant will be informed in writing.

If the complainant is not satisfied with the outcome, they can request the complaint to be escalated to the People & Sustainability Director for complaints relating to MUFC Group and the Director of Finance and Compliance for Manchester United Foundation. Should a complainant wish to do this, they should respond to the formal outcome within 14 days of the date of delivery setting out the reasons for the request. The second stage response will follow the same response timeline as the initial complaint. Once this second stage response has been provided, there is no further internal escalation or appeals process.

**If a complaint is considered vexatious and/or the behaviour of a complainant is overly persistent, and/or making disproportionate demands on time and resources, the Head of Safeguarding will determine a course of action from the following:**

- Try to resolve the issue in accordance with these procedures, by contacting the individual in writing to explain the difficulties and to set out a preferred method of behaviour for the parties involved. This may, for example include requiring the complainant to communicate in a certain way, eg in writing or with a specific individual, limit the frequency of communications and electronically diverting communications to a specific individual
- Decline contact with the complainant or restrict contact to a specific format
- Notify the complainant in writing that the complaint has been fully responded to and there is nothing further to add; continuing contact will serve no useful purpose and that further correspondence will be acknowledged but not answered
- In extreme cases, it may be necessary to instruct legal proceedings to deter the individual from further contact
- Due regard should be given to whether the complainant has a disability, health condition or personal circumstances that may have a bearing on the complaining behaviour. In the interests of fairness, any relevant personal circumstances should be considered fully when determining an appropriate course of action

# 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, a quarterly safeguarding report will be produced by the Safeguarding Team demonstrating case management concerns.

High risk cases will activate an immediate notification by the Safeguarding Team as required by the Premier League Rules Section S, following guidance from Statutory Services, where applicable.

MYCONCERN is the case management system used to record all safeguarding concerns & complaints.

# Safeguarding Fundamentals

Manchester United Foundation works 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.

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 colleagues 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 have 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 colleagues
- 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 minimalizing 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 Section S – The Safeguarding of Vulnerable Groups and Safer Recruitment.

# Position of Trust

Those who have responsibility for, and authority or influence over children and adults at risk are in relationships of trust. 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.

The government have extended the “position of trust” offences within ss 16 – 19 of the Sexual Offences Act 2003 to include situations where certain activities take place in a sport or religion. The “position of trust” offences is intended to target situations where the child has some dependency on the adult involved, often combined with an element of vulnerability of the child.

Manchester United extends this in the policy to all individuals in a position of trust over an individual, regardless of age. This means that those in relationships of trust should not:

- Use their position to gain access to information relating to person that the individual is in a position of trust or authority over, and most certainly not an u18. for their own or others’ advantage. Such information should only be used or shared to meet the needs of the children or adult at risk
- Use their power to intimidate, threaten, coerce, or undermine a child or adult at risk
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be always maintained



# Contextual Safeguarding

Contextual Safeguarding is an approach to understanding and responding to children’s experiences of significant harm beyond their families. Traditional approaches to protecting children from harm have focused on the risk of violence and abuse from inside the home, usually from a parent/carer or other trusted adult and don’t always address the time that children spend outside the home and the influence of peers on children’s development and safety.

Contextual Safeguarding recognises the impact of the public/social context on children’s lives, and consequently their safety. Contextual Safeguarding seeks to identify and respond to harm and abuse posed to children outside their home, either from adults or other children. It’s an approach that looks at how interventions can change the processes and environments, to make them safer for all children, as opposed to focusing on an individual.



# Delegated Authority

A person with Parental Responsibility (PR) may not surrender or transfer any part of it to another person; however, a person who has PR may arrange for all or some of their responsibilities to be met in certain circumstances by someone else (including someone else who also has PR for the child). This is called ‘delegating authority’ and may be given for a particular event or arrangement (such as a medical appointment or a school trip).

# 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).

# Working with Our Partners

The Foundation has developed effective relationships with stakeholders, agencies and partners to ensure 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 and 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.

# Charity Commission

As a registered charity, the Charity Commission expects the Foundation to have adopted a ‘Serious Incident Risk Framework’ in order to demonstrate that the Foundation has identified a risk to the charity and that appropriate action has taken place to deal with the risk. In addition to the need to follow procedures to report safeguarding concerns to statutory agencies and Affiliated Football, and in cases where a person is no longer in a post due to a safeguarding concern (regardless of being dismissed, resigning, or no attending work) to the Disclosure and Barring Service, the Charity Commission requires the submission of a report if a serious safeguarding risk materialises, such as:

- Incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and this happened while they were under the care of the charity
- Someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity’s activities
- Breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and/or adults at risk


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# Appendices

# 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 Designated 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?

The NSPCC defines bullying as behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home, at work or online. It’s usually repeated over a long period of time and can hurt a person both physically and emotionally.

## Who is at risk?

Any child or adult can be bullied for any reason. If they are seen as different in some way, or seen as an easy target they can be more at risk. This might be because of their age, disability, gender, race, or religion. Or it could be because they appear anxious or have low self-esteem, lack assertiveness, or are shy or introverted. Popular or successful children/adults are also bullied, sometimes because others are jealous of them. Sometimes a person’s family circumstance or home life can be a reason for someone bullying them. Disabled children can experience bullying because they seem an easy target and less able to defend themselves

## 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 Foundation 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
- Inappropriate sexual awareness
- 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 child 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 Designated 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.

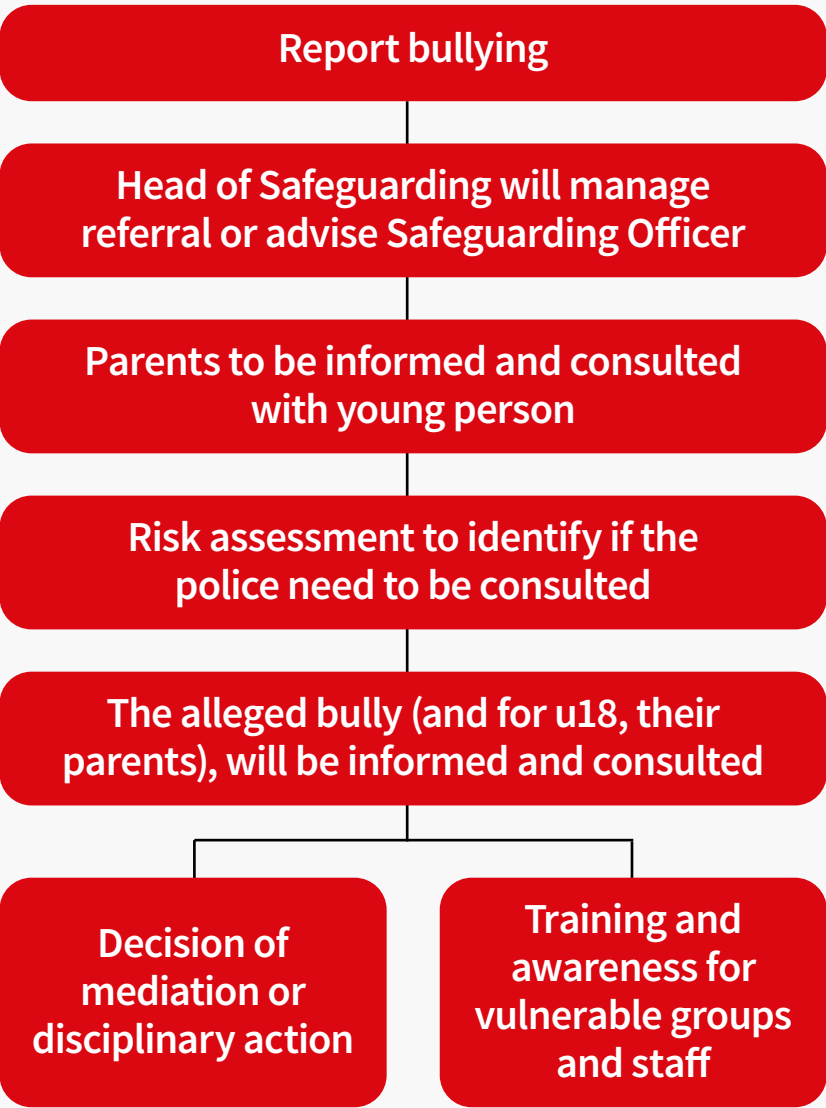
## Roles and responsibilities

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 Designated 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.



# 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 colleagues 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:

- 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
- Ensure your mobile phone (and any technological equipment) is password/PIN protected. This will ensure that other people cannot use your equipment and get you into trouble
- 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
- 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
- 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’ online
- 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
- 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, edit it, pass it on and save it
- 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
- 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:

- 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
- 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
- Do not use the internet or web-based communication to send personal messages to service users i.e. children/young people, parents/carers
- 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
- Do not add/allow service users i.e. a child, their parents/carers to join your contacts/friends list on personal social networking profiles
- Do not use your own digital camera/video for work. This includes integral cameras on mobile phones
- Do not play online games with service users i.e. children/young people, their parents/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 (3 of 3)

## Reporting concerns about possible online abuse

All colleagues 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](http://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](http://www.ceop.uk).

Where a child may be in immediate danger, always dial 999 for police assistance.

# Appendix 3: Guidance for Interacting with Children Online

This guidance has been created to support a change in working practice in response to Covid - 19. All colleagues should continue to follow the online guidance within the safeguarding policy particular with reference to not becoming friends or contacts with children that you hold a position of trust with. The following guidance has been created to support positive interactions with children who have already been engaged in MU Foundation activities and has been approved by line management.

- If recording videos or livestreaming make sure to film in a neutral area where nothing personal or inappropriate can be seen or heard in the background.
- Make sure the platform you are using is suitable for their age group. Also check the privacy settings.
- Set up professional accounts for any online platforms you use. Never use personal accounts. This also applies to communication via email.
- There must be consent from parents/carers for children to be involved in online lessons.
- Following the United Images policy, children and adults must be appropriately dressed and logged on in a communal room and not in personal spaces such as bedrooms.
- Line managers should set out clearly when it is and is not appropriate to contact children at home. If there is any doubt, the MUFC Safeguarding Team must be engaged prior to the contact being made.
- If it is appropriate to communicate with a child on an individual basis – for example, to give feedback on a piece of work – use parents’ or carers’ email addresses or phone numbers, when it is safe to do so.
- Make sure any phone calls are made from a blocked number if this is a personal phone number.
- Talk to children regularly about the benefits and risks of the online world and give them space to ask questions.
- Tell children where they can go if they are worried about anything or need to talk to someone while they are not attending MU Foundation Sessions.

ChildLine can be contacted for free on 0800 1111

# Appendix 4: Additional Safeguarding Categories of Abuse (1 of 3)

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 for.

## Child sexual exploitation (CSE)

The Department for Education defined CSE in 2017 as a form of sexual abuse, it occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. Children and young people, who are being sexually exploited, or may be at risk of this, can come to the attention of any practitioner in any agency.

## Criminal exploitation – County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the United Kingdom, using dedicated mobile phone lines or other form of ‘deal line’. They are likely to exploit children or vulnerable adults to move and store the drugs and money, and they will use coercion, intimidation, violence (including sexual violence), and weapons.

## 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 new-born 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.

Section 5B of the 2003 Act introduces mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. This duty came into force on 31 October 2015 and to that end the club has adopted this stance for all staff working with children and adults at risk.

## Forced marriage

A forced marriage is when 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.

A 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 coordinated 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 4: Additional Safeguarding Categories of Abuse (2 of 3)

## Hate crime

A hate crime is any incident or criminal offence that is motivated by hostility or prejudice based upon the victims:

- 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.

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 that may come across victims of honour-based violence needs to be aware of their responsibilities in these situations.



# Appendix 4: Additional Safeguarding Categories of Abuse (3 of 3)

## 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 redirection 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.

## Child-on-Child abuse

- Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.
- We understand the importance of:
  - making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
  - recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
  - challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.
- Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

# Appendix 5: 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

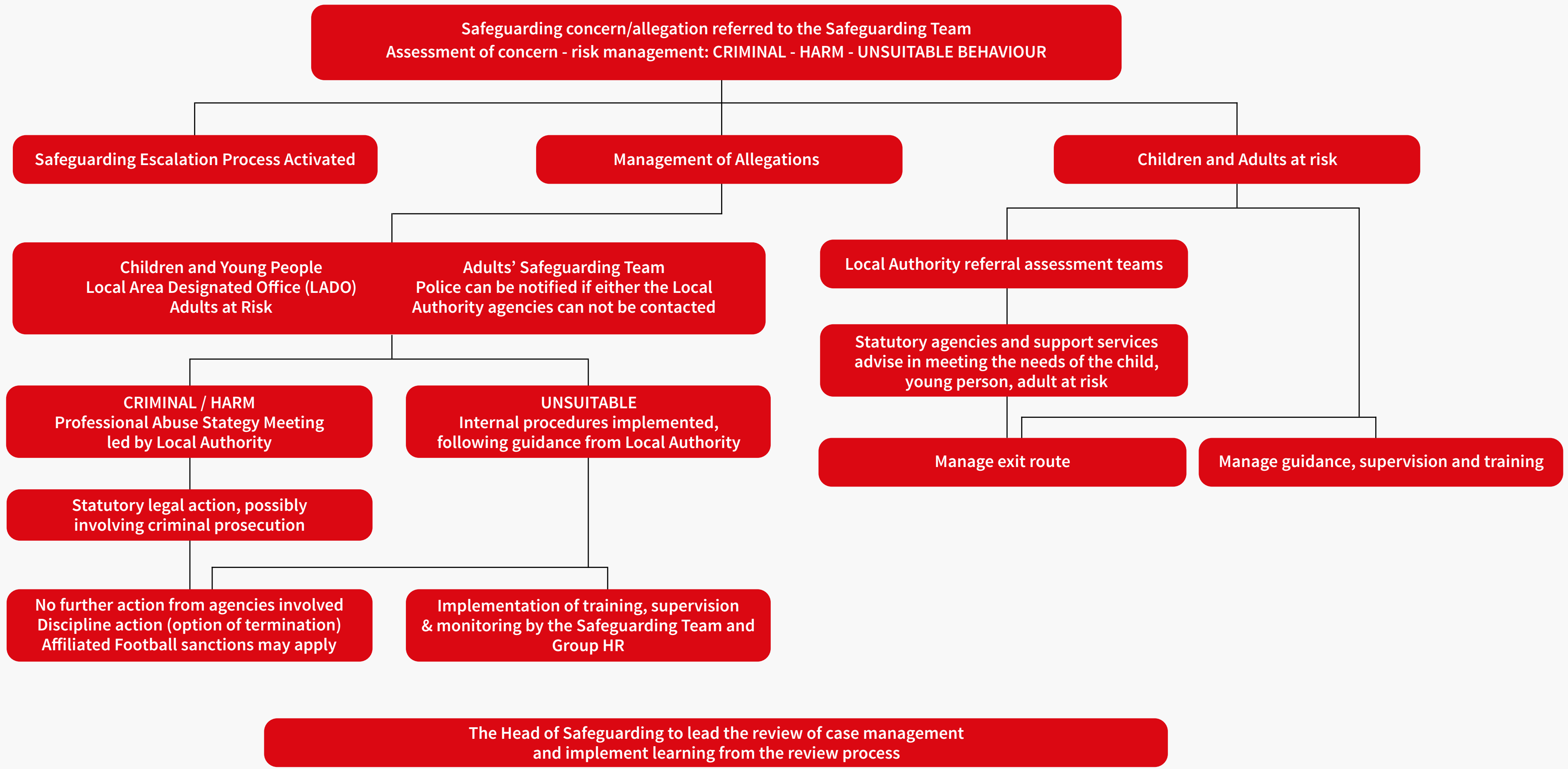
it internally may lead to evidence of malpractice being concealed. The purpose of this policy is to outline how workers may deal with concerns about other workers and/or service provision which may have an impact or threaten the wider public interest.

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 6: Case Management Flow Chart



# Appendix 7: Safeguarding Roles and 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 national legislation, Affiliated Football Regulations, and the Premier League Rules Section S: The Safeguarding of Children and Adults at Risk, and Safer Recruitment.

The Head of Safeguarding will manage the Safeguarding Team and direct the Designated 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.

Designated Safeguarding Officers are situated across Manchester United Foundation to support the embedding of a safeguarding culture. For contact details please email [safeguarding@manutd.co.uk](mailto:safeguarding@manutd.co.uk) or alternative please refer to The Tunnel (Intranet) Safeguarding page or your induction for further details.

# Appendix 8: Internal Safeguarding Contact Details

## Manchester United’s Safeguarding Team

### Head of Safeguarding

Jo Madyarchyk  
Mobile: 07780 956 098  
Email: joanna.madyarchyk@manutd.co.uk

### Safeguarding Advisors

Elise Noblet  
Mobile: 07900 703 951  
Email: elise.noblet@manutd.co.uk

Charlotte Oprey  
Mobile: 07721423135  
Email: charlotte.oprey@mufoundation.org

### MUFC General Enquires

Central: 0161 676 7770  
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  
Mobile: 07881 356 741  
Email: gill.rouch@mufoundation.org

### Head of Communications

Rebecca Newton  
Mobile: 07747 475 794  
Email: rebecca.newton@mufoundation.org

### Operations Director

Matt Johnson  
Mobile: 0776 657 5407  
Email: matt.johnson@mufoundation.org

# Appendix 9: External Safeguarding Contact Details (1 of 3)



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



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



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



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



0845 210 8080  
The National Governing Body



safeguarding@premierleague.com  
The affiliated league responsible for governance of safeguarding

**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 1111

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

**Modern Slavery Helpline**  
08000121700

# Appendix 9: External Safeguarding Contact Details (2 of 3)

## Children & Young People - Local Authorities

### Bolton

Office Hours:  
North: 01204 337 408 / 331 505  
South: 01204 337 729 / 337 730  
West: 01942 634 625  
  
Out of Hours:  
01204 337 7777

### Bury

Office Hours:  
0161 253 5678  
  
Out of Hours:  
0161 253 6606

### Manchester MASH (Multi Agency Safeguarding Hub)

Office Hours:  
0161 219 2843  
  
Out of Hours:  
0161 234 5001 (24 hrs)

### Oldham

Office Hours:  
Under 16s: 0161 770 3790 / 3791  
16 and over: 0161 770 6599 / 6598  
  
Out of Hours:  
0161 770 6936

### Rochdale

Office Hours:  
0300 303 0440  
  
Out of Hours:  
0300 303 8875

### Salford RIAT (Referral & Initial Assessment Team)

Office Hours:  
0161 603 4500  
  
Out of Hours:  
0161 794 8888

### Stockport

Office Hours:  
0161 217 6028  
  
Out of Hours:  
0161 718 2118

### Tameside

Office Hours:  
0161 342 4101  
  
Out of Hours:  
0161 912 2020

### Trafford MBC - First Response

Office Hours:  
0161 912 5125  
  
Out of Hours:  
0161 912 2020

### Wigan

Office Hours:  
01942 828 300  
  
Out of Hours:  
01942 828 777

# Appendix 9: External Safeguarding Contact Details (3 of 3)

## Adults at risk - Local Authorities

### 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  
0161 234 5001 (24 hrs)

### Oldham

Office Hours:  
0161 770 1515  
Out of Hours:  
0161 770 6936

### Rochdale

Office Hours:  
0300 303 8886  
Out of Hours:  
0300 303 8875

### Salford

Office Hours:  
0161 212 4323  
Out of Hours:  
0161 794 8888

### Stockport

Office Hours:  
0161 217 6029  
Out of Hours:  
0161 718 2118

### Tameside

Office Hours:  
0161 342 2400  
Out of Hours:  
0161 912 2020

Trafford TARGet (Trafford  
Adults at Risk Group)  
[www.myway.trafford.gov](http://www.myway.trafford.gov)

Office Hours:  
0161 912 5127  
Out of Hours:  
0161 912 2020

### Wigan

Office Hours:  
01942 828777  
Out of Hours:  
01942 828 777



# Appendix 10: 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 Engagement Policy: Prohibited Items

Transportation Policy

Lone Working & Safe Visiting Policy

## Group Human Resources

Codes of ethics and conduct/behaviour

Disciplinary procedures

Equality and promoting diversity

Recruitment and selection of colleagues

Young Workers Policy

## Health and Safety

Health and Safety Policy

Young Workers Policy – risk assessments

## Safeguarding Team

Crisis Management Guidance for Safeguarding

Management of Criminal Records Policy and Procedures

Supporting guidance on recruitment and selection of colleagues in positions of trust

United Images of Children – on and off the pitch

## Stadium Security

Match day safeguarding operations

## 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

# Appendix 11: Safeguarding Privacy Policy (1 of 3)

## Overview

Manchester United Football Club Limited’s Safeguarding Team processes information about players, participants, parents/carers, staff/volunteers and others within Manchester United Group (hereafter ‘MU’) in order to safeguard its participants and ensure the welfare of both children and adults at risk. This involves both proactive checks, such as carrying out Disclosure and Barring Service (‘DBS’) checks with its partner GB Group on roles which interact with children and adults at risk, and reactive work in dealing with safeguarding matters that are escalated to it in accordance with national legislation and Affiliated Football Regulatory requirements.

The information processed can involve sensitive and criminal records data – particularly where a criminal records check discloses relevant criminal convictions, or where the sensitive data of an alleged perpetrator or victim is relevant to a safeguarding enquiry. This is processed on the basis of preventing and detecting unlawful activity, and for the purposes of safeguarding individuals at risk.

Information may be obtained both directly from children and adults at risk, and from third parties. Such third parties include the DBS, Charity Commission, other football stakeholders such as the Premier League, The FA, or clubs, and other participants or third parties that raise potential issues of abuse. This can include other sports governing bodies, charities such as the NSPCC, Childline or other statutory bodies or agencies such as the police or local authorities.

Data is shared, where appropriate, with other stakeholders who may come into contact with or have a role in dealing with participants who pose a risk of harm to children or adults at risk in football or other environments, such as Local Authorities, the police, DBS, Charity Commission, Affiliated Football and others sports governing bodies. Our privacy policy sets out more details of your data protection rights, including your right to object to certain processing.

## What does this policy cover?

This policy describes how MU will make use of your data when you engage with MU – whether as a child, adult at risk, their parent or carers or as someone who interacts with such individuals – in order to carry out its Safeguarding and Welfare functions.

## What information is collected from you?

MU collects information you provide as part of your engagement with MU whether through employment, participation or attendance at MU activities.

## What information is provided by third parties about you?

In addition to the various third parties described in the ‘Overview’ section above, information may also be obtained from third parties where they make reports about alleged behaviour of concern or harm that involves an individual (either as an alleged victim or alleged perpetrator or witness). This can arrive from a wide range of third parties. We may retain details of allegations as intelligence, even if we decide that further action is not warranted in the circumstances.

# Appendix 11: Safeguarding Privacy Policy (2 of 3)

## How does MU use this information, and what is the legal basis for this use?

MU will use this information for the following purposes:

- As required to conduct its business and pursue its legitimate interests, in particular:
  - Communicating with you or about you where necessary to implement MU Safeguarding Children and Adults at Risk Policies, Affiliated Football Safeguarding Policies, and relevant regulations in place to ensure the welfare of individuals at risk
  - Administering its systems holding safeguarding data
  - Collecting, sharing and retaining evidence and intelligence in relation to safeguarding and enforcing applicable legislation and regulations regarding safeguarding and welfare to prevent and detect unlawful activity and where necessary to protect children and adults at risk from abuse
- For purposes which are required by law:
  - In response to requests by government or law enforcement authorities conducting an investigation

## How is data shared, where and when?

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the parties’ legal or legitimate interests in compliance with applicable laws. Personal data will also be shared with third party service providers, who will process it on behalf of the controllers for the purposes identified above.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor’s Processor Binding Corporate Rules.

# Appendix 11: Safeguarding Privacy Policy (3 of 3)

## What rights do individuals have?

Individuals have the right to ask MU for a copy of their personal data, to correct, delete or restrict (stop any active) processing of their personal data, and to obtain the personal data they provide to us for a contract or with your consent in a structured, machine readable format.

In addition, an individual can object to the processing of their personal data in some circumstances (in particular, where one of the data controllers doesn’t have to process the data to meet a contractual or other legal requirement, or where it is using the data for direct marketing).

Please note that these rights may be limited, for example if fulfilling their request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights) or if the individual asks us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform the individual of relevant exemptions we rely upon when responding to any request that is made.

Information that is required to be provided in order to carry out a DBS check so that an individual can take up a relevant role is mandatory. If relevant data is not provided, an individual cannot be registered in certain roles. Other information provided is optional, although where an individual is asked to provide information and refuse to do so, where relevant to an investigation into a safeguarding matter, this may have consequences in relation to relevant enforcement action that will be explained at the time of the investigation.

## How do I get in touch with the data protection officer?

You can contact the MU Group Data Protection Officer by sending an email to [privacy@manutd.co.uk](mailto:privacy@manutd.co.uk).

## How long will you retain my data?

MU retains information relating to safeguarding matters for as long as the information may have relevance for current or historic relevance. In view of the potential need to investigate historic issues, such data may be retained indefinitely.

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Safeguarding Children and Adults at Risk Policy & Procedures

**Author:** Joanna Madyarchyk – Safeguarding Team

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