



SALE SHARKS

Club Safeguarding of Adults at Risk Policy

This policy refers and applies to persons over 18 years of age.

Updated August 2024 Carol Baker - Head of Safeguarding - Designated Safeguarding Lead –(DSL)

This policy works in collaboration with England Rugby’s Adults at Risk Policy

<https://www.englandrugby.com//dxdam/84/8489374f-eeb5-4d09-a5da-24ce07c93c8f/RFU%20Safeguarding%20Adults%20in%20Rugby%20Union%20Policy%20and%20Procedures.pdf>

1	<p>Introduction to the Policy</p> <p>Sale Sharks recognises and accepts its responsibility for the safety and well-being of Adults at Risk who come within the care of the organisation and its staffing.</p> <p>Our aim is to create a safe, secure environment for all, and systems have been put in place to prevent or minimise the risk of abuse occurring within the organisation, for appropriate action and reporting to be taken when staff are made aware of abuse taking place.</p> <p>One of the important differences between safeguarding adults and children; is the adult’s right to self-determination. Hence why a separate policy has been written for adults at risk.</p> <p>Adults may choose not to act to protect themselves and it is only in certain circumstances the law intervenes. This is usually when an adult is assessed to lack capacity to self-protect.</p> <p>THERE are DIFFERENT LAWS and REGUALTIONS IN RELATION TO SAFEGUARDING ADULTS. (compared to children).</p> <p>Ann Craft Trust provides further support and guidance https://www.anncrafttrust.org/resources/safeguarding-adults-legislation/</p> <p>Laws that are used and considered when protecting Adults at Risk are: -</p> <ul style="list-style-type: none">Care Act 2014Sexual Offences act 2003Mental Capacity Act 2005. (Including Deprivation of Liberty Safeguards)Domestic Violence Crime and Victims Act 2004Safeguarding Vulnerable Persons Group Act 2006
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	<p>The Sale Sharks and RFU are committed to creating and maintaining a safe and positive environment for everyone to play and enjoy rugby union. Safeguarding the welfare of all adults involved in all aspects of the game, particularly those deemed to be at risk.</p> <p>The policy below applies to all persons over the age of 18 involved in rugby and associated circumstances.</p> <ul style="list-style-type: none"> RFU Safeguarding Adults at Risk in Rugby Union Policy and Procedures can be found in full using the link. <p>https://www.englandrugby.com/governance/safeguarding/safeguarding-adults</p> <p>The purpose of the policy:</p> <ul style="list-style-type: none"> To provide protection for Adults at Risk who interact with Sale Sharks and their associated departments To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect somebody may be experiencing, or be at risk of, harm. This is a whole club policy encompassing all departments including commercial, foundation and academies. This is not exhaustive and will be supported by departmental specific policies based around needs assessments. <p>We recognise that:</p> <ul style="list-style-type: none"> Every person should have the right to live a life free from abuse, regardless of age, disability, gender, race, religious belief, sexual orientation or identity and everyone has the right to equal protection from all types of harm or abuse Working in partnership with Adults at Risk and their support networks where required, is essential in promoting and embedding this policy.
	<p>We will seek to safeguard Adults at Risk by:</p>
	<ul style="list-style-type: none"> Valuing them, listening, and respecting them Adopting safeguarding guidelines and best practice throughout procedures and a code of conduct for all staff and volunteers Recruiting staff and volunteers safely, ensuring all necessary checks, qualifications training and protocols are achieved. Sharing information about safeguarding and child protection and best practice. Sharing in a confidential manner concerns and information with appropriate agencies. Provide effective management for staff and volunteers through supervision, training, and support

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	<p>There are three main elements to our policy:</p> <ul style="list-style-type: none"> i. Preventing unsuitable people working with Adults at Risk and ensuring that staff are appropriately trained and qualified. ii. Supporting Adults at Risk or those who may have been abused or witnessed violence towards others. iii. Procedures for identifying and reporting cases, or suspected cases, of abuse. The definitions of the categories of abuse are attached (see Appendix A) and outlined within the RFU policy https://www.englandrugby.com/governance/safeguarding/safeguarding-adults
	<p>Adults at Risk are defined for the purpose of this document as</p> <p>An adult at risk (previously referred to as a vulnerable adult; is now inappropriate terminology). Persons over 18 years of age.</p> <p>The ‘adults’ referred to in this document are adults at risk using the definition from the Safeguarding Adults in Sport Steering Group (2013):</p> <p><i>‘When we are speaking about adults at risk, we are referring to those who have health or social care needs (irrespective of whether or not those needs are being met by social services) and who are unable to safeguard themselves as a result.</i></p> <p><i>While we recognise that some people will be vulnerable due to their learning disability or mental health needs, there are also those adults who are at risk due to a specific circumstance they may find themselves in, for example: financial abuse, domestic abuse; forced marriage; and sexual or commercial exploitation (this is not an exhaustive list).</i></p> <p>Abuse is a violation of an individual’s human and civil rights by another person or persons.</p> <p>At risk is a term meaning that someone may be more vulnerable to abuse than someone else. For example, an adult with a learning disability may well be more at risk of financial abuse as they may struggle with managing their finances, this could leave them at risk from an unscrupulous person.</p> <p>Capacity refers to the ability to make a decision, sometimes at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision, unless it can be established that they lack capacity.</p> <p>Our policy applies to all staff, paid and unpaid, working on behalf of Sale Sharks and all its departments and is reviewed annually.</p>
2	<p>Recruitment and Employment</p> <p>The aim of this section of the policy is to ensure suitable persons working with Adults at Risk and that staff are appropriately trained and confident in dealing with safeguarding issues.</p>
2.1	<p>Recruitment</p> <p>No individual will be recruited on a paid or voluntary basis into a ‘Position of Trust’ * (PIPOT) without satisfactory clearance from the Disclosure and Barring Service (DBS). Nor without the necessary qualifications for the role in which they have been appointed.</p>



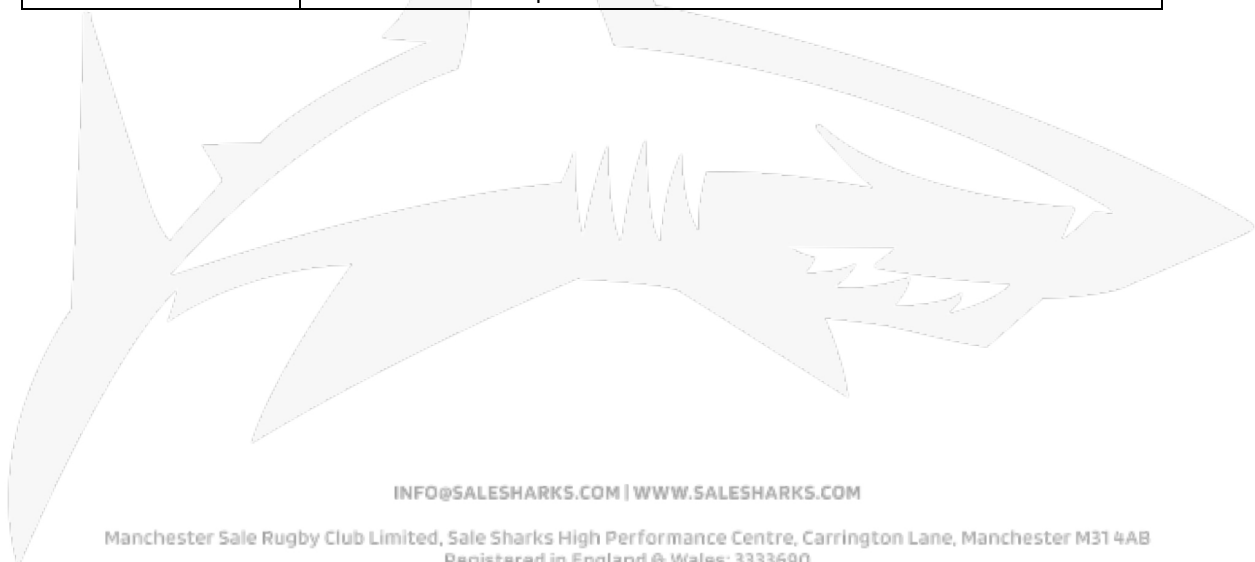
	<p>Sale Sharks, through the RFU, will ensure appropriate checks are completed. Records of all staff/volunteers' DBS numbers will be recorded against their GMS (game management system) entries.</p> <p>No applicant, conditionally offered a position of trust with the Sale Sharks, should start work with Adults at Risk without constant supervision before a satisfactory clearance has been received.</p> <p>An individual applying for a post which involves contact with an Adult at Risk must attend the necessary safeguarding training provided by England Rugby RFU, either "Play it Safe" and or "In touch" (or equivalent from alternate provider with accreditation) in line with their professional development. Candidates must complete both an interview and coaching audit, in-line with the Sale Sharks recruitment process.</p> <p>Appropriate renewals of an individual's history and safeguard training will be completed in line with guidance issued by the RFU. (Maximum of three years before renewal required).</p> <p>*Position. Of Trust ...A Person in a Position of Trust (PIPOT) is anyone who works or volunteers with adults with care and support needs. The PIPOT person, is in a position to exercise authority, power or control over adult(s) with care and support needs (as perceived by the adult).</p>
2.2	<p>Understanding roles and responsibilities</p> <p>All staff, paid and unpaid, working on behalf of the Sale Sharks must recognise their duty around safeguarding (both for Children and Adults at Risk). They should also feel confident to raise concerns about poor or unsafe practice in regard to such persons and that such concerns are addressed recorded investigated sensitively and effectively in a timely manner in accordance with agreed whistle- blowing policies.</p> <p>https://www.englandrugby.com/governance/safeguarding/safeguarding-adults</p> <p>These whistleblowing incidents are reported via England Rugby Speak Up Policy.</p> <p>https://www.englandrugby.com/about-rfu/rfu-policies/speak-up-policy</p> <p>Reporting Form WhistleBlowing</p> <p>https://app.smartsheet.com/b/form/93ac467327c941298565409a1840d811</p> <p>All staff will work and volunteer in accordance with England Rugby Regulation 21 (Safeguarding)</p> <p>https://www.englandrugby.com//dxdam/79/79216a18-4ef0-436a-8a24-6d72adb613b6/RFU%20Regulation%2021.pdf</p>
2.3	<p>Safeguarding Training</p>
	<p>Sale Sharks will provide safeguarding training for all staff, paid and unpaid from the point of their induction which is updated regularly, every three years at a maximum, so that they are confident about:</p>



	<p>Sale Sharks legislative responsibilities Their personal responsibilities The Sale Sharks policies and procedures</p> <p>The need to be alert to the signs and indicators of possible abuse, including abuse of Adults at Risk (including possible child sexual exploitation- CSE) radicalisation, and mental health. Staff will be supported and trained to feel confident about</p> <ul style="list-style-type: none"> The need to record concerns How to support and respond to an Adult at Risk who makes a disclosure of abuse How to report and respond to a 3rd party who makes a disclosure of abuse Sale Sharks will, if required support staff who have been affected by such reports.
<p>3.</p>	<p>Procedures for reporting cases (or suspected cases) of abuse</p>
<p>3.1</p>	<p>Designated Safeguarding Lead Head of Sale Sharks Safeguarding Carol Baker Mobile Number 07786 367631 or carol.baker@salesharks.com</p> <p>Designated email address for reporting (if preferred) safeguardingreporting@salesharks.com</p> <p>Sale Sharks will ensure there is a designated safeguarding lead, Head of Safeguarding for the whole club and departments, who has lead responsibility for safeguarding Adults at Risk (and Children) who will have undertaken, as a minimum, RFU Child/Club Safeguarding Officer Training, which has an element of training relating to Adults at Risk. Also, persons, will have undertaken RFU “In-touch” course and has appropriate experience relative to the role.</p> <p>Arrangements will be put in place to deal with an incident if the designated senior member of staff is not available. This will include nominating at least one other member of the senior staff team with responsibility for overseeing the safeguarding policy.</p> <p>The Senior Management of Sale Sharks have recognised the importance of the role of the designated person(s) and will ensure they have the time, training and support necessary to undertake their duties.</p> <p>Sale Sharks will ensure every member of staff, paid and unpaid knows who the designated member of staff are and the procedures for passing on concerns. This will be communicated to each staff member as part of the induction process and will ensure every member of staff is aware:</p> <ul style="list-style-type: none"> • the name of the designated person(s) and their role • how to identify the signs of abuse and neglect • how to pass on and record concerns about an Adult at Risk



	<ul style="list-style-type: none"> • that they have an individual responsibility to be alert to the signs and indicators of abuse and for referring safeguarding concerns to the Designated Person/s • that they have a responsibility to provide a safe environment for Adult at Risk. <p>Chain of reporting and key personnel...follows</p> <p>Sale Sharks also abide by England Rugby / RFU Codes of Conduct https://www.englandrugby.com/participation/running-your-club/code-of-conduct</p> <p>Whistleblowing Policy; “Speak Up” Policy https://www.englandrugby.com/about-rfu/rfu-policies/speak-up-policy</p>
	<p>The Sale Sharks Safeguarding Lead will be clear about the Sale Sharks responsibilities when delivering activities.</p> <p>This involves:</p> <ul style="list-style-type: none"> • All policies and procedures are up to date with current legislation and guidance • Ensure all staff and volunteers are up to date with safeguarding training appropriate to their role and level of management or leadership. • Ensure all staff and volunteers have up to date DBS clearances in line with their role • Ensure all staff and volunteers are aware of Sale Sharks policies and procedures in relation to Safeguarding
	<p>Promote and Support by:</p> <ol style="list-style-type: none"> a. knowing local authority safeguarding staff and procedures b. Ensure that the policies are working in practice, such as Anti-Bullying Policy and Inclusion and Equality. c. Manage appropriately incidents of poor behaviour in line with the Sale Sharks and RFU Policy and liaising with The RFU Safeguarding Officer. d. Ensure that all those working with vulnerable groups are appropriately supervised, trained, and have had the appropriate checks completed.



<p>3.2</p>	<p>Risk Management</p> <p>All activities involving vulnerable groups must be risk assessed by the Sale Sharks, which may at times involve discussion with additional service providers. However, it is important that staff and volunteers ask the following questions:</p> <p>What is the activity? Which age groups are involved? What requirements are needed if working with Adults at Risk? What is the environment like where the activity is taking place? Are there any special needs, disability or other circumstances that need to be considered? Are the groups mixed in age, ability, and gender? What experiences and qualifications do the organisers/staff possess?</p>
<p>3.3</p>	<p>Responding to allegations or suspicions against a member of staff</p> <p>Any allegation of abuse made against a member of staff will be reported asap to Sale Sharks Safeguarding Lead. In cases or the event of the DSL Safeguarding Officer being subject of an allegation, it must be reported to another designated staff member, Senior Management Team or RFU Safeguarding Department in Twickenham.</p> <p>If there is an allegation (or a suspicion) of abuse against a member of staff a decision about whether to suspend the person on full pay will be decided by the Senior Management Team in line with the disciplinary procedure. In consultation with the RFU. Sale Sharks will assess all cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This will be dependent on the outcome of any investigation or criminal investigation and Sale Sharks will ensure that it does not breach the Safeguarding Vulnerable Groups Act 2006 by reinstating a person who is on the barred list.</p>
	<p>Additionally, this should fall in-line with RFU Regulations 21 which can be found using:</p> <p>https://www.englandrugby.com/governance/safeguarding</p> <p>Once the RFU have assumed management of a case the Sale Sharks should take no further action until advised by the RFU. Safeguarding investigations are handled by the RFU Safeguarding team, who will assess the risk that individuals pose to Adults at Risk, give guidance possible reporting to statutory agencies and sanctions if required.</p>
	<p>Where there is a complaint against a member of staff there can be three types of investigation:</p> <ul style="list-style-type: none"> • A criminal investigation led by the Police • An investigation led in a multi-agency approach by the Local Authority (LADO) and Social Services



	<ul style="list-style-type: none"> • A disciplinary or misconduct investigation led by Sale Sharks which may involve the RFU
	<p>The results of the Police and Local Authority investigation may well influence the disciplinary investigation.</p> <p>All allegations of poor practice will be investigated by the Designated Safeguarding Lead Officer and / or Senior Management Team.</p> <p>Concerns about suspected abuse:</p> <ul style="list-style-type: none"> • Any suspicion that an Adult at Risk has been abused by either a member of staff or a volunteer should be reported to the Safeguarding Lead who will take such steps as considered necessary to ensure the safety of the individual in question and any other person who may be at risk. • The allegation may be referred to statutory agencies and RFU. • Following advice from statutory agencies and RFU, those who need to be notified will be contacted. • If the DSL Safeguarding Officer is the subject of an allegation, the report must be made to an additional safeguarding officer or the RFU safeguarding manager safeguarding@rfu.com <p>Every effort should be made to ensure that confidentiality is maintained for all concerned.</p> <p>Information should be handled and disseminated on a need-to-know basis only. This includes:</p> <ul style="list-style-type: none"> • The DSL -Safeguarding Officer and Senior Management representative. • The carer of the person who is alleged to have been abused, if applicable. • The person making the allegation. • Local Authority and Police if required in serious cases. • Dependent on role, the National Governing Body. <p>Information will be stored in line with the Data Protection Act 1998.</p> <p>No contact should be made with the alleged abuser, particularly if this is another Adult at Risk or the carer of the alleged victim.</p> <p>The DSL Safeguarding Officer will ensure that any disciplinary proceedings against staff relating to safeguarding will be concluded in full, even when the member of staff is no longer employed by Sale Sharks and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable. Also supplied to DSB service.</p> <p>Local Authorities Designated Officer (LADO) will be liaised with to collate information relative to safeguarding and protection.</p> <p>Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress.</p>

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	<p>Consideration must be given to the needs of the adult and a recognition that an Adult at Risk, may make an allegation against an innocent party because they are too afraid to name the real perpetrator or may make a malicious accusation. On occasions Adults at Risk may and can make false or malicious allegations. Misunderstandings and misinterpretations of events do happen and must be considered.</p> <p>Sale Sharks will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with participants. As part of the induction process (and as part of Premiership Rugby's Minimum Standards Training), all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world).</p> <p>All staff paid and unpaid must recognise they are in a position of trust. A position of trust is a legal term that refers to a position of authority over another person or within an organization. Guidelines and Policies are written and are intended to guard against situations where a person takes advantage of their position of authority with inappropriate behaviour.</p> <p>Position of trust is defined as: means a person in a position of authority over another person as defined by CHILD PROTECTION IN SPORT UNIT https://thecpsu.org.uk/resource-library/best-practice/abuse-of-positions-of-trust-within-sport/</p>
	<p>Outcome of a concern may result in one of the following actions:</p> <ul style="list-style-type: none"> • Criminal proceedings resulting in loss of employment • Suspension and/or disciplinary action by The RFU and/or Sale Sharks • Further training, supervision & mentoring by The RFU and/or Sale Sharks
3.4	<p>Responding to a referral or disclosure</p> <p>It is not the responsibility of anyone within Sale Sharks to decide whether or not abuse has taken place.</p> <p>However, there is a responsibility to act on any concerns. Sale Sharks will assure all staff and volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague or another is, or may be, abusing an Adult at Risk.</p>
3.5	<p>Disclosures</p> <p>If an Adult at Risk informs you directly that they are concerned about someone's behaviour towards them, this is known as a disclosure. The following action should be taken:</p> <ol style="list-style-type: none"> a. React calmly so as not to frighten the person. b. Inform the Adult at Risk or that he or she is not to blame and that he or she was correct to make the disclosure. c. Take what the Adult at Risk says seriously. d. If medical treatment is needed, take Adult at Risk to hospital or telephone for an ambulance – inform the

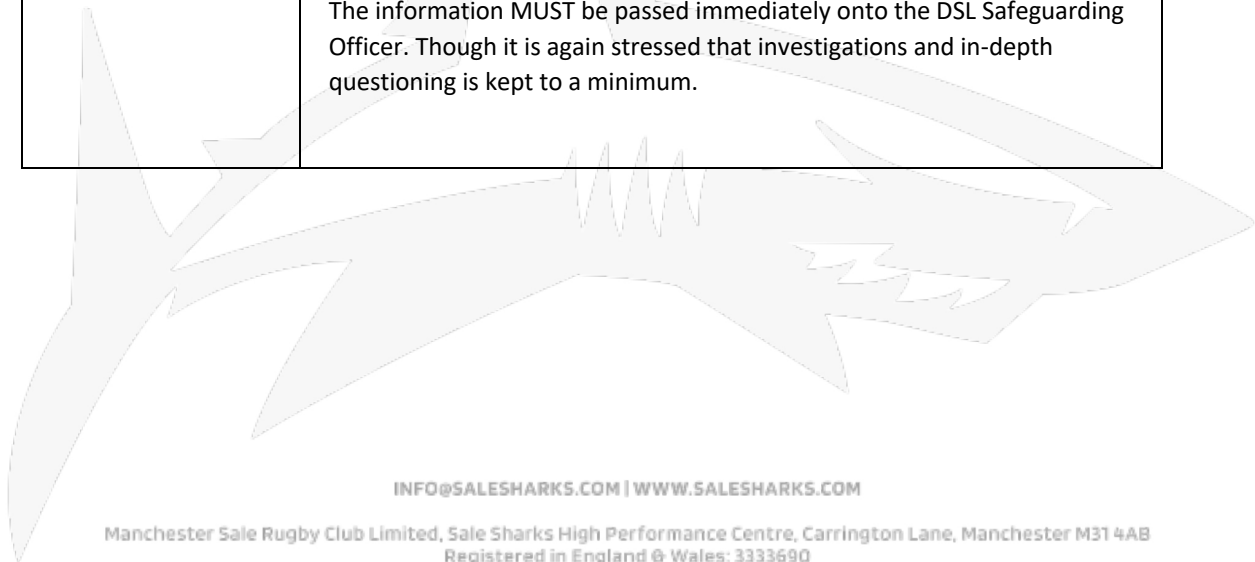


	<p>medical staff that there are concerns of a safeguarding nature</p> <ul style="list-style-type: none"> e. Avoid leading the Adult at Risk in discussion and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said f. Re-assure the person, but do not make promises of confidentiality or outcome g. Make notes contemporaneously (as soon as is practicable). Recording what was said, where the conversation took place. Times dates, any other person present. Use only the words that the victim says. Do not interpret their words and replace with words you interpret or think they mean.
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<p>3.6</p>	<p style="text-align: center;">Process of Dealing with Allegations at the Sale Sharks</p> <p>If an Adult at Risk discloses information to you, or you have witnessed; or have had information reported to you; an incident or complaint, which may be considered abuse or poor practice.</p> <p>1 Stay Calm, take a breath to gather your thoughts</p> <p>2 Reassure the Person you are there to support and help.</p> <p>3 “DON’T TELL ANYONE” - make no promises in relation to confidentially and not reporting to necessary departments / agencies.</p> <p>4 Ask as FEW QUESTIONS as possible but enough to secure relevant information</p> <p><u>FOLLOW THIS GUIDE</u></p> <ul style="list-style-type: none"> A. Is the victim in need of urgent medical treatment? B. Is the matter serious enough to potentially be considered a criminal offence? C. If Yes Contact emergency services; inform of potential safeguarding issue. D. Is the Designated Sale Sharks Safeguarding Officer available? Inform them, or if unavailable contact RFU Safeguarding Team E. Does the allegation or incident involve the child’s parent(s) guardian(s) or carer(s)? F. If appropriate Inform parents, guardians, or carers at earliest opportunity. G. Report to local social care services and/or police and RFU Safeguarding Team at earliest opportunity and await further instruction from them.
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	<p>All information MUST be reported to Sale Sharks on an Incident Reporting form (RFU Incident reporting form). This must be submitted at the earliest opportunity.</p> <p>Prior to this a phone call or email, to DSL is strongly recommended. DSL Carol Baker 07786367631 safeguardingreporting@salesharks.com</p> <p>Guidance https://www.englandrugby.com/governance/safeguarding/sharing-concerns</p> <p>Reporting form https://www.englandrugby.com//dxdam/0c/0c2408f3-1164-423c-80b1-96092ffb9968/Safeguarding%20Referral%20Form.pdf</p>
3.7	<p>Keeping Records</p> <p>To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, using the Referral Form</p> <ul style="list-style-type: none"> • The Adult at Risk’s name, age, and date of birth. • The Adult at Risk’s home address and telephone number. • Whether or not the person making the report is expressing their own concerns or those of a third-party disclosure or hearsay. • The nature of the allegation. Include dates, times, any special factors, and other relevant information. - Make a clear distinction between what is fact, opinion, or hearsay. • A description of any visible bruising or other injuries. Also, any indirect signs, such as behavioral changes. Details of witnesses to the incidents. • The Adult at Risk’s account, if it can be given, of what has happened and how any bruising or other injuries occurred. Whether or not explanations are well rehearsed. • Have the parent/carer been contacted? - If so, what has been said? • Has anyone else been consulted? If so, record details. • If the Adult at Risk was not the person who reported the incident, has this person been spoken to? If so, what was said? • Has anyone been named as the alleged abuser? Record details. <p>The information MUST be passed immediately onto the DSL Safeguarding Officer. Though it is again stressed that investigations and in-depth questioning is kept to a minimum.</p>



	<p>Preserving Evidence</p> <ul style="list-style-type: none"> • The first concern should be the safety and welfare of the abused person. However, your efforts to preserve evidence may be vital. In all cases the preservation of evidence is crucial especially if the police investigation is to be effective. What you do or do not do in the time whilst you are waiting for the police to arrive may make all the difference. • Here are some useful guidelines: • In physical abuse cases, where an individual wishes to show you an injury, only observe what they consent to show you and what is appropriate. • Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibers, blood etc. • If you do have to handle anything at the scene keep this to a minimum • Do not touch any weapons unless they are handed directly to you. If this happens, keep handling to a minimum. Place the items/weapons in a clean dry place to hand to the police • Preserve anything that was used to comfort the abused person, for example a blanket. • Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused person and/or the alleged perpetrator, until the police arrive • Ensure that no one has physical contact with both the abused person and the alleged perpetrator as cross-contamination can destroy evidence. • Encourage the victim not to shower especially in cases of sexual and physical assault. • Encourage the victim not to change clothing • Even when the victim says they do not want police involvement, preserve items anyway as they may change their mind later or you may be legally obliged to inform the police. • Encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth. • Do not handle items or the victim unless necessary. If there are latex gloves or protective clothing available, use them
	<p>It is essential that, whatever the nature of the suspected abuse, the Adult at Risk is separated from the person who is or is thought to be the abuser. It is important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. However, if it is not possible, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority.</p> <p>Sometimes a victim needs to be moved to a place of safety – i.e., Hospital/police station or even fire station. In some cases, a different location within the facility</p>



	<p>Sale Sharks acknowledge that at times malicious allegation are made against individuals and impartial investigation/enquires working in collaboration with the RFU safeguarding team will reveal a suitable outcome. This must be born in mind when speaking to and dealing with “alleged perpetrators”.</p>
<p>3.9</p>	<p>Record Keeping</p> <p>The Sale Sharks will:</p> <ul style="list-style-type: none"> • Keep clear, detailed, accurate, written records of concerns about Adults at Risk (noting the date, event and action taken). • Ensure all records are kept securely, usually electronically and password protected. <p>All information will be stored and handled in line with the Data Protection Act 1998 principles. The Data Protection Act does not prevent the designated senior staff members from sharing information with relevant agencies, where that information may help to protect an Adult at Risk.</p> <p>Sale Sharks will also work in-line with the RFU GDPR toolkit: https://www.englandrugby.com/participation/running-your-club/legal-and-administration/data-protection</p>
<p>4</p>	<p>Supporting Adults at Risk who may have been abused</p> <p>Adults at Risk may be subjected to abuse in the form of neglect, physical, emotional, or psychological; financial, discriminatory, institutional abuse, discrimination, exploitation, sexual abuse, or sexual mistreatment; or lack of care that leads to injury or harm.</p> <p>It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust.</p> <p>Abuse can happen regardless of their age, gender, race, ability, culture, or sexual orientation.</p> <p>Poor practice is unacceptable and will be treated seriously with appropriate action.</p> <p>Any behaviour that contravenes existing Codes of Conduct infringes an individual’s rights and/or reflects a failure to fulfil the highest standards of care is an indication of poor practice. Those who are deemed vulnerable may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as ‘acceptable’.</p> <p>It is important that all staff are aware of the different forms of abuse and the different signs that may indicate that an Adult at Risk is the victim of abuse.</p>
	<p>Abuse can also be under the grounds of discrimination, which is the treatment of one particular group of people less favourably than others because of their race, colour, nationality, or ethnic or national origin. The law in Britain recognises two kinds of discrimination: direct and indirect.</p> <p><u>Direct discrimination</u> occurs when for example race, colour, nationality, or ethnic or national origin is used as an explicit reason for discriminating.</p>



	<p><u>Indirect discrimination</u> occurs when for example there are rules, regulations or procedures operating, which have the effect of discriminating against certain groups of people.</p> <p><u>Positive discrimination</u> occurs when for example favoring of individuals belonging to groups which suffer discrimination.</p>
5	<p>Other related policies</p>
	<p>Sale Sharks also has in place several other policies which are also important to keep in mind as part of safeguarding:</p>
5.1	<p><u>Whistleblowing Policy</u></p> <p>All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. Sale Sharks 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 Sale Sharks believes it can help prevent malpractice - prevention is better than cure. That is one of the aims of this policy.</p> <p>Employees have a right and duty to raise matters of concern they may have about the services being offered by the Sale Sharks or serious malpractice associated with them. Employees 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.</p> <p>By knowing about malpractice at an early-stage Sale Sharks can take 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.</p> <p>This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in Sale Sharks 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 of the Sale Sharks if an issue is not addressed by the Sale Sharks, or it is felt that by raising it internally may lead to evidence of malpractice being concealed.</p> <p>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 the Sale Sharks staff and volunteers.</p>
	<p>https://www.englandrugby.com/about-rfu/rfu-policies/speak-up-policy</p>



5.2	<p><u>Complaints Policy</u></p> <p>All complaints will be dealt with in accordance with the Sale Sharks Complaints Policy. Due consideration will be given to the nature of the complaint and if it contains a safeguarding concern. No complaint can be dealt with if the concern is being dealt with by statutory agencies (police and social services), as this may hinder any legal or care proceedings. Complainants of a safeguarding matter can refer their concerns to either Sale Sharks Safeguarding Designated Safeguarding Lead or the RFU Safeguarding Manager safeguarding@rfu.com</p>
D	<p><u>E-Safety Policy</u></p> <p>Sale Sharks has developed a separate E-Safety Policy. This includes information about use of social media, taking and sharing of photographs and inappropriate internet use etc.</p>
6	<p>Safeguarding responsibilities of the Senior Management Team</p> <p>The Senior Management Team fully recognises its responsibilities with regard to safeguarding. It has appointed:</p> <p style="padding-left: 40px;">A DSL (designated safeguarding lead) responsible for safeguarding and child protection who will monitor Sale Sharks compliance with statutory requirements and practice and champion child protection and Adults at Risk protection issues</p> <p style="padding-left: 40px;">(Though not for the Sale Sharks Foundation) This is a separate entity.</p> <p>Ensure that all Safeguarding Policies are annually reviewed and updated and shared with staff.</p>
7	<p>Working with partners</p> <p>Where services or activities are provided separately by another body, either on or off Sale Sharks property/site, Sale Sharks will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding Adults at Risk and there are arrangements to liaise with the Sale Sharks on these matters where appropriate.</p>

REPORTING

<https://www.englandrugby.com/governance/safeguarding/sharing-concern>

Send the form to safeguarding@rfu.com and inform Sale Sharks Safeguarding lead of this referral. If you wish to discuss the referral in advance of submitting it, please speak to your Safeguarding Lead carol.baker@salesharks.com 07786367631.

Or the RFU Safeguarding Team on 020 8831 7480 or 020 8831 7479

INFO@SALESHARKS.COM | WWW.SALESHARKS.COM



<https://www.englandrugby.com/governance/safeguarding/contact-the-rfu-safeguarding-team>

Guidance on forms of abuse - Adults at Risk

Types of abuse

- **Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and hearing.
- **Sexual Abuse** – this includes rape and sexual assault or sexual acts to which the adult at risk has not consented or could not consent or was pressured into consenting.
- **Physical Abuse** – includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- **Emotional Abuse / Psychological** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Bullying

Bullying is the use of aggression with intention of hurting another person. It results in pain and distress for the victim. It can be difficult to define

- **Financial Abuse** – including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.
- **Institutional Abuse** – this is abuse which centres around routines and schedules which have been designed for the benefit of the institution and not the individual.
- **Discrimination** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender, or disability or any of the Protected Characteristics of the Equality Act 2010. Research tells us that bullying of vulnerable groups can be an issue in sport.
- **Exploitation** – either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.

The following section provides some accompanying information and signs about different forms of abuse that can relate to safeguarding issues. (Both Adults at Risk and Children).

INFO@SALESHARKS.COM | WWW.SALESHARKS.COM

Manchester Sale Rugby Club Limited, Sale Sharks High Performance Centre, Carrington Lane, Manchester M31 4AB
Registered in England & Wales: 3333690



1. Physical Injury

Defined as the actual or likely injury to a person, or the failure to prevent physical injury or suffering to a vulnerable individual. This may include,

- Presence of injuries, cuts, bruises, bites, burns or even broken bones which may have occurred over a period of time.
- Injuries which are in odd places, such as the inside of an arm or leg, behind the ear, the sole of the foot or inside the mouth.
- Injuries that have not received medical attention.
- Medical problems that go unattended such as persistent pressure sores and skin infections.
- Sudden or unexplained urinary or fecal incontinence
- Dehydration, often accompanied by dizziness and disorientation.
- Injuries that are in the shape of objects e.g., a cut or bruise shaped like a buckle or ring, through to an iron scorch.
- Unexplained weight loss which is not being investigated.
- Uncontrolled access to prescription drugs.

A person who is suffering physical abuse is often afraid of the perpetrator. They may flinch when she or he approaches them or complain about not wanting to return to the place where the abuse is occurring.

2. Neglect

Neglect is the persistent failure to meet a person 's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development.

- An Adult at Risk appears malnourished or dehydrated.
- An Adult at Risk has untreated medical problems.
- An Adult at Risk lacks physical aids when they are required by the adult to live normally • An Adult at Risk lives in accommodation which falls below minimum practical standards.
- An Adult at Risk's physical appearance or condition is poor.
- Callers or visitors are refused access to an Adult at Risk.
- An Adult at Risk does not appear to be receiving their prescribed medication.

3. Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, whether or not the individual is aware of what is happening. This again may be difficult to identify, but there are some indicators.

Urinary tract infections or sexually transmitted disease.

- Pain, soreness, itchiness.
- Urinary tract infections or sexually transmitted disease.
- Unusual difficulty in walking or sitting.
- Bruises or tears around the genital area.

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- Reluctance to accept examination.
- Presence of computer or photographic equipment.
- A child discloses fully or partially that sexual abuse is occurring or has occurred in the past.
- A child appears unusually withdrawn or has poor concentration.
- A child exhibits significant change in sexual behaviour or outlook.
- Changes in behaviour e.g., happy to sad, extrovert to introvert.
- Sexual maturity beyond their years, both behaviours and language.

4. Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of an Adult at Risk such as to cause severe and persistent adverse effects on the persons emotional development. It may feature age or developmentally inappropriate expectations being imposed on the Adult at Risk. This form of abuse is more difficult to identify, but here are some signs to be aware of.

- A carer always being present so you cannot see the adult on their own.
- Lack of access to medical care or other appointments such as social services.
- Low self-worth, lack of confidence, worried appearance.
- Increased levels of confusion.
- Toileting problems.
- Disturbed sleep patterns.
- The adult feeling, they are being continually watched.
- Inability to communicate.
- Submissive behaviour when the perpetrator is around.
- Excessive distress, particularly when a visitor is leaving.
- An uncomfortable living environment, such as extreme tidiness or extreme disorder.

5. Bullying

Bullying is the use of aggression with intention of hurting another person. It results in pain and distress for the victim. It can be difficult to define below are some examples.

- A coach adopts a win at all costs philosophy
- An Adult at Risk is regularly intimidated verbal or with threats of violence.
- Emotional e.g., being unfriendly, excluding
- Physical e.g., pushing, kicking, hitting, punching
- Racist e.g., racial taunts, graffiti, gestures
- Sexual e.g., unwanted physical contact
- Homophobic e.g., focusing on the issues of sexuality
- Verbal e.g., name calling, teasing, spreading rumours
- Electronic e.g., emails, texting, comments on social networking sites

6. Financial Abuse

Financial abuse can take many forms, from denying you all access to funds, to making you solely responsible for all finances while handling money irresponsibly themselves. Money becomes a tool by which the abuser can further control the victim, ensuring either the Adult at Risk's financial dependence on them, or shifting



the responsibility of keeping a roof over the family's head onto the adult while simultaneously denying their ability to do so or obstructing them.

- Unusual financial transactions or loss of financial assets.
- Unexplained loss of valuable items, jewellery, heirlooms, personal collections etc.
- Changed signatories to bank accounts or other assets.
- A person who always visits on the day they receive state payments.
- Unexplained visits from neighbours or local young people, where these are not supervised.

Academy A-bridged Safeguarding Policy: Please contact the Academy Safeguarding Officer
Community Safeguarding Policy: Please contact the Community Safeguarding Officer
Stadium Safeguarding Policy: Please contact the Commercial Safeguarding Officer
Alternatively, please contact Safeguarding Lead

There is also guidance available from HM Government in the 'Working together to Safeguard Children 2023' Guidance. Which will aid when working and supporting Adults at Risk
Can be found using this link

https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf

Sale Sharks Safeguarding Lead Officer (s)	
Carol Baker: Club Safeguarding Lead email: carol.baker@salesharks.com phone: 07786 367 631	Andrew Jibson: Assistant Academy Manager Email: andrew.jibson@salesharks.com Phone: 07725 971 581



RFU Safeguarding Team	Senior Management Team
Vivien Rimmer: Senior Safeguarding Manager at RFU e-mail: Vivienrimmer@rfu.com	Paul Smith Chief Executive Officer Board of Directors

Safeguarding Contact Numbers

Sale Sharks Designated Safeguarding Officer

Mrs. Carol Baker
Sale Sharks Head of Safeguarding
E-mail: carol.baker@salesharks.com
Telephone: 07786367631

Mr. Andrew Jibson Telephone: 07725971581
Assistant Academy Manager
Email: andrew.jibson@salesharks.com

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Ann Craft Trust Point of Reference specific to ADULTS AT RISK

Supporting Adults at Risk and minimising the risk of harm

E-mail: ann-craft-trust@nottingham.ac.uk Phone: 0115 951 5400

Key Contacts:

Greater Manchester Police	0161 856 7584 or 0161 856 7577 Trafford.PPIU@gmp.pnn.police.uk
	Outside Office hours 0161 872 5050
Trafford M.B.C Adult Services	0161 253 5151 (weekdays only) 0161 253 6606 (out of hours)
Trafford Safeguarding Children Board	e-mail: tscb@trafford.gov.uk phone: 0161-911-8687 address: Trafford Town Hall, Talbot Road, Stretford, M32 0TH
Trafford LADO	MARAT@trafford.gov.uk
RFU: Kath Bennett Safeguarding Case Manager	e-mail: kathbennett@rfu.com phone: 02088317479
RFU: Chris Rawlings Safeguarding Compliance Coordinator/DBS	e-mail: chrisrawlings@rfu.com phone: 0208 831 7454 Fax: 0208 831 7442
RFU: Vivien Rimmer Safeguarding Manager RFU	e-mail: vivienrimmer@rfu.com
RFU Safeguarding team	Phone: 0208 831 6655
NSPCC 24-hour freephone	Phone: 0808 800 5000
Carol Baker:	E-mail: carol.baker@salesharks.com Phone: 07786367631
Ann Craft Trust Supporting Adults at Risk and minimising the risk of harm	E-mail: ann-craft-trust@nottingham.ac.uk Phone: <u>0115 951 5400</u>