



COMMUNITY  
SPORTS  
FOUNDATION

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# MANAGING ALLEGATIONS

Date of Next Update: June 2025

## **Scope**

This policy applies to all Norwich City Community Sports Foundation (“Foundation”) staff and affiliated entities to ensure a consistent standard across the Foundation, Norwich City Football Club (“Club”), Norwich City Women’s Football Club and Regional Development Programme.

This policy supersedes any previous policies on this topic prior to its issue date.

## **Policy Statement**

The Foundation believes that all our environments should be inclusive and welcoming for everyone and people should feel safe, valued, and respected in line with our own Foundation values. The Foundation is committed to creating a culture in which all concerns (including where the threshold for an allegation is not met) are shared responsibly with the right person and recorded and dealt with appropriately. Concerns should only be shared with those who need to know and not openly discussed.

This policy should encourage open and transparent culture and enable the Foundation to identify concerning, problematic or inappropriate behaviour at the earliest opportunity. It will ensure that individuals working for or with the Foundation are clear about professional boundaries and act in accordance with the Foundation’s Safeguarding Codes of Conduct. This policy will outline the processes to deal with such matters to minimise the risk of abuse.

It is essential that anyone make a disclosure feels confident, safe, and secure to ensure that they are given the best opportunity to have their allegation investigated thoroughly and diligently. The Foundation’s response and subsequent actions will have a direct bearing on that person’s confidence that they are being taken seriously. This confidence may be instrumental in preventing further abusive behaviour towards that individual or others.

The Foundation’s procedures will ensure that our actions are accountable and our decision-making transparent to demonstrate the highest standards of safeguarding action where practices have been found to be less safe.

## **Procedure**

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

All disclosures, incidents and allegations must be taken seriously by the Foundation and doing nothing is never an option.

Staff will respond in line with the Foundation’s safeguarding policies and training. This includes allegations about non-recent abuse and allegations made against deceased individuals.

If staff witness incidents or have any concerns pertaining to the safety and welfare of children or adults, they should contact a Designated Safeguarding Officer (DSO) or member of safeguarding staff without delay.

Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about a child’s or adults’ immediate safety.

This should also be considered as an option if a colleague encounters any difficulty contacting a DSO or safeguarding staff, or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately.

The Foundation will fully support anyone who in good faith reports their concerns about the safety and welfare of children, young people, and adults at risk.

### **What is an allegation?**

An allegation means that it is alleged that a person who works with children or adults has:

- Behaved in a way that has harmed a child or adult at risk
- Behaved in way that may have harmed a child or adult at risk
- Possibly committed a criminal offence against or related to a child or adult at risk
- Behaved in way that indicates they may be a risk to a child or adult at risk
- Behaved or may have behaved in a way that suggests they may not be suitable to work with children or adults at risk

An allegation can relate to your behaviour outside of a work, including your relationships with others, if they behave in a way in their personal life that raises safeguarding concerns.

The Foundations recognises that it takes extraordinary courage for someone to disclose abuse and will ensure that appropriate action is taken to support and protect the individual making the disclosure.

Staff should be aware the children or adults may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

For example, they may feel embarrassed humiliated, or may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

This should not prevent staff from having professional curiosity and speaking to a DSO or safeguarding staff.

It is also important that staff determine how best to build trusted relationships with children and adults at risk which best facilitates communication.

### **How to respond to an allegation**

#### **Listen**

Colleagues should give their full attention to the person disclosing the allegation and should keep their body language open and encouraging. They should respect pauses and not interrupt the person disclosing the allegation. Colleagues should limit any questioning to the minimum necessary to seek clarification of the circumstances of what has happened and to include dates and times only. When seeking clarification, colleagues should use the language of the person disclosing the allegation to show that it is their experience.

#### **Reassure**

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

## **Views and Wishes**

Colleagues should engage the person disclosing as far as possible about how best to respond to their safeguarding situation. They are expected to act in the best interests of children and adults. Advice should be sought from safeguarding staff without delay if colleagues are in any doubt about what action to take, including sharing information.

## **Safety**

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

## **Act**

Colleagues should explain to the person making the allegation what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example, due to a child's age or adults understanding, or if doing so would place the person disclosing at greater risk of harm.

Colleagues should refer details of the disclosure of an allegation to Safeguarding staff.

Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic, and other evidence must be preserved.

## **Record**

Good record keeping is essential safeguarding practice. It is vital that colleagues:

1. (i) make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made; and
2. (ii) make careful notes at the time or as soon as possible after, including dates and times of the incident. Sign them and keep them secure. Colleagues should contact Safeguarding staff if in doubt about recording requirements.

Colleagues must never:

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

## **Recording information**

All incidents, allegations and disclosures should be recorded contemporaneously and uploaded to My Concern or the People HR system as soon as possible.

If colleagues are unable to access these databases, a written record should include the following information:

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

Colleagues are expected to:

- provide clear, concise, and relevant information.
- record information in an objective and professional manner.
- record information of fact rather than assumption of what you have witnessed or been told.
- record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
- record observations, for example, a description of visible bruising or injuries.

Never ask someone to remove or adjust their clothing to observe any bruises, marks, or injuries. If more information is recalled later, this should be added as an addendum. The original record must not be changed. Colleagues should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

### **Confidentiality**

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. Those who need to know are those who have specific responsibilities to support and protect the child, adult or others who may be at risk. Examples would include statutory agencies, the Premier League, EFL and FA Safeguarding Teams, parents, and carers.

## **Communication and Media protocols**

All media enquiries and communications following any safeguarding incident or about our general safeguarding provision must be approved by the Foundation's Communications and Designated Safeguarding Team to ensure investigations and identities of those involved are not compromised.

## **Support for Staff Dealing with Disclosures**

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

Foundation employees have 24-hour access to the Employee Assistance Programme support line via Met Life by calling 0800 012 147 and quoting the reference 420J0464.

Volunteers and affiliated entities can contact the Operations Team for assistance with specific signposting and suggestions for accessing support.

The Charity Mind provide advice and support to anyone experiencing a mental health problem.

Infoline: 0300 123 3393

Email: [info@mind.org.uk](mailto:info@mind.org.uk)

Text: 86463

Post: Mind Infoline, PO Box 75225, London, E15 9FS

Their Infoline provides an information and signposting service which is open 9am to 6pm, Monday to Friday (except for bank holidays).

## **Support for colleagues subject to allegations or concerns**

When an allegation is made against a colleague, that suggests a risk of potential towards children or an adult, the Foundation have a duty to also support them and ensuring the safety of all those involved.

The Foundation understands that these situations can be worrying for colleagues and that the processes can sometimes be protracted.

The Foundation has responsibilities to:

- manage and minimise the stress caused by the allegation.
- inform the individual as soon as possible, explaining the likely course of action, guided by statutory bodies such as the Local Authority Designated Officer (LADO), and the police where necessary.
- advise the individual to contact their trade union representative, or a colleague for support.
- appoint a named representative to keep the person informed about the progress of the case.
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

HR staff will be able to provide additional advice and information where required.

## **Managing safeguarding concerns**

The Foundations safeguarding processes are underpinned by statutory guidance to effectively safeguard children and adults. The Foundation is committed to working in partnership with key statutory agencies (Health, Social Care, Education and Police), the FA, the Premier League and the EFL to achieve positive outcomes.

We strive to create a culture where safeguarding responsibilities and procedures for raising concerns are widely understood and embedded in our practice.

All safeguarding concerns will be managed on the secure 'My Concern' electronic database by trained users. All entries will be timely, accurate and written comprehensively to maintain high levels of accountability and transparency. An ethos of defensible decision making will be demonstrated through users explaining relevant actions and why they were undertaken.

## **Referral Thresholds**

### **Police**

The Foundation will contact Police via 101 or online means if a crime has been committed against a child, or adult within Foundation environments. The Foundation will contact them immediately via 999 if a child, or adult is in immediate danger.

### **Local Authority**

If the Foundation has a concern about a child or children, we will telephone the Local Authority Children's Advice and Duty Service (CADS) on 0344 800 8021 as a priority action and as soon as is reasonably practicable.

If the Foundation has a concern about an adult at risk, we will telephone the Local Authority Adult Social Care Department on 0344 800 8020 as a priority action and as soon as is reasonably practicable.

Staff will make sure we are prepared with the full details of the child or adult and their family or carers, plus what our concerns are, details of any support we have provided and what we would like to happen before making such report.

We will ensure we gain consent from the parent/carer unless to do so would place the child or adult at further risk of harm or undermine a criminal investigation. If we have not sought consent from the parent/carer we will inform the Local Authority worker of this and the reason, why. We will agree a way forward with the Local Authority worker and they should keep us informed of progress. They will send us a written record of our conversation within five working days.

The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police or for work with Early Help or local Adult Social Care assistance.

The Foundation will not investigate such matters and will be led by the Local Authority and/or the Police. The Foundation will make careful records of all conversations, including the dates and times of who we spoke to, the information shared, and the action agreed. The Foundation will not need to send a written referral.

Full details of these processes can be found at:

<https://www.norfolkscb.org/people-working-with-children/how-to-raise-a-concern/>

and

<https://www.norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm>

The Foundation understand that if we are unhappy about decisions made by statutory safeguarding partners, we can use the Norfolk Safeguarding Children Partnership 'Resolving Professional Disagreements' policy which can be found at:

<https://norfolkscp.org.uk/about/policies-procedures/complaints-and-professional-disagreements/102-resolving-professional-disagreements>

or the Adult Social Care Complaints process which can be found at:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/have-your-say/compliments-and-complaints/adult-care-complaints>

The Local Authority Designated Officer (LADO) is responsible for management and oversight of all child protection allegations made against staff and affiliated entities who work with children.

Adult Social Care similarly deal with such matters through their 'Speak Up' process.

Where concerns are made about our colleagues and the Foundation believes that the report could demonstrate that the member of staff in question has:

- Behaved in a way that has harmed, or may have harmed, a child or adult.
- Possibly committed a criminal offence against or related to a child or adult.
- Behaved towards a child or adult in a way which indicates they may pose a risk of harm to them; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk.

The Foundation will refer and consult with our LADO or Adult Social Care partners to ensure that correct safeguarding processes are followed and that our practice remains transparent and accountable.

In those cases which pass the Local Authority thresholds, the LADO or Adult Social Care will investigate the circumstances and subsequently adjudicate whether the person involved is suitable for continued work with children or adults at risk.

This matter will be separate to any internal investigation carried out in line with the Foundations Disciplinary Policy.

Throughout this process the person involved will be kept fully informed and supported through the process in line with our wellbeing arrangements.

Further information can be found:



<https://www.norfolk.gov.uk/children-and-families/keeping-children-safe/local-authority-designated-officer>

<https://www.norfolk.gov.uk/care-support-and-health/protecting-someone-from-harm/help-an-adult-at-risk-of-harm/what-happens-after-you-report-a-concern>

LADO Duty Desk Telephone number: 01603 307797

### **Football Authorities**

The Foundation will make referrals to the FA and Premier League/EFL Safeguarding Units within 24 hours (or as soon thereafter as practicable) where any referral to or from any external authority (including, without limitation, the Police, Local Authority, DBS, or Charity Commission) about abuse to any child or adult by any of our current, prospective, or former employees, staff members or workers. This also includes allegations of non-recent abuse.

The FA will assess people who pose, or may pose, a risk of harm and put in place appropriate safeguards. The FA's regulatory framework enables them to act against any affiliated person or organisation that breaches their safeguarding regulations and policies. On an individual level, The FA can put in place risk management measures ranging from education, mentoring and supervision agreements, to interim and permanent suspensions.

These Football Authorities may participate in safeguarding planning processes, such as LADO or Strategy meetings, commission independent inquiries and provide support to all those involved.

### **Disclosure and Barring Service**

The Foundations duty to refer to the Disclosure and Barring Service (DBS) is met when we have dismissed or removed a person from regulated activity (defined in the Safeguarding Vulnerable Groups Act 2006 as amended from time to time) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has been cautioned or convicted for a 'relevant offence'.

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

### **Engaged in 'relevant conduct'.**

The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm, or may incite another person to harm a child or an adult. Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

### **Charity Commission**

The Charity Commission is the statutory regulator of charities in England and Wales. The Norwich City Community Sports Foundation and the Premier League Charitable Foundation (PLCF) are required to report serious incidents, which include safeguarding issues, to the Charity Commission. Government guidance states that if a serious incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the police, donors, or another regulator.

The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations. Where there has been abuse or non-compliance, the Charity Commission may require corrective action to be taken by the Trustees, including directing them to take certain actions.

### **Monitoring and Evaluation**

Anonymised reporting of allegations will be reported to the Board of Trustee's Safeguarding Panel. Reporting data will also feature in the Annual Safeguarding Report along with any Lessons Learned to develop organisational learning.

### **Associated Policies**

Speak Up Policy  
Safeguarding Code of Conduct  
Information Sharing  
Low Level Concerns  
Safeguarding Children Policy  
Safeguarding Adult Policy  
Safer Recruitment

Policy Issue Date: June 2024  
Date of Next Update: June 2025

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.

