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Charlton Athletic Football Club

Adults at Risk Policy

2026 - 2027





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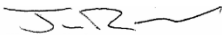
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Document Review

Last Review	By
August 2026	Connor Park

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Version	Date Released	Originator	Authorised	Comments
1.0	September 2025 16/9/2025	Ken Palmer Safeguarding Manager Ken Palmer		Annual Review
1.1	September 2026	Connor Park Senior Safeguarding Manager C Park		Updated to include changes to Safeguarding staff.



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ADULTS AT RISK POLICY

Introduction

Charlton Athletic Football Club is committed to ensuring the protection of Adults at Risk (formally Vulnerable Adults) through the development and implementation of effective policies and best practice. This policy considers legislation and guidance laid down by the Care Act 2014 and the Care and Support Statutory Guidance 2018. This is also supported by The Human Rights Act 1998, Data Protection Act 2018, and the GDPR 2018.

The board, the management and all staff (paid and voluntary) recognise and accept the responsibility to develop and raise awareness of the issues involved in working with Adults at Risk and to safeguard any Adults at Risk who attend any sessions, programmes, or activities.

Everyone's responsibility.

All CAFC staff and volunteers have a safeguarding responsibility. As per the reporting procedures the initial contacts will be the line manager and the Designated Safeguarding Officer.

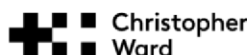
Equality statement

CAFC is committed to promoting equality and inclusion across all areas of our work including employment and service provision. At CAFC we are guided by our values and committed to tackling discrimination and promoting equality. We seek to develop an environment where all groups and individuals are treated fairly and in a consistent way. CAFC recognise that there are additional vulnerabilities to adults that identify as LGBTQ+, those who are in the care environment and those who are at additional risk such as being homeless or having a disability that requires an intervention.

We work within both the spirit and practice of the Equality Act 2010 by promoting a culture of trust and respect. We will support our employees and volunteers to implement the principles of equality and inclusion in the delivery of our services and activities. CAFC will also collaborate with partners in the community, voluntary, public, and private sectors to achieve this.

Scope

- Men's First Team
- Women's First Team
- Boys Academy
- Girls Academy





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Definition of Adult at Risk

The broad definition of an Adult at Risk as laid down by the Care Act 2014 is an adult.

- Who is 18 years of age or over.
- Has needs for care and support (whether the Local Authority is meeting any of those needs).
- Is experiencing, or at risk of abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse and neglect.

England (CARE Act 2014)

There is a Legal Duty on Local Authorities to provide support to “Adults at Risk.”

Safeguarding legislation applies to all forms of abuse that harms a person’s well-being.

An (Adult at Risk) may be a person who:

- Has a mental illness including dementia or a personality disorder.
- Has physical or sensory disability
- Has a learning disability.
- Has Neurological differences (Neurodiverse)
- Has a reduction in physical or mental capacity.
- Has a severe physical illness
- Is in the receipt of any form of healthcare.
- has issues with substance misuse (i.e., drugs or alcohol)
- Is receiving community services because of age, health, or disability.
- is an unpaid carer.
- is homeless or living in sheltered or residential care home.

The presence of a disability or age alone does not signify that an adult is necessarily at risk i.e., unable to take care of themselves or unable to protect themselves from abuse or exploitation.



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Adults at Risk - Forms of Abuse

Abuse may be defined as the wrongful application of power by someone in a dominant position over another adult. This can include the exploitation and other abusive activities where there has not been full or informed consent. Abuse also includes the maltreatment of an adult in forms such as physical abuse or neglect.

Abuse of an Adult at Risk could be:

- Physical abuse – these includes hitting, slapping, kicking, pushing, or withholding or misusing medication.
- Domestic Violence - any incident of threatening behaviour, violence or abuse between adults who are or have been in a relationship together, or between family members, regardless of gender or sexuality.
- Sexual abuse – this includes sexual assault and rape, or sexual acts where the vulnerable person has not (or could not give consent) or was forced to consent.
- Emotional abuse – this includes threats of harm, humiliation, intimidation, coercion, harassment, and criticism aimed at lowering self-esteem and confidence.
- Financial abuse – this includes fraud, theft, exploitation, misappropriation such as coercion to change will inheritance (i.e., property and possessions) and the misuse of benefits.
- Neglect – this includes withholding basic living requirements such as adequate nutrition, safe and warm environments, withholding medication and failing to provide access to required medical and social care treatment and interventions.
- Peer on Peer – abuse from another Adult at Risk.
- Self-neglect - This general term used to describe an adult at risk living in a way that puts their health, safety, or well-being at risk.
- Bullying – this includes a sustained campaign of emotional, physical, and verbal abuse (including discriminatory practice).
- Institutional – this includes poor or inadequate care, neglect or poor practice within a residential home, nursing home, or hospital.
- Radicalisation – where vulnerable adults are groomed into a particular ideology that can cause harm to themselves and others.
- Discriminatory – this is when an Adult at Risk is discriminated against because of their gender, religion, disability, or certain other protected characteristics.
- Modern Slavery – this is where when an individual is exploited by others, for personal or commercial gain.





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Principles of Adult Safeguarding under the CARE Act 2014.

- Empowerment – People being supported and encouraged to make their own decisions and informed consent.
- Prevention – it is better to take actions before harm occurs.
- Proportionality – the least intrusive response appropriate to the risk presented.
- Protection – support and representation for those in greatest need.
- Partnership – Local Solutions through services collaborating with their communities. Communities have a big part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

Working Practices

- CAFC will provide environments and programmes at which Adults at Risk feel safe and valued and listened to.
- CAFC will ensure that all staff (paid and voluntary) take responsibility to protect Adults at Risk from harm.
- CAFC will ensure all staff (paid and voluntary) working with Adults at Risk adhere to the CAFC Code of Conduct.
- CAFC will ensure all staff working with Adults at Risk will receive sufficient training.
- CAFC will exercise a Duty of Care and where necessary share information and/or concerns in a confidential manner with appropriate agencies such as the police or social services.
- CAFC will review this Policy bi-annually or before that if needs be (i.e., due to a change in legislation etc).
- Safeguarding will be a standard agenda item at all CAFC board meetings.



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Safer recruitment

CAFC will ensure that all staff (paid and voluntary) working with Adults at Risk will be subject to a safer recruitment process which will include.

- Completion of a CAFC application form and attendance at an interview.
- A DBS check where this is required i.e., regulated activity.
- Two references from past employers (or school / college for coaches either still attending the latter or having just left).
- Provision of original certificates of qualifications.
- Identity check.
- Right to Work check.
- Attendance at induction

Any issues relating to concerns raised over disclosures on the DBS will be discussed in terms of the risk that disclosure poses to any adult at risk by a panel made up of the Safeguarding Officer, appropriate line manager and a member of the HR Team. The owner of the DBS will also be invited to this meeting. A recommendation will then be made to the CAFC Safeguarding Manager.

Recruitment of ex-offenders

Charlton Athletic Football Club (CAFC) is committed to safeguarding and promoting the welfare of children, young people and Adults and expects all staff and volunteers to share this commitment. This role involves the supervision of and working with children, young people and adults. This role will require a Criminal Records Check (**CRC**) through the Disclosure and Barring Service (**DBS**) and clearance for work in football by the FA. As such this post is exempt for the Rehabilitation of Offenders Act 1974 and the applicant must disclose all previous convictions including spent convictions. The definition of 'Spent Convictions' has changed and information on the list of offences that will never be filtered from a criminal records check can be found at:

<https://www.gov.uk/government/publications/filtering-rules-for-criminal-record-check-certificates/new-filtering-rules-for-dbs-certificates-from-28-november-2020-onwards>

The Rehabilitation of Offenders Act 1974 ("1974 Act") primarily exists to support the rehabilitation into employment of reformed offenders who have stayed on the right side of the law.

Under the 1974 Act, following a specified period of time which varies according to the disposal administered or sentence passed, cautions and convictions (except those resulting in prison sentences of over four years and all public protection sentences*) may become spent. As a result, the offender is regarded as rehabilitated.





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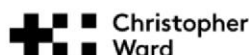
The 1974 Act places limits on what convictions and cautions an employer can ask an individual about and what they can consider. Any employer can ask a person to disclose unspent convictions and take these into account. Where the job or activity is listed in the Exceptions Order, a standard or (where the role is listed in Regulations made under the Police Act 1997) an enhanced disclosure certificate can be requested, and an employer can ask a person about any unprotected spent convictions and cautions – that means those spent convictions and cautions which are not protected and would be disclosed on a DBS certificate (under the rules described above).

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts, and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position. All applicants will be subject to CAFC's Safer Recruitment process.

CAFC ensures that all those in CAFC who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. CAFC also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of offenders, e.g., the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, CAFC ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Any member of staff that has content on their DBS when presenting themselves for an activity will have been risk assessed and will have been deemed as presenting no risk to any person on that activity. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. This is in line with the Football League Recommendations as well.

The same process will be used for the recruitment of ex-offenders. All safer recruitment steps will be followed including the use of the panel as detailed in the previous paragraph when the DBS check is received and sent to the applicant. If the appointment is made this may include a risk assessment being put in place at the commencement of employment.





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Training

All staff and volunteers will be required to complete the FA Safeguarding Training every 2 years.

Reporting Procedures

If there are concerns about an Adult at Risk, please report this to CAFC's Safeguarding Officer and log the concern using MyConcern.

If the issue is one of poor practice, then CAFC's Safeguarding Officer will either:

- Deal with the matter internally with the support of the relevant staff.
- Seek advice from the EFL or FA

If the concern is one of abuse, then the CAFC Safeguarding Officer will either contact the Police or the relevant Local Authority Safeguarding Adults Team, Domestic Abuse Support Service, MARAC, or all depending on the nature of the issue. The CAFC Safeguarding Officer will also contact the relevant EFL and FA Case Manager if the concern is a football related one.

If the allegation is against the Safeguarding Officer, then all information should be directed to another member of the safeguarding team (see contacts below) or the CAFC board Safeguarding Champion Paul Elliott paul.elliott@cafc.co.uk

The same procedure will be in place if the Safeguarding Officer is absent / on leave.

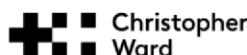
If the Adult at Risk needs immediate medical treatment they should be taken to hospital, or an ambulance called. If the latter is the case, then the ambulance staff should be informed that there is a concern regarding the adult. The CAFC Safeguarding Officer should then be informed to take the necessary actions in point previously stated.

For allegations against staff concerning an adult at risk first reports can be made to Department Heads who will inform the Safeguarding Officer or reports can go straight to the Safeguarding Officer.

Once received the Safeguarding Officer will work with SMT and the CAFC Personnel Officer to investigate the case and then bring in appropriate responses.

If the abuse is historical (i.e., non-recent abuse) in nature similar reporting procedures will be followed as above.

Information will be shared with appropriate organisations if it is to safeguard an adult at risk from potential abuse of abuse that is already occurring. This will be in line with CAFC's Data Protection and Information Sharing Policies. All referrals and information sharing will be





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managed with the strictest confidentiality, with the consent of the adult at risk (please see guidance on mental capacity below) and only shared with organisations that need to know.

The CAFC Designated Safeguarding Officer will collaborate with the Designated Safeguarding Officers on all relevant reported concerns or issues.

Mental Capacity Act 2005

The Statutory Principles of the Mental Capacity Act 2005 and the importance of the core principles of this Act is clear, with the principles included in the primary legislation, as section 1 (s.1) of the MCA, with chapter 2 of the accompanying 2007 Code of Practice devoted to their application in practice. As the principles have statutory status, they are part of the legal framework rather than best practice guidance, and as such **all those working with individuals experiencing problems with their mental capacity or decision-making must ensure that their actions, or inactions, are guided by them.**

The Act states that to make a decision we need to:

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

The five statutory principles are:

1. A person must be assumed to have capacity unless it is established that they lack capacity (s.1 (2)).
2. A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success (s.1 (3)).
3. A person is not to be treated as unable to make a decision merely because they make an unwise decision (s.1 (4)).
4. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests (s.1 (5)).
5. Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action (s.1)



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Consent

Consent must be gained from any Adult at Risk for services being provided by CAFC, or for referrals being made from CAFC to another agency. In the event of an Adult at Risk not being able to give consent, CAFC will try to gain this from the parent or carer depending on the mental capacity of the Adult at Risk.

If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should be respected. However, there are circumstances where a member of CAFC staff, (following discussion with the Safeguarding Officer and member of the Executive Team) can override such a decision, including:

- The person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act
- Other people are, or may be, at risk, including children.
- The adult is at risk of harming themselves or others.
- Sharing the information could prevent a crime.
- The alleged abuser has care and support needs and may also be at risk.
- A serious crime has been committed.
- Staff are implicated.
- The person has the mental capacity to make that decision, but they may be under duress or being coerced.
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral.
- A court order or other legal authority has requested the information.

Whistle blowing

CAFC is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all its practices. To achieve these ends, it encourages freedom of speech. It also encourages staff to use internal mechanisms (whistleblowing) for reporting any malpractice or illegal acts which represent a **safeguarding** concern (harm to an adult at risk) or omissions by its staff or volunteers including ex staff and volunteers.

Internal issues

- If staff and or volunteers have concerns about another staff member or volunteer, then this should be referred to the CAFC Designated Safeguarding Officer.
- Where there are concerns about the CAFC Safeguarding Officer these should be referred to the CAFC Safeguarding Champion another member of the safeguarding team.
-





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- In both the above the managing allegations procedures will be followed as laid out in section Eight of this policy and will potentially result in the reporting of the incident to the Local Authority Designated Officer (LADO) and statutory services.
- CAFC has a separate whistleblowing policy that is available for staff.

External issues

For external issues please contact either the Designated Safeguarding Officer or the Safeguarding Trustee or both. This again could result in the reporting of the incident to the Local Authority Designated Officer (LADO) and statutory services.

Club Safeguarding Team

Connor Park, Senior Safeguarding Manager

E: connor.park@cafc.co.uk

T: 07742 609513

Louise Cranmer, Women's Designated Safeguarding and Welfare Officer

E: louise.cranmer@cafc.co.uk

T: 07824 897760

Keely Nash, Men's Designated Safeguarding and Welfare Officer (Start date tbc)

E: keely.nash@cafc.co.uk

T: 07385473313

Dean Jarman U17-U21 Designated Safeguarding Officer

E: dean.jarman@cafc.co.uk

T: 07392 091923

Rachel Elliott U9-U16 Designated Safeguarding Officer

E: rachel.elliott@cafc.co.uk

T: 07385471147

More information can be found in the CAFC Whistle Blowing Policy.

Managing allegations against staff and volunteers

All allegations against staff will be taken seriously particularly if they:

- Behaved in a way that has harmed an Adult at Risk or may have harmed an adult at risk.
- Possibly committed a criminal offence against or related to Adult at Risk
- Behaved towards adult at risk in a way that indicates they are unsuitable to work with Adult at Risk.





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Please report any concerns to the DSO and record on MyConcern.

Once received the Safeguarding Officer will work with SMT to investigate the case and then bring in appropriate responses. The CAFC Disciplinary Policies and Procedures will be used to guide this process. Appropriate responses could include:

Referral to the Local Authority Designated Officer (LADO). This will be carried out immediately if this is required.

Contacts:

Royal Greenwich Borough LADO 020 8921 4438- Sadie.Bates@royalgreenwich.gov.uk

London Borough of Bexley LADO LADO@bexley.gov.uk 020 3045 5543

Kent County Council LADO kentchildrenslado@kent.gov.uk 03000 410888

- If the member of staff is in a Position of Trust, then this should be reported to the appropriate Adult Social Care within that respective area.
- If football related informing the FA /EFL Case Management Team (all within 72 hours)

Kent FA 01622 791850 info@KentFA.com

London FA 02076108360 info@londonfa.com

FA Case Management Team 0800 0835 902 safeguarding@thefa.com

EFL Safeguarding@efl.com or call 01772 325940.

WSL safeguarding@wslfootball.com

- Referral to the Police if the case is of a serious enough nature. The police will become the lead agency if they deem the allegation to be a criminal offence.

Emergency 999

Non-Emergency 101

The CAFC Safeguarding Officer or designated person shall also be responsible for contacting the parents / carers of the adult at risk.

Low Level Concerns

A low-level concern means the allegations against that staff member do not meet the harms threshold and this person does not pose an immediate risk towards adults they may be working with.





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The staff member in question may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and / or
- is otherwise not considered serious enough to consider a referral to the LADO.

Any Low-Level concerns will be investigated following the CAFC investigation process and if appropriate the CAFC Disciplinary processes.

Monitoring and review

The CAFC Adults at Risk Policy will be reviewed on a bi-annual basis. The Policy may also be updated if there are organisational changes or changes due to safeguarding incidents or new legislation.



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Appendix One

Abuse and Neglect (Ann Craft Trust)

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission, or ignorance.

There are several types and patterns of abuse and neglect and different circumstances in which they may take place.

Safeguarding legislation in each home nation lists categories of abuse differently however, they all include the following types of abuse:

- Physical
- Sexual
- Psychological
- Neglect
- Financial

Abuse can take place in any relationship and there are many contexts in which abuse might take place, e.g., Institutional abuse, Domestic Abuse, Forced Marriage, Human Trafficking, Modern Slavery, Sexual Exploitation, County Lines, Radicalisation, Hate Crime, Mate Crime, Cyber bullying, Scams. Some of these are named specifically within home nation legislations.

- A spouse, partner, or family member
- Neighbours or residents
- Friends, acquaintances, or strangers
- People who deliberately exploit adults they perceive as vulnerable.
- Paid staff, professionals or volunteers providing care and support.

Often the perpetrator is known to the adult and may be in a position of trust and/or power.

Abuse can take place within a sporting context and the person causing harm might be any other person. For example: a member of staff, a coach, a volunteer, a participant, or a fan.

Some examples of abuse within sport include:

- Harassment of a participant because of their (perceived) disability or other protected characteristics.
- Not meeting the needs of the participant e.g., training without a necessary break.
- A coach intentionally striking an athlete.
- One elite participant controlling another athlete with threats of withdrawal from their partnership.





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- An official who sends unwanted sexually explicit text messages to a participant with learning disabilities.
- A participant threatens another participant with physical harm and persistently blames them for poor performance.

Reviewed

Ratified by Board of Directors

Next Review

By



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