



**HELPING  
PEOPLE  
PARTICIPATE,  
DEVELOP  
& ACHIEVE**

ACCRINGTON STANLEY COMMUNITY TRUST

REGISTERED CHARITY NO. 1139575

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

# Foreword and Policy Introduction

Accrington Stanley Community Trust is fully committed to safeguarding and promoting the welfare of children, young people and adults at risk. Safeguarding is everyone's responsibility, and all staff, volunteers, partners and stakeholders are expected to share this commitment.

We recognise our duty of care to ensure that all participants are able to engage in our activities in a safe, supportive and inclusive environment. We take all safeguarding concerns seriously and will respond promptly, consistently, and in line with current legislation, statutory guidance, and football governance requirements.

This policy sets out the Trust's approach to:

- Preventing harm and reducing risk
- Recognising and responding to safeguarding concerns
- Supporting staff and volunteers to fulfil their responsibilities
- Working effectively with partners and statutory agencies

Safeguarding arrangements at Accrington Stanley Community Trust are led by a clear structure of accountability:

- **Board Safeguarding Lead:** Providing oversight, scrutiny and governance at Board level
- **Senior Safeguarding Manager (SSM):** Overall strategic responsibility for safeguarding and safer recruitment
- **Designated Safeguarding Officer (DSO):** Operational lead for safeguarding, responsible for managing concerns, referrals and casework
- **Deputy/Designated Safeguarding Leads (DSLs):** Supporting the DSO across programmes and ensuring safeguarding is embedded within delivery

All staff and volunteers are responsible for:

- Remaining vigilant to safeguarding risks
- Reporting concerns in line with this policy
- Maintaining appropriate professional boundaries
- Contributing to a safe organisational culture

This policy applies to all activities, programmes and environments delivered by Accrington Stanley Community Trust, including community programmes, education provision, health interventions, events, and partnership delivery.

The Trust operates in line with:

- The Football Association (FA) safeguarding framework
- Premier League Charitable Fund (PLCF) requirements
- Local Safeguarding Children Partnerships (LSCP)
- Relevant UK legislation including the Children Act 1989 & 2004 and Working Together to Safeguard Children

This policy will be reviewed annually, or sooner in response to changes in legislation, guidance, or organisational structure.

## **Martin Fearon**

Chief Executive Officer

Accrington Stanley Community Trust

Senior Safeguarding Manager: Martin Fearon

Designated Safeguarding Officer: Joanna Williams

Date: 16<sup>th</sup> April 2026

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# Safeguarding Commitment

Accrington Stanley Community Trust is committed to safeguarding and promoting the welfare of children, young people and adults at risk. We recognise that safeguarding is a fundamental part of our responsibility as an organisation and is central to all areas of our work.

The Board of Trustees, Senior Leadership Team and all staff acknowledge their collective and individual responsibility to ensure that all participants who engage with the Trust are protected from harm and are able to take part in our activities in a safe, inclusive and supportive environment.

We are committed to:

- Prioritising the welfare of children and young people in all decision-making
- Providing a safe environment where participants feel respected, valued and able to raise concerns
- Ensuring clear safeguarding leadership and accountability through our safeguarding structure
- Embedding safeguarding within all programmes and activities delivered by the Trust
- Responding promptly and appropriately to all safeguarding concerns
- Working in partnership with statutory agencies and safeguarding partners
- Ensuring all staff and volunteers are appropriately trained and supported to fulfil their safeguarding responsibilities
- Promoting a culture of vigilance, openness and professional curiosity

Safeguarding within the Trust is supported by a clear governance structure:

- The **Board Safeguarding Lead** provides oversight and ensures appropriate governance and scrutiny
- The **Senior Safeguarding Manager (SSM)** holds overall strategic responsibility for safeguarding
- The **Designated Safeguarding Officer (DSO)** leads operational safeguarding and manages concerns and referrals
- **Designated Safeguarding Leads (DSLs)** manage safeguarding within their departments, with oversight from the DSO

All staff and volunteers are required to:

- Be familiar with and adhere to this policy
- Complete safeguarding training appropriate to their role
- Recognise and respond to safeguarding concerns
- Report concerns immediately using the Trust's safeguarding reporting system (Patronus)
- Maintain appropriate professional boundaries at all times

The Trust adopts a zero-tolerance approach to abuse, neglect and exploitation, and is committed to ensuring that all concerns are taken seriously and managed in line with statutory guidance and best practice.

## Definitions and Types of Abuse

### Safeguarding Definition

Safeguarding is defined as:

- Protecting children and young people from maltreatment
- Preventing impairment of their health or development
- Ensuring that they grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes

This definition is in line with *Working Together to Safeguard Children*.

For adults at risk, safeguarding means protecting an individual's right to live in safety, free from abuse and neglect, in line with the *Care Act 2014*.

### **Definition of a Child**

A child or young person is defined as anyone under the age of 18.

### **Definition of an Adult at Risk**

An adult at risk is defined as a person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting those needs), and
- Is experiencing, or at risk of, abuse or neglect, and
- As a result of those care and support needs is unable to protect themselves

### **Types of Abuse**

Accrington Stanley Community Trust recognises that abuse can take many forms and may occur in person, online, or within relationships of trust.

### **Children and Young People**

Abuse may include, but is not limited to:

- **Physical Abuse**  
Causing physical harm, including hitting, shaking, throwing, poisoning, burning or otherwise causing injury.
- **Emotional Abuse**  
Persistent emotional maltreatment which may affect a child's emotional development, including conveying that they are worthless or inadequate.
- **Sexual Abuse**  
Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, including online abuse.
- **Neglect**  
The persistent failure to meet a child's basic physical and/or psychological needs.

### **Additional Safeguarding Risks**

The Trust also recognises specific safeguarding risks including:

- Child Criminal Exploitation (CCE) including county lines
- Child Sexual Exploitation (CSE)
- Peer-on-peer abuse, including bullying and harmful sexual behaviour
- Online abuse, including grooming and exploitation
- Domestic abuse
- Radicalisation and extremism (Prevent Duty)
- Honour-based abuse, including forced marriage and Female Genital Mutilation (FGM)
- Modern slavery and trafficking

Accrington Stanley Community Trust recognises its responsibilities under the **Prevent Duty** to safeguard individuals from the risk of radicalisation and extremism.

The Trust will:

- Ensure staff are aware of the signs of radicalisation and vulnerability to extremist ideologies
- Provide appropriate training and guidance to staff
- Promote a safe and inclusive environment where concerns can be raised
- Report concerns in line with safeguarding procedures, including referral to appropriate agencies where required

Concerns relating to radicalisation will be managed in the same way as other safeguarding concerns and must be recorded on Patronus and reported to the relevant DSL.

### **Adults at Risk**

Abuse of adults at risk may include:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Financial or material abuse

- Neglect and acts of omission
- Discriminatory abuse
- Organisational or institutional abuse
- Self-neglect

#### **Key Principles**

- Abuse can occur in any setting and may be carried out by adults or other children
- Individuals may experience more than one type of abuse
- Signs of abuse are not always obvious, and staff must remain vigilant
- Early identification and reporting of concerns is critical

## **Roles and Responsibilities**

Accrington Stanley Community Trust operates a clear safeguarding governance structure to ensure accountability, effective decision-making and appropriate oversight at all levels of the organisation. Safeguarding is everyone's responsibility; however, specific roles carry defined duties to ensure safeguarding is effectively managed.

#### **Board of Trustees**

The Board of Trustees holds ultimate responsibility for safeguarding within the Trust.

The Board will:

- Ensure the Trust has appropriate safeguarding policies, procedures and systems in place
- Provide strategic oversight and governance of safeguarding arrangements
- Receive assurance that safeguarding is effective, compliant and regularly reviewed
- Ensure sufficient resources are allocated to safeguarding
- Promote a culture where safeguarding is prioritised across the organisation

#### **Board Safeguarding Lead**

The Board Safeguarding Lead is responsible for providing safeguarding oversight at governance level.

They will:

- Provide independent scrutiny and challenge to safeguarding practice
- Act as the safeguarding link between the Board and senior leadership
- Ensure safeguarding remains a priority at Board level
- Seek assurance that safeguarding systems, processes and training are effective
- Support the Board in fulfilling its safeguarding responsibilities

The Board Safeguarding Lead does not manage individual safeguarding cases.

#### **Senior Safeguarding Manager (SSM)**

The Senior Safeguarding Manager (SSM) holds overall strategic responsibility for safeguarding across the Trust.

They will:

- Ensure safeguarding is embedded across all areas of the organisation
- Oversee the effectiveness of safeguarding systems and processes
- Maintain oversight of serious, high-risk or complex safeguarding cases
- Ensure compliance with statutory requirements and regulatory frameworks
- Escalate safeguarding risks to the Board where appropriate
- Ensure serious incidents are reported in line with Charity Commission requirements
- Support and challenge the DSO in the delivery of safeguarding responsibilities

#### **Designated Safeguarding Officer (DSO)**

The Designated Safeguarding Officer (DSO) is the operational lead for safeguarding within the Trust.

They will:

- Act as the central point of contact for safeguarding concerns
- Oversee and manage safeguarding cases across the organisation
- Ensure appropriate referrals are made to external agencies where required
- Provide supervision, guidance and support to DSLs
- Maintain oversight of safeguarding reporting through Patronus
- Monitor the quality and consistency of safeguarding records
- Identify themes, trends and emerging risks
- Lead safeguarding reporting within SMT meetings
- Ensure safeguarding training is delivered and maintained across the organisation
- Escalate high-risk or complex cases to the SSM

### **Designated Safeguarding Leads (DSLs)**

Designated Safeguarding Leads (DSLs) are responsible for safeguarding within their departments.

They will:

- Act as the first point of contact for safeguarding concerns within their area
- Ensure all concerns are recorded accurately and promptly on Patronus
- Assess and manage safeguarding concerns in line with Trust procedures
- Liaise with the DSO regarding complex or high-risk cases
- Support staff within their department in recognising and reporting concerns
- Ensure safeguarding practices are embedded within their delivery
- Monitor low-level concerns and identify patterns or risks
- Escalate concerns to the DSO where appropriate

DSLs are not expected to manage safeguarding in isolation and will receive oversight and support from the DSO.

### **All Staff and Volunteers**

All staff and volunteers have a responsibility to safeguard children, young people and adults at risk.

They must:

- Be familiar with and adhere to this policy and associated procedures
- Complete safeguarding training appropriate to their role
- Remain vigilant to safeguarding risks and indicators of harm
- Report concerns immediately to their DSL
- Record concerns accurately using Patronus
- Maintain appropriate professional boundaries at all times
- Never investigate safeguarding concerns themselves
- Never promise confidentiality to a participant

### **Safeguarding in Practice**

To ensure clarity and consistency:

- All safeguarding concerns must be recorded on Patronus
- DSLs manage safeguarding within their departments
- The DSO provides oversight and quality assurance across all cases
- The SSM maintains visibility of high-risk or serious concerns
- Safeguarding is reviewed regularly through SMT and Board governance structures

### **Key Principles of Accountability**

- Safeguarding responsibility is embedded at departmental level
- Oversight and quality assurance is provided centrally by the DSO
- Strategic accountability sits with the SSM
- Governance and scrutiny is maintained by the Board

Escalation will occur where concerns increase in risk, complexity, or require external agency involvement.

## Safer Recruitment

Accrington Stanley Community Trust is committed to ensuring that all individuals working with children, young people and adults at risk are suitable to do so. The Trust operates robust safer recruitment practices to prevent unsuitable individuals from gaining access to vulnerable groups.

Safeguarding is embedded throughout the recruitment process, from role design through to appointment and ongoing employment.

### Recruitment Principles

The Trust will:

- Adopt a **safeguarding-first approach** to all recruitment
- Ensure all roles are appropriately risk assessed
- Clearly define safeguarding responsibilities within job descriptions
- Promote safeguarding expectations within all recruitment materials
- Apply consistent and rigorous pre-employment checks
- Ensure all recruitment decisions prioritise the safety and welfare of participants

### Role Design and Advertising

All roles within the Trust will:

- Include a clear statement of safeguarding responsibility
- Specify whether the role involves **regulated activity**
- Include the requirement for a **Disclosure and Barring Service (DBS) check** where applicable
- Make clear that safeguarding is a condition of employment

Job adverts will include a safeguarding statement such as:

“Accrington Stanley Community Trust is committed to safeguarding and promoting the welfare of children and young people. All appointments are subject to appropriate pre-employment checks.”

### Application Process

Applicants will be required to:

- Complete a formal application form (CVs alone will not be accepted)
- Provide full employment history with explanations for any gaps
- Provide details of relevant qualifications
- Declare any criminal convictions or cautions (where appropriate)

The Trust will not rely solely on references or informal recommendations.

### Shortlisting

Shortlisting will:

- Be carried out by at least two individuals where possible
- Include consideration of safeguarding suitability
- Identify any inconsistencies or gaps in employment history
- Highlight any potential safeguarding concerns for further exploration at interview

### Interview Process

All interviews will:

- Include safeguarding-related questions
- Explore the candidate's understanding of safeguarding responsibilities
- Assess attitudes towards working with children and adults at risk
- Probe any gaps or inconsistencies in employment history

- Be conducted by suitably trained staff

Where appropriate, candidates may be asked to:

- Provide examples of safeguarding situations they have managed
- Demonstrate understanding of professional boundaries

### **Pre-Employment Checks**

All offers of employment are subject to satisfactory completion of pre-employment checks.

These may include:

#### **Identity Verification**

- Verification of identity using official documents (e.g. passport, driving licence)

#### **Right to Work**

- Confirmation of the individual's legal right to work in the UK

#### **References**

- A minimum of two references, including the most recent employer
- References will be verified and checked for safeguarding concerns

#### **Disclosure and Barring Service (DBS)**

- Enhanced DBS checks will be carried out for roles involving regulated activity
- Barred list checks will be undertaken where required
- DBS checks will be appropriate to the level of risk associated with the role

#### **Qualifications**

- Verification of relevant qualifications where required

#### **Additional Checks (where applicable)**

- Overseas criminal record checks
- Professional registration checks
- Prohibition or disqualification checks (where relevant)

#### **Risk Assessment of Disclosures**

Where a DBS check reveals information:

- A risk assessment will be undertaken
- Decisions will be made on a case-by-case basis
- The safety of children and adults at risk will always take priority
- The SSM and/or DSO will be involved in decision-making where appropriate

#### **Induction and Probation**

All new staff and volunteers will:

- Receive safeguarding induction training
- Be made aware of safeguarding policies and procedures
- Be introduced to the safeguarding reporting process (Patronus)
- Understand their role in safeguarding

Safeguarding will form part of the probation process, and suitability to work with vulnerable groups will be continually assessed.

#### **Ongoing Suitability and Supervision**

Safeguarding does not end at recruitment.

The Trust will ensure:

- Ongoing safeguarding training and updates
- Regular supervision and support

- Monitoring of conduct and professional boundaries
- Recording and management of low-level concerns
- Appropriate action where concerns arise about suitability

Staff are required to:

- Declare any changes to their circumstances that may affect their suitability
- Adhere to the Trust's code of conduct at all times

### **Contractors, Partners and Third Parties**

Where external organisations or individuals deliver services on behalf of the Trust:

- Appropriate safeguarding assurances will be obtained
- DBS and safeguarding compliance will be verified
- Clear safeguarding expectations will be set within contracts or agreements

The Trust retains overall responsibility for safeguarding within its activities.

### **Key Principles**

- Safer recruitment is a continuous process, not a one-time check
- The Trust operates a zero-tolerance approach to unsafe recruitment practices
- Safeguarding considerations override all other recruitment factors

## **Reporting a Concern and Managing Safeguarding Concerns**

Accrington Stanley Community Trust expects all staff, volunteers and those working on its behalf to act immediately if they have a safeguarding concern about a child, young person or adult at risk.

A safeguarding concern may arise from:

- A direct disclosure
- An observation of injuries, behaviour or presentation
- A report from another person
- A pattern of low-level concerns
- Concerns about staff behaviour
- Online activity or communication
- Information received from a partner agency

Staff are not responsible for deciding whether abuse has occurred. Their responsibility is to recognise, respond, record and report concerns promptly and appropriately.

### **Key Principles**

When responding to a safeguarding concern, all staff must:

- Take all concerns seriously
- Act without delay
- Prioritise the safety and welfare of the individual
- Record concerns accurately and factually
- Report concerns using **Patronus**
- Follow the Trust's escalation structure
- Never investigate the concern themselves
- Never promise confidentiality

### **Step 1: Recognise a Concern**

A safeguarding concern does not need to be proven before it is reported.

Staff must act if they:

- See something that concerns them
- Hear something that suggests a person may be at risk
- Notice a change in behaviour, mood, attendance or presentation
- Observe injuries or signs of distress
- Receive a disclosure
- Become aware of online, peer-on-peer or staff conduct concerns

If a member of staff is unsure whether something constitutes a safeguarding concern, they must still report it. It is always better to share a concern than to ignore it.

### **Step 2: Respond Appropriately**

If a child, young person or adult at risk discloses information or raises a concern, staff must respond calmly and supportively.

Staff should:

- Stay calm and listen carefully
- Allow the person to speak freely
- Reassure them that they have done the right thing by telling someone
- Be honest about what will happen next
- Explain that the information will need to be shared with the safeguarding team to help keep them safe
- Ask only basic, open questions if clarification is necessary

Staff must not:

- Promise to keep the information secret
- Ask leading or suggestive questions
- Press for more detail than is necessary
- Investigate or attempt to verify the concern
- Express shock, disbelief or judgement
- Confront the alleged perpetrator

### **Step 3: Take Immediate Action if There Is Immediate Risk**

If a person is in immediate danger, or if urgent medical or police intervention is required, staff must take immediate action.

This may include:

- Calling **999**
- Seeking emergency medical assistance
- Taking reasonable steps to ensure the person is safe
- Informing the relevant DSL or DSO as soon as possible

Emergency action must not be delayed while waiting to complete a Patronus report or speak to a manager.

### **Step 4: Record the Concern on Patronus**

All safeguarding concerns must be recorded on Patronus, the Trust's safeguarding reporting system, as soon as possible and always on the same day wherever practicable.

When completing a Patronus entry, staff must:

- Record the date, time and location of the incident or concern
- Record the names of those involved and any witnesses
- Use factual, objective language
- Use the exact words spoken by the individual where possible
- Record what they saw, heard or were told
- Record what action was taken
- Avoid opinion, diagnosis, assumption or speculation

Good recording should answer:

- What happened?
- When did it happen?
- Where did it happen?
- Who was involved?
- What was said?
- What action was taken?

If a member of staff is unable to access Patronus immediately, they must report verbally to their DSL without delay and ensure the record is completed as soon as possible afterwards.

#### **Step 5: Report to the Departmental DSL**

Once the concern has been logged on Patronus, the relevant **Departmental DSL** must be informed immediately.

The DSL will:

- Review the Patronus entry
- Assess immediate risk
- Consider context and any previous concerns
- Decide whether further action or escalation is required
- Liaise with the DSO where appropriate
- Ensure appropriate next steps are taken and recorded

#### **Step 6: DSO Oversight and Quality Assurance**

The **Designated Safeguarding Officer (DSO)** will receive notifications through Patronus for oversight purposes.

The DSO will:

- Maintain oversight of safeguarding activity across the Trust
- Quality assure safeguarding records and decision-making
- Support DSLs in case management
- Identify patterns, trends and emerging risks
- Ensure appropriate escalation where required
- Coordinate referrals to external agencies

#### **Step 7: Escalate Where Required**

Concerns must be escalated where risk or complexity increases.

A DSL must escalate to the DSO where:

- There is risk of significant harm
- The concern is complex or repeated
- There are patterns of low-level concerns
- Exploitation, abuse or criminal behaviour is suspected
- A referral to external agencies may be required
- The concern involves a staff member

The DSO will escalate to the **SSM** where:

- The concern is high-risk or serious
- There is a staff allegation
- External agencies (police/social care) are involved
- There is reputational or governance risk

#### **Step 8: Managing Concerns About Staff**

Concerns about staff must be reported immediately to the **DSO or SSM**.

- Do not inform the staff member yourself
- Do not investigate
- Record on Patronus

- Escalate immediately

If the concern involves the DSO → escalate to SSM

If the concern involves the SSM → escalate to Board Safeguarding Lead

### **Step 9: Information Sharing**

Information will be shared:

- On a need-to-know basis
- In line with safeguarding guidance

Consent is not required where there is risk of harm.

Safeguarding always takes priority over data protection concerns.

### **Step 10: External Referrals**

Referrals may be made to:

- Children's Social Care
- Adult Social Care
- Police
- LADO
- FA / EFL safeguarding
- Charity Commission (where required)

Referrals are coordinated by the DSO, with SSM oversight where appropriate.

### **Step 11: Ongoing Case Management**

The Trust will ensure:

- Ongoing monitoring of concerns
- Accurate record keeping within Patronus
- Identification of patterns and risk
- Appropriate support to individuals
- Continuous improvement in safeguarding practice

### **Immediate Guidance for Staff**

If you have a safeguarding concern:

1. Recognise
2. Respond
3. Record on Patronus
4. Report to your DSL
5. Escalate if urgent

If in doubt — record and report.

### **Safeguarding Procedure Summary**

If you have a concern:

1. Recognise
2. Respond
3. Record on Patronus
4. Report to your DSL
5. Escalate if required

If immediate danger → call **999**

## Low-Level Concerns, Allegations and Position of Trust

Accrington Stanley Community Trust is committed to promoting a culture of openness, transparency and accountability, where concerns about the behaviour of staff and volunteers are recognised and addressed at the earliest opportunity.

This includes both:

- **Low-level concerns** (which may not meet the threshold for an allegation)
- **Allegations** that may indicate a person poses a risk to children or adults at risk

All concerns will be taken seriously and managed in a fair, proportionate and consistent manner.

### Position of Trust

All staff, volunteers and individuals working on behalf of the Trust are in a position of trust.

This means they must:

- Maintain appropriate professional boundaries at all times
- Act in a way that protects the welfare of children and adults at risk
- Avoid behaviour that could be misinterpreted or lead to allegations
- Not abuse their position of power, influence or responsibility

Any breach of these expectations may result in safeguarding action.

### Low-Level Concerns

A low-level concern is any concern, no matter how small, that an individual working with children or adults at risk may have:

- Acted in a way that is inconsistent with the Trust's code of conduct
- Behaved in a way that could be perceived as inappropriate
- Demonstrated poor judgement or boundary issues
- Created a sense of unease or concern, even if no harm has occurred

Examples may include:

- Inappropriate tone, language or behaviour
- Favouritism towards a participant
- Over-familiarity or blurred boundaries
- Use of personal devices or communication outside agreed channels
- Isolated incidents of poor professional judgement

Low-level concerns do not necessarily indicate abuse, but they are important in identifying patterns of behaviour and managing risk early.

### Reporting Low-Level Concerns

All low-level concerns must be:

- Reported promptly
- Recorded on Patronus
- Shared with the DSL, DSO or SSM as appropriate

Staff should not:

- Dismiss concerns as insignificant
- Attempt to manage concerns informally
- Ignore patterns of behaviour

Early reporting enables the Trust to:

- Identify patterns

- Provide guidance or intervention
- Prevent escalation into more serious concerns

### **Managing Low-Level Concerns**

Low-level concerns will be:

- Reviewed by the DSL and/or DSO
- Recorded and monitored appropriately
- Managed proportionately depending on the nature of the concern
- Used to inform supervision, training or guidance

Where patterns emerge, or concerns increase in frequency or severity, they will be escalated accordingly.

Records of low-level concerns will be retained in line with safeguarding and HR guidance.

### **Allegations Against Staff or Volunteers**

An allegation is where a person working with children or adults at risk has:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk
- Possibly committed a criminal offence
- Behaved in a way that indicates they may pose a risk of harm
- Behaved in a way that suggests they may be unsuitable to work with vulnerable groups

Allegations may arise from:

- A disclosure
- A report from another person
- Observed behaviour
- Patterns of low-level concerns

### **Reporting Allegations**

Any allegation must be reported immediately.

- Concerns must be recorded on Patronus
- The concern must be reported directly to the **DSO or SSM**
- The individual concerned must **not** be informed by the person reporting
- No internal investigation must be undertaken by staff

If the allegation relates to:

- The **DSO** → report directly to the **SSM**
- The **SSM** → report directly to the **Board Safeguarding Lead**

### **Managing Allegations**

All allegations will be managed in line with statutory guidance and local safeguarding procedures.

The Trust will:

- Act promptly and proportionately
- Seek advice from the **Local Authority Designated Officer (LADO)** where appropriate
- Consider referral to police or social care where required
- Ensure the safety of all individuals involved
- Maintain confidentiality and information sharing on a need-to-know basis

The Trust will not investigate allegations internally without appropriate external advice where required.

### **Suspension and Risk Management**

Where necessary, the Trust may:

- Remove an individual from duties
- Restrict contact with children or adults at risk
- Implement interim safeguarding measures

This is a neutral act and does not imply guilt.

Decisions will be made in consultation with:

- The SSM
- HR (where applicable)
- LADO or external agencies

### **Support for Individuals**

The Trust recognises that safeguarding concerns can impact all parties involved.

The Trust will:

- Provide appropriate support to the individual raising the concern
- Provide support to the individual subject to the concern or allegation
- Ensure the welfare of children and adults at risk remains the priority

### **Recording and Confidentiality**

All concerns, including low-level concerns and allegations, must be:

- Recorded on Patronus
- Stored securely
- Managed in line with safeguarding and data protection requirements

Information will be shared:

- On a need-to-know basis
- In line with safeguarding responsibilities

### **Key Principles**

- Low-level concerns must never be ignored
- Early reporting protects individuals and the organisation
- Patterns of behaviour are critical in identifying risk
- Allegations must be handled quickly, fairly and appropriately
- Safeguarding always takes precedence over organisational reputation

## **Training, Supervision and Safeguarding Culture**

Accrington Stanley Community Trust is committed to ensuring that all staff, volunteers and Trustees are appropriately trained, supported and equipped to fulfil their safeguarding responsibilities.

Safeguarding is not a one-time requirement but an ongoing organisational priority. The Trust promotes a culture of vigilance, openness and continuous improvement, where safeguarding is embedded into everyday practice.

### **Safeguarding Training**

All individuals working on behalf of the Trust must complete safeguarding training appropriate to their role.

The Trust will ensure:

- All staff and volunteers receive safeguarding training at induction
- Training is role-specific, reflecting the level of responsibility
- Training is updated regularly in line with guidance and best practice
- Attendance and completion of training is recorded and monitored
- Staff understand how to recognise, respond, record and report concerns
- Staff are trained in the use of the Trust's safeguarding reporting system (Patronus)

Training will include, but is not limited to:

- Recognising signs of abuse and neglect
- Responding to disclosures
- Recording concerns accurately
- Professional boundaries and code of conduct
- Low-level concerns and allegations
- Online safety and emerging risks
- Safeguarding responsibilities within specific roles

### **Enhanced Training for Safeguarding Leads**

Individuals in safeguarding leadership roles will receive enhanced and ongoing training.

### **Designated Safeguarding Officer (DSO)**

The DSO will:

- Undertake advanced safeguarding training
- Maintain up-to-date knowledge of legislation and guidance
- Receive ongoing professional development
- Engage with external safeguarding networks and agencies

### **Designated Safeguarding Leads (DSLs)**

DSLs will:

- Receive enhanced safeguarding training relevant to their role
- Be supported to lead safeguarding within their departments
- Deliver internal safeguarding training to staff teams
- Be confident in managing concerns and recognising thresholds for escalation

The Trust will explore additional training opportunities through:

- The English Football League (EFL)
- The Football Association (FA)
- Local safeguarding partnerships
- Other recognised safeguarding training providers

### **Supervision and Support**

Safeguarding leaders will receive appropriate supervision and support to ensure effective decision-making and accountability.

The Trust will ensure:

- The DSO provides oversight, guidance and support to DSLs
- DSLs have access to advice and support when managing safeguarding concerns
- Safeguarding cases are reviewed where appropriate
- Complex or high-risk cases are escalated for additional oversight
- Staff feel confident seeking guidance when unsure

Supervision may include:

- Informal support and guidance
- Case discussions
- Review of safeguarding records
- Reflection on decision-making

### **Safeguarding Oversight and Governance**

Safeguarding is embedded within the Trust's governance framework.

The Trust will ensure:

- Safeguarding is a standing agenda item at monthly SMT meetings
- The DSO leads safeguarding updates at SMT

- Safeguarding data, themes and trends are reviewed regularly
- High-risk concerns are escalated appropriately
- Training compliance is monitored
- Policy and practice are regularly reviewed

The **Senior Safeguarding Manager (SSM)** will maintain strategic oversight and ensure safeguarding risks are appropriately managed.

The **Board Safeguarding Lead** and Board of Trustees will receive assurance that safeguarding is effective and compliant.

### **Safeguarding Culture**

The Trust is committed to creating and maintaining a strong safeguarding culture.

This includes:

- Promoting a culture where safeguarding is everyone's responsibility
- Encouraging staff to speak up and report concerns early
- Ensuring staff feel safe and supported when raising concerns
- Reinforcing that no concern is too small to report
- Supporting professional curiosity and challenge
- Ensuring safeguarding is embedded within everyday practice

The Trust adopts a no-blame culture where concerns raised in good faith are supported and valued.

### **Continuous Improvement**

The Trust is committed to learning and improving safeguarding practice.

This will be achieved through:

- Reviewing safeguarding cases and outcomes
- Identifying patterns and emerging risks
- Learning from incidents and near misses
- Responding to audit findings and recommendations
- Updating policies, procedures and training accordingly

Safeguarding is a dynamic area, and the Trust will ensure its practice evolves in line with:

- Legislative changes
- National guidance
- Football governance requirements
- Local safeguarding priorities

### **Key Principles**

- Safeguarding training is mandatory and ongoing
- Safeguarding leaders are supported and developed
- Safeguarding is embedded in governance and leadership
- Culture is as important as compliance
- Continuous improvement is essential

## **Whistleblowing, Complaints and Escalation**

Accrington Stanley Community Trust is committed to creating a culture where individuals feel confident and supported to raise concerns about safeguarding practice, staff conduct or organisational behaviour.

The Trust recognises that safeguarding concerns may not always relate to direct harm, but may involve:

- Poor practice
- Unsafe systems or processes
- Concerns about leadership or decision-making
- Failure to act on safeguarding concerns

All concerns raised in good faith will be taken seriously and handled appropriately.

### **Whistleblowing**

Whistleblowing is the process of raising concerns about wrongdoing, malpractice or risks within an organisation.

This may include concerns about:

- Safeguarding practice
- Staff behaviour or conduct
- Failure to follow safeguarding procedures
- Unsafe or unethical organisational practice
- Attempts to conceal safeguarding concerns

The Trust encourages all staff and volunteers to raise concerns at the earliest opportunity.

### **Raising a Concern Internally**

Where possible, concerns should be raised within the organisation through appropriate channels.

Staff and volunteers can raise concerns with:

- Their **Departmental DSL**
- The **Designated Safeguarding Officer (DSO)**
- The **Senior Safeguarding Manager (SSM)**
- The **Board Safeguarding Lead**

Concerns should also be recorded on Patronus where they relate to safeguarding.

The Trust will ensure:

- Concerns are taken seriously
- Concerns are reviewed promptly
- Appropriate action is taken
- Feedback is provided where possible

### **Escalation Outside the Organisation**

If an individual feels unable to raise a concern internally, or believes the concern has not been appropriately addressed, they may escalate externally.

This may include:

- Local Authority Safeguarding Teams
- Local Authority Designated Officer (LADO)
- Police
- The Football Association (FA)
- The English Football League (EFL)
- NSPCC Whistleblowing Helpline

The Trust supports the right of individuals to escalate concerns externally where necessary.

### **Protection for Whistleblowers**

The Trust is committed to ensuring that individuals who raise concerns in good faith are protected.

This includes:

- Ensuring concerns are treated confidentially where possible

- Protecting individuals from victimisation or retaliation
- Supporting staff throughout the process
- Taking action against any inappropriate behaviour towards whistleblowers

No individual will be disadvantaged for raising a genuine concern.

### Complaints

Safeguarding concerns may also arise through complaints made by:

- Participants
- Parents or carers
- Partner organisations
- Members of the public

All complaints relating to safeguarding will be:

- Taken seriously
- Logged and recorded appropriately
- Reviewed in line with safeguarding procedures
- Escalated where required

Complaints that involve safeguarding concerns will always take priority over standard complaints procedures.

### Managing Complaints with Safeguarding Elements

Where a complaint includes a safeguarding concern:

- The safeguarding element will be managed in line with this policy
- The concern will be recorded on **Patronus**
- The DSO and/or SSM will be informed
- Appropriate safeguarding action will be taken

The Trust will ensure that safeguarding concerns are not delayed or overlooked due to complaints processes.

### Escalation Within the Trust

The Trust operates a clear escalation structure:

- Staff report concerns to their **DSL**
- DSLs escalate to the **DSO** where required
- The DSO escalates to the **SSM** for high-risk or serious matters
- The SSM escalates to the **Board Safeguarding Lead** where appropriate

Escalation will occur where:

- Risk increases
- Concerns are complex or repeated
- External agencies are required
- There is organisational or reputational risk

### Professional Disagreement

At times, staff may disagree with safeguarding decisions or thresholds.

The Trust encourages professional challenge where appropriate.

Staff should:

- Raise concerns respectfully
- Seek clarification from the DSL or DSO
- Escalate concerns if they believe a decision places someone at risk

Professional disagreement must not prevent appropriate safeguarding action.

### Key Principles

- Concerns must be raised early
- Individuals must feel safe to speak up
- Safeguarding concerns override organisational hierarchy
- Escalation is a sign of good practice, not failure
- The welfare of children and adults at risk is always the priority

## Information Sharing and Confidentiality

Accrington Stanley Community Trust recognises that appropriate information sharing is essential to effective safeguarding. Timely and accurate sharing of information can be critical in protecting children, young people and adults at risk from harm.

The Trust will ensure that information is shared responsibly, lawfully and in line with safeguarding guidance.

### Key Principles

The Trust will:

- Share information **where it is necessary to safeguard an individual**
- Ensure information is **relevant, accurate and proportionate**
- Share information **on a need-to-know basis only**
- Record decisions and reasons for sharing or not sharing information
- Ensure staff understand when and how to share information appropriately

Safeguarding concerns will always take priority over organisational, reputational or data protection considerations.

### When Information Should Be Shared

Information should be shared where:

- A child or adult at risk is at risk of harm
- A crime may have been committed
- There are concerns about abuse, neglect or exploitation
- Early sharing may prevent escalation of risk
- A referral to an external agency is required

Staff should not delay sharing information if doing so could place someone at further risk.

### Consent

Where appropriate, the Trust will seek consent before sharing information.

However, consent is not required where:

- A child or adult at risk is at risk of harm
- Seeking consent would increase the risk of harm
- A serious crime may have been committed
- There is a legal or safeguarding duty to share information

Where consent is not sought or is refused, the reason for sharing information must be clearly recorded.

### Sharing Information with External Agencies

Information may be shared with external agencies including:

- Children's Social Care
- Adult Social Care
- Police
- Local Authority Designated Officer (LADO)

- Health services
- The Football Association (FA)
- The English Football League (EFL)
- Other safeguarding partners

Information will be shared:

- In line with safeguarding responsibilities
- Using secure and appropriate methods
- With clear justification and documentation

External referrals will ordinarily be coordinated by the **Designated Safeguarding Officer (DSO)**, with oversight from the **Senior Safeguarding Manager (SSM)** where appropriate.

### **Confidentiality**

Safeguarding information is highly sensitive and must be handled appropriately.

The Trust will ensure:

- Information is stored securely
- Access is restricted to those who need to know
- Records are maintained in line with safeguarding and data protection requirements
- Confidentiality is respected, but not at the expense of safeguarding

Staff must understand that:

Safeguarding concerns cannot be kept confidential where there is a risk of harm.

### **Recording and Storage of Information**

All safeguarding concerns must be recorded using the Trust's safeguarding reporting system (Patronus).

The Trust will ensure:

- Records are accurate, factual and up to date
- Information is stored securely within Patronus
- Access to records is appropriately controlled
- Records are retained in line with safeguarding and legal requirements

All decisions relating to information sharing must be recorded clearly within Patronus.

### **Data Protection and Safeguarding**

The Trust complies with the Data Protection Act 2018 and UK GDPR.

However, staff must be aware that:

- Data protection legislation does not prevent information sharing for safeguarding purposes
- The safety and welfare of individuals takes precedence over data protection concerns
- Information can be shared without consent where there is a safeguarding need

Staff should seek advice from the DSO if they are unsure about information sharing decisions.

### **Professional Judgement**

Staff are expected to use professional judgement when making decisions about information sharing.

If in doubt, staff should:

- Seek advice from their DSL or the DSO
- Record their decision-making
- Prioritise the safety and welfare of the individual

Failure to share information appropriately can place individuals at risk.

### Key Principles

- Information sharing is essential to safeguarding
- Safeguarding concerns override confidentiality where there is risk
- Decisions must be recorded and justified
- Information must be shared appropriately, not withheld unnecessarily

## Policy Review, Monitoring and Governance

Accrington Stanley Community Trust is committed to ensuring that its safeguarding policy and practices remain effective, compliant and reflective of current legislation, guidance and organisational needs.

Safeguarding is subject to ongoing monitoring, review and governance to ensure continuous improvement and accountability at all levels of the organisation.

### Policy Review

This policy will be:

- Reviewed annually as a minimum
- Reviewed sooner in response to:
  - Changes in legislation or statutory guidance
  - Changes in organisational structure or roles
  - Safeguarding incidents or emerging risks
  - Audit findings or recommendations
  - Feedback from staff, participants or partners

The review process will ensure that the policy remains:

- Up to date
- Effective in practice
- Aligned with best practice and regulatory requirements

### Monitoring and Quality Assurance

The Trust will monitor the effectiveness of safeguarding practice through:

- Regular review of safeguarding concerns recorded on **Patronus**
- Analysis of safeguarding data, trends and themes
- Review of case management and decision-making
- Monitoring of training completion and compliance
- Feedback from staff, participants and partners
- Internal and external audits where appropriate

The **Designated Safeguarding Officer (DSO)** is responsible for leading operational monitoring and identifying areas for improvement.

### Safeguarding Oversight at SMT Level

Safeguarding is embedded within the Trust's senior leadership governance.

The Trust will ensure:

- Safeguarding is a standing agenda item at monthly SMT meetings
- The DSO provides regular safeguarding updates
- Emerging risks, themes and trends are discussed
- High-risk or complex cases are reviewed (appropriately anonymised)
- Training compliance and safeguarding performance are monitored
- Actions and improvements are agreed and recorded

This ensures safeguarding remains visible, accountable and actively managed at senior level.

## **Board Oversight and Governance**

The Board of Trustees holds ultimate responsibility for safeguarding governance.

The Trust will ensure:

- The Board receives appropriate safeguarding assurance
- The **Board Safeguarding Lead** provides oversight and scrutiny
- Safeguarding risks are escalated where necessary
- Policies and procedures are reviewed and approved at Board level
- The Board is confident that safeguarding arrangements are effective

The Board does not manage individual cases but ensures that systems, processes and leadership are robust.

## **Roles and Accountability**

Safeguarding governance is structured as follows:

- **Board Safeguarding Lead** – Governance oversight and scrutiny
- **Senior Safeguarding Manager (SSM)** – Strategic accountability
- **Designated Safeguarding Officer (DSO)** – Operational oversight and quality assurance
- **Designated Safeguarding Leads (DSLs)** – Departmental safeguarding leadership

This structure ensures that safeguarding is:

- Embedded across all levels
- Supported operationally
- Overseen strategically
- Scrutinised at Board level

## **Continuous Improvement**

The Trust is committed to continuous improvement in safeguarding practice.

This includes:

- Learning from safeguarding cases and incidents
- Responding to audit findings and recommendations
- Updating policies, procedures and training
- Identifying and responding to emerging risks
- Engaging with external safeguarding partners and networks

Safeguarding practice will evolve in line with:

- Legislative changes
- National and local guidance
- Football governance requirements
- Organisational learning

## **Record Keeping and Documentation**

The Trust will maintain accurate and secure records to demonstrate safeguarding compliance.

This includes:

- Safeguarding concerns recorded on Patronus
- Training records and compliance data
- Safeguarding meeting minutes and action plans
- Policy review records and version control

Records will be retained in line with safeguarding and legal requirements.

## **Key Principles**

- Safeguarding is subject to ongoing review and scrutiny

- Governance is clear, structured and accountable
- Safeguarding is embedded within leadership and decision-making
- Continuous improvement is essential to effective safeguarding

# Appendix 1 – Safeguarding Contacts

## Accrington Stanley Community Trust Safeguarding Team

### Designated Safeguarding Officer (DSO)

Joanna Williams

✉ [safeguarding@stanleytrust.co.uk](mailto:safeguarding@stanleytrust.co.uk)

### Senior Safeguarding Manager (SSM)

Martin Fearon

✉ [martin.fearon@stanleytrust.co.uk](mailto:martin.fearon@stanleytrust.co.uk)

### Designated Safeguarding Leads (DSLs)

Lee Walsh – Sport & Health

✉ [lee.walsh@stanleytrust.co.uk](mailto:lee.walsh@stanleytrust.co.uk)

Sarah Hunt – Facility & Administration

✉ [sarah.hunt@stanleytrust.co.uk](mailto:sarah.hunt@stanleytrust.co.uk)

Stefan Wilson – Education

✉ [stefan.wilson@stanleytrust.co.uk](mailto:stefan.wilson@stanleytrust.co.uk)

Rhian Sabatino-Richmond – Community Engagement

✉ [rhian.sabatino@stanleytrust.co.uk](mailto:rhian.sabatino@stanleytrust.co.uk)

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## External Safeguarding Contacts

### Emergency Services

☎ 999

### Lancashire County Council Social Services

☎ 0300 123 6720 (24-hour helpline)

### Local Authority Designated Officer (LADO)

☎ 01772 536694

### NSPCC Helpline

☎ 0808 800 5000

### Childline

☎ 0800 1111

### English Football League (EFL)

✉ [safeguarding@efl.com](mailto:safeguarding@efl.com)

### The Football Association (FA)

✉ [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com)

# Appendix 2 – Safeguarding Reporting Flowchart

## What To Do If You Have a Concern

### 1. Recognise

You see, hear or suspect something is not right



### 2. Respond

- Stay calm
- Listen
- Do not promise confidentiality
- Do not investigate



### 3. Record

- Log concern on **Patronus** immediately
- Use factual, accurate information



### 4. Report

- Inform your **Departmental DSL**



### 5. Escalate (if required)

- DSL → DSO
- DSO → SSM
- SSM → Board (if required)



### Immediate Risk?

→ Call **999** immediately

## Appendix 3 – Quick Safeguarding Guide for Staff

**If you are worried about a child, young person or adult at risk:**

**DO:**

- ✓ Listen carefully
- ✓ Take concerns seriously
- ✓ Reassure appropriately
- ✓ Record facts accurately
- ✓ Report immediately via Patronus

**DO NOT:**

- X Promise confidentiality
- X Ask leading questions
- X Investigate yourself
- X Delay reporting
- X Ignore “small” concerns

**Remember:**

- Safeguarding is everyone’s responsibility
- If in doubt — record and report
- It is better to report and be wrong than not report at all

## Appendix 4 – Safeguarding Structure Overview

**Board Safeguarding Lead**

Purves Ali  
(Governance Oversight)



**Senior Safeguarding Manager (SSM)**

Martin Fearon  
(Strategic Accountability)



**Designated Safeguarding Officer (DSO)**

Joanna Williams  
(Operational Oversight & Quality Assurance)



**Designated Safeguarding Leads (DSLs)**

Lee Walsh | Sarah Hunt | Stefan Wilson | Rhian Sabatino-Richmond  
(Departmental Safeguarding Management)

## Appendix 5 – Policy Version Control

Version	Date	Author	Summary of Changes	Approved By
1.0	16/04/2026	Martin Fearon	Initial New Policy Created	Board of Trustees

## Appendix 6 – Related Policies and Documents

This policy should be read alongside:

- Staff Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy