



Newcastle United Football Club
Engaging with Vulnerable Groups Policy – Matchday's, Functions,
Tours and Activities

Season 2015 - 2016

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Engaging with Vulnerable Groups – Matchdays, Events, Tours and Activities



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Introduction

In addition to the general Safer Working Practice considerations outlined in the Club's other Safeguarding policies, it is important to identify specific and unique scenarios that exist by virtue of the Club's primary function as a football club that provides an entertainments service to members of the public and the Charity's function as a community focused organisation. Such functionality requires additional, specific Safeguarding considerations in order to ensure the effective Safeguarding of children, young people and vulnerable adults.

Rules, Regulations and Guidance

The Club/Charity is governed by the rules and regulations set out by several key governing agencies including the Government, Football Association and the Premier League amongst others. The content of this policy is underpinned by legislative and statutory documents and policies as presented by these key governing agencies.

Key documents underpinning this policy include:

- *Football Ground Regulations (2015)* – Premier League
- *The Public Order Act (1986)* – HM Government
- *Health and Safety at Work Act (1974)* – Health & Safety Executive
- *Criminal Damage Act (1974)* – HM Government
- *Football Offences Act (1991)* – HM Government
- *Reporting of Injuries, Diseases & Dangerous Occurrences Regulations (1995)* – Health & Safety Executive
- *Licensing Act (2003)* – HM Government

The Club/Charity is also governed guided by various criminal offences.

The Club/Charity is fully committed to ensuring that the best practice recommended by these legislations, policies and guidelines is implemented at all times.

In keeping with these commitments, the Club/Charity also recognises its responsibility to maintain regular dialogue with the Premier League, the FA, Northumberland FA, Northumbria Police, the Newcastle Safeguarding Children Board and the Newcastle Safeguarding Adults Board as well as other support services such as North East Ambulance Service and Tyne & Wear Fire and Rescue Service. By working closely with such agencies, it is hoped that the Club can adopt an effective multi-agency approach to Safeguarding.

Scope

There are specific scenarios in which the Club/Charity will most likely engage with vulnerable groups in its capacity as a provider of services on identified premises. These are:

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- First Team, Under 21 and Academy matchdays
- Functions and Events at St James' Park
- Stadium Tours of St James' Park
- External Off-site events run by the Club, Academy or Foundation

The Safeguarding considerations associated with each scenario are discussed in the remainder of this policy.

The most common premises to which this policy applies include:

- St James' Park
- Whitley Park (owned by Northumberland FA)
- NUFC Training Ground
- NUFC Academy

This is not an exclusive list and this policy may be applied to other venues as deemed appropriate.

Matchdays

It has been identified that there are several points to consider regarding the engagement of children, young people and vulnerable adults with the Club/Charity on matchdays held at St James' Park, Whitley Park, the Training Ground or the Academy.

Spectators under 12 years of age – Home team supporters

Whenever children under 12 years of age attend a match as spectators they must be accompanied by a responsible person aged 16 years or over, who must be present for the full duration of the event. This is applicable to all venues listed above.

When tickets for a match are purchased by a person aged 16 years or older for themselves and a child/children under 12 years, the Club/Charity acknowledges that these tickets must be allocated next to each other in the same area of the stadium. Under no circumstances will the tickets be allocated for separate areas of the stadium. This applies to the sale of home and away tickets.

In the event of a child under 12 years entering into the stadium via a turnstile and their accompanying young person or adult is refused entry, then the Club/Charity recognises its duty of care to ensure both parties are immediately reunited outside of the stadium, and will be denied entry until the problem has been resolved. Under no circumstances will they be separated.

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Spectators under 12 years of age – Away team supporters

Age restrictions in relation to children's admittance to matches apply to both home and away team supporters. As a result, the Club/Charity acknowledges it has a responsibility to inform the away team box-office of these restrictions to allow such information to be conveyed to fans at the point of sale. Having shared such information at the point of sale, the Club then reserves the right to challenge children regarding their age at the point of entry.

In the event that an away team supporter aged under 12 years of age does attempt to gain entry to a match without an accompanying person aged over 16 years of age, the child may be denied the opportunity to spectate the game.

In line with the Club's Safeguarding Children Policy however, the Club/Charity does acknowledge a duty of care for the child and will not turn away the supporter or leave the child alone without support. In such circumstances, a dynamic risk assessment will be undertaken at the time of the occurrence and appropriate action will be identified. Such action *may* include a form of appropriate supervision for the child (in an appropriate location and by suitable qualified staff members) or referral to an appropriate supporting agency such as the police or social care services.

In all circumstances, unless photographic proof of age is supplied, club reserves the right for its staff to make a judgement of age based upon visual appearance.

Infants and Babes in Arms

The Club/Charity recognises that parents may wish to bring very young infants and babes in arms to matches as spectators.

Due to the noise and crowds at a football match, particularly when being held at St James' Park, the Club/Charity considers that it may be inappropriate for parents to bring infants into the stadium. However, it also respects the rights of a parent to make such a decision and as a result will not stop a parent bringing an infant or babe in arms if they choose to do so.

It is acknowledged that the responsibility for that infant or baby's welfare, comfort and safety lies entirely with the parent at all times during the match and their time on the venue's footprint.

Where parents wish to bring an infant or baby to a match held at St James's Park, a ticket for that infant or baby must be purchased. Such a ticket will be charged at a concessionary 'junior ticket' rate. Baby changing facilities are available in a number of toilets and emergency First aid rooms around the stadium.

Due to the logistical and structural differences between St James' Park and Whitley Park and the Academy, the Club/Charity will not charge for Babes in Arms attending games at Whitley Park or the Academy.

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Vulnerable adult spectators

The Club/Charity also recognises that some adult supporters that attend matches as spectators may be identified as a 'Vulnerable Adult' by the definition and considerations identified in the Club/Charity's Safeguarding Vulnerable Adults Policy.

In the event of a Vulnerable Adult attending a matchday at St James' Park, Whitley Park or the Academy, subject to certain terms and conditions being met, the Club agrees to provide a ticket to the match for an appropriate carer free of charge as way of ensuring a reasonable adjustment is made to its services.

It should be identified however, that in doing so, the club expects the primary role of any carer to be to look after the welfare and needs of this vulnerable adult. The carer will be required to sit next to the Vulnerable Adult they are caring for and expected to meet the needs of the Vulnerable Adult throughout the course of the match.

When applying for a free carer ticket, proof of entitlement will be expected to be evidenced to the Club's ticketing box office. The Club/Charity reserves the right to remove such entitlement should satisfactory proof of entitlement not be provided or if this entitlement is abused.

Whilst the Club/Charity accepts a duty of care for Vulnerable Adult spectator whilst they are on the venues footprint, this duty of care is not considered to be greater than the duty of care the Club/Charity accepts for all spectators that attend matches and as a result the Club/Charity cannot be expected to provide specialist care to vulnerable adults if they so require it.

Club/Charity staff do not possess the relevant expertise to act as a carer for any vulnerable adult and as a result will not be expected to accept such responsibility. In the event of an emergency, the emergency services will be called.

Concessionary tickets

As a reasonable adjustment to the different circumstances junior supporters (aged 18 years and under) face, the club agrees a discounted rate on ticket prices for any fan aged under 18 years of age.

This discounted rate varies depending on game but can be anything up to 50% discount on standard ticket price.

As outlined above, the club will also offer a free ticket for an appointed, suitable carer for a Vulnerable Adult, subject to proof of entitlement.

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Family Area

In line with our commitment to creating a family friendly experience at games, where matches are staged at St James' park, a designated area is allocated to family groups and junior supporters.

Almost 15% of the stadium capacity (8,100 seats in the Milburn stand, level 7) has been allocated to family groups and junior supporters. The availability of this family enclosure relies on the Milburn Stand being open to supporters on the day of any match.

In an effort to attempt ensure this family area is as appealing as possible to young people, within the concourse areas of the Family area, the Club/Charity endeavor to provide kiosks that serve food and soft drinks and forms of activities, decoration and facilities that appeal to junior supporters.

In line with the Club's Safeguarding Children Policy, all stewards operating within this family area are subject to an Enhanced DBS check and have received appropriate Safeguarding training as part of their Stewarding Training course.

Licensed bar areas

When matches are played at St James' Park, due to the range of services offered on matchdays, it has been identified that there may be potential for children or young people to access licensed bar areas of the venue unaccompanied if support measures are not implemented by the Club/Charity. As a result, this policy identifies that on matchdays and in accordance with the Licensing Act (2003), children and/or young people under 16 years of age are not be permitted in licensed bar areas of the stadium, unless they are accompanied by a person aged over 16 years of age for the full duration of time they are present in that licensed bar area.

At St James' Park, the licenced bar areas within the stadium footprint have been broadly identified as the sports bars areas and hospitality suites within the stadium.

Specifically, these areas can be named as:

- The Bamburgh Suite
- The Centenary Suite
- The Chairman's suite
- Club 1892
- Club 206
- Corporate Hospitality Boxes
- The Gallowgate Suite
- The Joe Harvey Suite
- The Magpie suite
- The Milburn Sports Bar

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- The Milburn Suite
- The Moncur Suite
- Nine Bar
- The Park Grill
- The Partner's Suite
- The Puma Suite
- The Sports Direct suite
- The Sports Bar
- The Sir Bobby Robson suite
- The Terrace Bar
- The Wonga Suite

For matches held at Whitley Park, it has also been identified that the same potential for children or young people to access licensed bar areas of the venue unaccompanied exists. As a result, this policy also identifies that on matchdays held at Whitley Park and in accordance with the Licensing Act (2003), children and/or young people under 16 years of age are not permitted in licensed bar areas of the venue, unless they are accompanied by a person aged over 16 years of age for the full duration of time they are present in that licensed bar area.

At Whitley Park, the licenced bar areas within the venue footprint have been broadly identified as the sports bar area.

There are no licensed bar areas at the Academy and as a result, no such restrictions of this nature have been placed on this venue.

It should also be noted that there are no restrictions placed on vulnerable adults accessing the licensed bar areas of the venues mentioned (if applicable) on matchdays. However, in line with the Club/Charity's approach to accommodating vulnerable adult supporters, the Club/Charity expects an allocated carer to chaperone a vulnerable adult to and from any licensed bar areas and ensure the needs and welfare of the vulnerable adult are met whilst they are present in the licensed bar area.

Ejection from the stadium of spectators over 12 years of age

If a child or young person aged 12 years or over has entered the match venue (St James' Park, Whitley Park or the Academy) unaccompanied, the Club/Charity reserves the right to treat them in the same manner as other spectators, including ejecting them from the venue if they are deemed to have behaved inappropriately. For matches at St James' Park, as the stadium is a Designated Football Ground, they may also have breached the Ground Regulations. Any child who has breached the Ground Regulations may be liable to ejection in accordance with the club ejection policy or arrest by the Police if a crime has been committed.

All stewards and steward supervisors responsible for ejecting supporters under 18 years of age have been trained to do so appropriately. Specifically, this includes engaging in appropriate

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physical contact if necessary, using appropriate language whilst interacting with supporters aged under 18 and giving consideration to the environment into which supporters are being ejected.

Whilst the Club/Charity has no statutory duty of care or responsibility for any child or young person ejected from the stadium, should the Safety Officer or Safeguarding Manager have any concerns for the well-being or welfare of the child or young person following an ejection, then appropriate support action will be implemented to ensure the safety of that child. This may include (but is not limited to) arranging for trained staff to supervise the child whilst the child's parents are contacted or contacting the Police and/or Social Services respectively. Action taken is dependent on circumstances and each case will be handled independently and accordingly.

Ejection from the stadium of spectators under 12 years of age

If a child is aged under 12 years of age is identified as having behaved inappropriately, they may be liable to ejection in accordance with the club ejection policy. Due to the age of the child in question, any such child should be accompanied by of a responsible person aged 16 or over. As a result, where a child is identified as having behaved inappropriately or as being in breach of Ground Regulations (where the match is held at St James' Park), both the child and accompanying responsible person will be asked to leave the match venue.

Likewise, if an adult who is accompanying a child aged 12 or under is asked to leave, the child will be asked to leave the stadium alongside the adult who has been ejected. Under no circumstances should the two parties be separated in the event of an ejection.

In the rare occurrence that a child under 12 years of age has gained access to the stadium without the accompaniment of a responsible person aged 16 or over, the club reserves the right to eject the child from the stadium if such a course of action is identified as necessary. This will be done in line with the club's ejection policy.

As is the case with spectators aged over 12, stewards and steward supervisors responsible for ejecting supporters under 12 years of age have been trained to do so appropriately. All stewards are expected to understand how their actions and interactions should differ dependent on the age of the child or young person being dealt with.

Again, whilst the Club/Charity has no statutory duty of care or responsibility, for any child or young person ejected from the stadium, should the Safety Officer or Safeguarding Manager have any concerns for the well-being or welfare of the child following an ejection, then appropriate support action (outlined above) will be implemented to ensure the safety of that child.

Lost and found children

On notification of a lost or found child, a steward or other employee of the club, will immediately report this matter to their nearest Steward Supervisor who, in turn, will inform the Match Control centre for the game of the situation via radio or emergency telephone.

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At the point of notification, the steward or steward supervisor will also, in line with their training, take appropriate action as to;

- Create a dynamic point of safety for the child (preferably near to an emergency telephone which can be used to report the incident) within the open concourse area
- Reassure the child, parent/guardian or adult reporting the incident,
- Attain details of the child's name, address, physical appearance and
- Record circumstances of them becoming lost,
- Report such information to the Matchday Safety Officer and/or the Matchday Safeguarding Officer.

The Safety Officer and/or the Safeguarding Manager will act to inform the Steward Supervisor of the next course of action and who shall be appointed as the responsible person for the incident. The appointed responsible person will co-ordinate initial enquiries at the scene or inside the match venue.

Should there be a delay or difficulty in reuniting the child or young person with their parent, guardian or responsible adult, or in finding the child or young person and there is cause for concern about their safety and welfare, then the police may be notified and assigned responsibility for carrying out further enquiries.

This protocol is applicable to all venues outlined previously.

Search policy

Premier League Ground Regulations state that all persons entering the St James' Park for the purpose of watching a football match acknowledge the club's right to search any person entering the stadium and to refuse entry to, or eject any person refusing to submit to a search.

However, in accordance with Safeguarding 'Best Practice' guidelines, the club does not actively search anyone aged under 18 years of age or anyone who any adult considered as vulnerable and in requirement of care from an allocated carer.

In the event stewards suspect either children or vulnerable adults are attempting to bring banned, inappropriate or unsuitable materials into a match venue, alternative methods of investigation will be adopted. Typically this will include a request for a child to 'turn out' their pockets and declare any materials or a carer searching the vulnerable adult on the Club/Charity's behalf.

Should a child or vulnerable adult refuse to co-operate with such alternative methods, the Club refuses the right to refuse them entry to the game.

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Functions and Events at St James' Park

Frequently the listed licensed bar areas and other function rooms within St James' Park are used to host private events and functions, often unrelated to the club's primary function as a football club. Due to such functions and events taking place on club owned premises the Club/Charity, as a result, work to ensure the Safeguarding and Welfare needs of those attending any such functions or events are met in full.

In relation to such circumstances, the club has identified the following as areas of concern;

Attendance at functions and events unaccompanied

In alignment with Matchday protocol, this policy identifies that all children under the age of 12 attending a function or event on a non-matchday must be accompanied by a responsible person aged over 16 years of age. The child must be accompanied for the duration of the function or event and must leave the premises of the function or event by 11.30pm.

Where functions and events are hosted within one of the named licensed bar areas of St James' Park and the function or event includes access to the serving of alcohol to attendees, no child or young person aged under 16 years of age is permitted to be at the function or event bar area unaccompanied by an adult (someone aged over 18 years of age).

First Aid

In order to ensure the welfare of all persons attending a function or event at St James' Park, the Club will ensure that there is always a qualified first aider or an emergency aid trained member of staff present on site. Such members of staff understand the responsibilities of this role and work to actively uphold the wellbeing of all in attendance.

Stadium Tours of St James' Park

Due to the status St James' Park holds within the city of Newcastle upon Tyne, it is frequently visited by groups of people wishing to take a tour of the stadium. The club operates regular guided tours of St James' Park which are led and coordinated by trained members of staff. Tours are not permitted without the accompaniment of an employed guide.

Tours are organised broadly into two categories, Public and Private tours. Public tours run on specified days at specified times, and whilst subject to change and conditions, are generally open access tours available to members of general public. In contrast, private tours are organised independently by pre-arranged groups.

The club has identified the following areas for consideration in terms of safeguarding stadium tours;

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Unaccompanied children taking tours

The club has identified that, in keeping with the outlined matchday access protocol outlined previously in this policy, children under the age of 12 are not permitted to undertake a guided tour of the stadium without being accompanied by a responsible person aged 16 or over. This protocol is irrespective of whether the tour is a public or private tour.

Groups of children and staff ratios

In order to maintain best practice and provide a service of high quality, it has been identified that tours should operate with a strict tour guide to participant ratio of 1:20, meaning one tour guide is able to chaperone a group of no more than 20 participants. It is acknowledged that this may be inclusive of accompanied children, children aged over 12 years of age and vulnerable adults with carers.

In the event of a group consisting of more than 20 participants a second guide will be recruited to support the tour. This is irrespective of how the group is made up.

Tour guides and administrators reserve the right to assess the requirements of each tour independently and may choose to reduce this 1:20 tour guide to participant ratio if they feel necessary. In such an event, extra resources will be allocated to ensure the smooth running of the tour.

If a single tour group consists of 10 or more unaccompanied children or young people (aged 12 years or over), the tour guide to participant ratio should be altered to accommodate the additional Safeguarding requirements that will be placed on the tour guide managing the group. As a result, in such a scenario, tour guides will operate a 1:10 tour guide to participant ratio.

Where large groups of children have specifically organised to attend a tour, special supervision arrangements should be made. In such a scenario, at the point of enquiry or booking the tour, the tours administration staff will request that the group themselves organise for the tour to be supported by a number of responsible adults who can appropriately supervise the large number of children in attendance. When an adult to participant ratio of 1:8 is achieved and maintained then the tour can proceed. If such a ratio cannot be accomplished, the tour will not proceed.

It may be possible to organise additional guides to support tours if such resources are available and such allocation of resources does not negatively impact on the needs of the Club/Charity's business. If such additional resources are identified as required but are unavailable, the tour will not proceed.

1-1 tours with children and young people

It has been identified that a potential complex scenario exists whereby a child or young people aged under 18 years wishes to attend a public tour but is the only person booked on to the tour.

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In such a scenario, the first preference of the Club is to cancel that particular public tour and request the child or young person returns at another specified time.

However, if this is not possible or it is deemed not in the best interests of the Club to take this course of action, the tour may be run as long as a number of support procedures can be implemented. These include arranging a minimum tour guide to participant ratio of 2:1 and a risk assessment being undertaken and accompanying action plan being implemented. Tour administration staff and tour guides are aware of the need for such support procedure and as a result will endeavor to organise such arrangements should the scenario arise.

Vulnerable Adults attending tours

Vulnerable adults are most welcome to attend Stadium Tours of St James' Park and there are no restrictions on their attendance.

In line with the Club/Charity's policy on ticketing for matchdays, a reasonable adjustment will be made for carers assisting a vulnerable adult's attendance in the form of a free ticket to for the tour.

However, in line with match day protocol, the carer accompanying a vulnerable adult is expected to ensure the welfare and needs of the vulnerable adult are met at all times and must ensure they accompany the vulnerable adult for the duration of the tour.

Club/Charity staff are not expected to act as carers for vulnerable adults as part of their employment.

External Off-Site Activities

Occasionally the Club/Charity will organise for activities to take place externally from the recognised premises of the club (those identified in this policy).

In such scenarios, the organisers of the activity will endeavor to obtain and clarify the safeguarding procedures for the areas outlined in this policy as well as any other relevant safeguarding procedures for that venue and share any relevant information or protocols with staff facilitating the event.

Should the venue not have adequate Safeguarding policies or procedures in place or such policies and procedures are deemed below the standard of the Club/Charity's, the activity organisers will, as best practice, share the Club's core safeguarding policies and procedures with the venue and request they be adopted by all involved for the duration of the event.

The Club/Charity have also identified that there may be programmes or events organised at external off-site premises that require the Club/Charity to accept sole responsibility for children, young people and vulnerable adults.

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In such situations, the Club/Charity will risk assess each situation independently and will produce and implement an appropriate action plan and support procedure that ensure the principles of this policy and the Club/Charity's Safeguarding Children and Safeguarding Vulnerable Adults policies are maintained.

The sharing of this risk assessment and action plan will be shared with the external off-site premises by the activity organisers, in line with best practice guidelines.