



Swindon Town FC
Community Foundation

Swindon Town FC **Community Foundation**
Football in the Community

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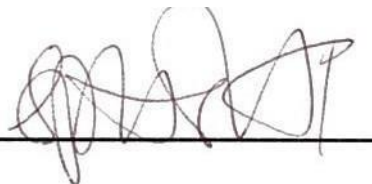
Swindon Town FC Community Foundation

Adults at Risk Policy

Latest review: June 2023

Date of next review: June 2024

This policy and set of procedures will be reviewed on an annual basis, or sooner should any major incident, organisational or legislative change arise.

Signed 

Shane Hewlett (Designated Safeguarding Officer)

Signed 

Kirsteen Fraser (Senior Safeguarding Manager)



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1. Vulnerable Adults Policy and Procedures Introduction

Swindon Town FC Community Foundation are committed to football being inclusive and providing a safe and positive experience for everyone involved in the game.

Whilst it is hoped that the law, the Respect programme, Swindon Town FC Community Foundation Equality Policy and positive approaches to training and education are sufficient to safeguard all adults in football, Swindon Town FC Community Foundation recognises that it has a responsibility to safeguard Vulnerable Adults from abuse and harm and to respond where abuse and harm are perceived to have occurred.

This Policy will seek to provide guidance as to how to prevent harm, give clarity on how to report harm, to ensure investigation into harm and to respond to the outcome of such investigations in such a way as to reduce the risk of further harm to the individual Vulnerable Adult and to other Vulnerable Adults who may be affected in the future.

Swindon Town FC Community Foundation recognises that the terms 'Vulnerable Adult', 'abuse' and 'harm' are open to interpretation and challenge but for the purpose of this Adults at Risk Policy, they will be defined as follows:

'Adult at Risk', and 'Vulnerable Adult' shall be defined as:

'A person aged 18 or over who is or who may be in need of community care services by reason of mental or other disability, age or illness: and who is or who may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or exploitation'

(1) Abuse shall be defined as:

'A violation of an individual's human and civil rights by any other person or persons.'

(2) Harm shall be defined as:

'Ill treatment and forms of ill treatment (including sexual abuse and forms of ill-treatment which are not physical) and also the impairment of, or an avoidable deterioration in, physical or mental health'



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and the impairment of physical, intellectual, emotional, social and behavioral development’.

(3) ‘Harm’ may be caused by acts of commission and acts of omission.

The responsibility taken by this Policy is to:

- Safeguard the welfare of Vulnerable Adults in football by protecting them from any significant physical, sexual and emotional harm and from neglect, bullying, and financial harm within the game. This may include training and codes of practise amongst other strategies for reducing risk.
- Safeguard the welfare of Vulnerable Adults in football by making use of such vetting as is available to Swindon Town FC Community Foundation when seeking to establish suitability for a new pre-existing role with Vulnerable Adults in football.
- Report to the appropriate authorities any concerns about abuse or harm to Vulnerable Adults whether this occurs within the game or elsewhere and whether this be a criminal offence or other concern. The appropriate authorities may be internal or external to the game. This will include identifying reporting frameworks and developing guidelines for reporting.
- Ensure appropriate investigations and responses to concerns about abuse or harm within the game including football sanctions as appropriate. This will include work in partnership with the Police and other statutory agencies charged with investigation and responding and with the Vulnerable Adult who is believed to be risk or believed to have been harmed.
- Following such investigations, act to put appropriate safeguards in place to safeguard the Vulnerable Adult in the future and to reduce the risk of harm to other Vulnerable Adults in the game.
- Report when appropriate to the Independent Safeguarding Authority anybody in the game who is believed by Swindon Town FC Community Foundation to be risk of harm to Vulnerable adults.
- Seek to develop internal skills and knowledge based on research, Government guidance and learning from experience.
- Review the Policy annually.



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Disciplinary action/suspension may be taken where a staff member:

- Fails to comply with the Foundation's Safeguarding Processes.
- Has been barred from engaging in regulated activity to Vulnerable Adults.
- Has been convicted of, or made the subject of caution for a serious sexual, violent offence, or any other offence that the Foundation believes to be relevant to the care of vulnerable adults.

The purpose of this policy is to ensure that when harm has occurred, a prompt reaction is facilitated.

2. Adult Abuse

What is Abuse?

For the purpose of the Safeguarding Adults Policy and Procedures the term abuse is defined as:

"A violation of an individual's human and civil rights by any other person or persons which results in significant harm." (See *No Secrets: Guidance on Protecting Vulnerable Adults in Care, Department of Health and Social Care, 2000*)

Abuse is about the misuse of power and control that one person has over another.

Intent is not an issue at the point of deciding whether an act or a failure to act is abuse: it is the impact of the act on the person and the harm or risk of harm to that individual. A number of abusive acts are crimes and informing the police is a key consideration.

Significant Harm Refers to:

- Ill treatment (including sexual abuse and forms of ill treatment which are not physical).
- The impairment of, or an avoidable deterioration in, physical or mental health.
- The impairment of physical, intellectual, emotional, social or behavioral development.

3. Types of Abuse

There are different types of abuse:

Physical: 'Use of force which results in pain or injury or a change in a person's natural physical state' or 'the non-accidental infliction of physical force that results in bodily injury, pain or impairment'. It includes hitting, slapping, pushing, kicking, and misuse of medications, restraint or inappropriate sanctions.

Sexual: Examples of sexual abuse include the direct or indirect involvement of an adult at risk in sexual





activity or relationships which they do not want or have not consented to. It includes rape and sexual assault or sexual acts to which the person has not, or could not consent and/or was pressured into consenting. It also includes responding to sexualised behavior of the person at risk which may be a feature of their condition.

Psychological/Emotional: Behavior that has a harmful effect on the person's emotional health and development, or any form of mental cruelty that results in mental distress, the denial of basic human and civil rights such as self-expression, privacy and dignity. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation from supportive networks.

Financial/Material Abuse: Use of a person's property, assets, income, funds or any other resources without their informed consent or authorisation. It includes theft, fraud and exploitation. It is abuse to influence a person at risk to obtain benefit from his will, property, inheritance, possessions or benefits.

Neglect and acts of omission: Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g. medication, adequate nutrition and heating.

Discrimination: Discriminatory abuse exists when any of the statutory discriminatory criteria are applied adversely in relation to the values, beliefs or culture of any individual by a misuse of power that denies opportunities to some groups or individuals. It includes adverse treatment on the grounds of age, disability, gender, marital status, race, religion or belief.

Institutional: Mistreatment or neglect of an adult at risk by a regime, or individuals within settings and services, that adults at risk live in or use. Such abuse violates the person's dignity, resulting in lack of respect for their human rights.

Bullying/hate crime/harassment: either by individuals or systemically.

4 Related issues





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Self-neglect: This does not come under the scope of these procedures, but concerns should be reported to the project manager, Shane Hewlett DSO or Head of Safeguarding.

Hate crime: Defined by the Police Service as any incident that is perceived by the victim, or any other person, to be racist, homophobic, trans-gender-phobic or due to a person's religion, belief, gender or disability. It also includes age discrimination. The police use this definition as one which is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

Prevent

Preventing Radicalisation are vulnerable to extremist ideology and radicalisation. Protecting Adults at risk from other forms of harms and abuse, protecting Adults at risk from this risk should be a part of the STFCCF safeguarding approach. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause. PREVENT - Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on organisations to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty. Paragraphs 57-76 of the revised Prevent duty guidance: for England and Wales is specifically concerned with organisations (but also cover childcare) The statutory "Revised Prevent Duty Guidance for England and Wales" (for organisations) summarises the requirements in terms of four general themes: There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in Adults at risk's behavior, which could indicate that they may need help or protection. Staff should use their judgement in identifying Adults at risk who might



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be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. STFCCF designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral. The Prevent Duty STFCCF are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. The Prevent duty should be part of STFCCF’s wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales. 31 of 44 The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges. Child Criminal Exploitation: County Lines Criminal exploitation of Adults at risk and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit Adults at risk and young people and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are periods of absence from STFCCF when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.



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Abuse in Domestic Settings: Domestic violence is defined as ‘any incident of threatening behavior, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members regardless of gender or sexuality’. (Family members are defined as mother, father, son, daughter, brother, sister and grandparents, whether directly related, in-laws or step-family.) The relevance of this is that the Trust may be in position to inform the relevant authorities so that they may take steps to protect the adult at risk where abuse has taken place or is likely to take place.

Abuse by Another Adult at Risk: Where the person causing the harm is also an adult at risk, the safety of the person who may have been abused is paramount.

Allegations Against Carers Who are Relatives or Friends: There is a clear difference between unintentional harm caused inadvertently by a carer and a deliberate act of either harm or omission, in which case the same principles and responsibilities for reporting to the police apply.

Abuse of Trust: A relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity. There is a particular concern when abuse is caused by the actions or omissions of someone who is in a position of power or authority.

Abuse by Adults at risk (under 18s): If a child or Adults at risk is/are causing harm to an adult at risk, this should be dealt with under the Safeguarding Adults policy and procedures, but will also need to involve the local authority Adults at risk’s services.

Transitions (Care Leavers): The Foundation will ascertain whether robust joint working arrangements between Adults at risk’s and adult services have been put in place to ensure that the needs of Adults at risk leaving care are addressed as they move to adulthood and become or continue to be involved in Foundation activities.

5. Where Abuse May Occur

Abuse can take place in any context and can occur anywhere, including where the person lives, in someone else’s house, nursing or care home, hospital, workplace, public places and other place assumed as being safe.



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Harm may occur anywhere in a Swindon Town FC Community Foundation activity or it can be reported to a Foundation representative (or indicative signs noticed) when it has occurred outside a Foundation activity.

6. Who can the Abuser be?

Adults at risk may be abused by a wide range of people including:

- Relatives and family members
- Professional staff, volunteers and paid care workers.
- Other service users
- Neighbours
- Friends and associates
- People who deliberately exploit vulnerable people
- Strangers.

Abuse exists in various forms and can be perpetuated by one or more people.

Whatever the abuse or the setting, abuse is not acceptable and a violation of a person's basic human rights. Adults participating in Foundation activities have the right to enjoy a safe environment free from abuse and neglect. If the Foundation becomes aware of any risk of abuse from these sources, it will take steps to inform the appropriate authority.

7. Reporting Procedure/Raising an Alert

The procedures in this section detail how to respond to an alert.

An alert is a concern that an adult at risk is or may be a victim of abuse or neglect.

An alert may be a result of a disclosure, an incident or other signs or indicators.

The primary responsibility of the Foundation is to ensure:

- Concerns and any relevant information about possible abuse are passed to police or adult social care without delay.
- The safety and well-being of the adult at risk whilst under its supervision.



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Role of Staff

All personnel and volunteers have a duty to act in a timely manner on any concern or suspicion that an adult who is vulnerable is, or is at risk of, being abused, neglected or exploited and to ensure that the situation is assessed and investigated.

Staff are in the frontline of preventing harm or abuse occurring and empowering the person at risk to take action where concerns arise. The steps are:

- Act to protect adult at risk.
- Deal with immediate needs.
- Report to line manager.
- Consider reporting to the police, if a crime.
- Record.

7.1 Concerns

A concern may be:

- a direct disclosure by the adult at risk
- a concern raised by staff or volunteers, others using the service, a carer or a member of the public
- An observation of the behavior of the adult at risk, of the behavior of another person(s) towards the adult at risk, or of one service user towards another.

The member of staff should discuss his concern with his line manager. If the concern involves the line manager, then it must be communicated to Shane Hewlett DSO or Kirsteen Fraser Safeguarding Senior manager.

7.2 Disclosure by an Adult at Risk

If an adult experiencing abuse or neglect speaks to you about this, follow procedure.

- Remain calm: LISTEN, RECORD AND REPORT.
- Listen, observe and stay calm
- Get a clear and factual picture of the concern.
- Keep response short, simple and gentle
- Keep questions to a minimum.
- Be clear and say that you need to report what they have told you.
- Explain that you have a duty to tell your manager and that the reported concerns will be shared with others who could have a part to play in protecting the individual.
- Seek consent to share the information and take action. "What you are saying is important, so I need





to talk to someone about it”

- Reassure the person that he will be involved in decisions about what will happen.
- Tell him what you will do next and with whom the information will be shared (e.g. Line Manager, DSO,SSM). “I’m going write down/record (mobile phone recording devices can be useful) what you’ve just told me and speak with...”.

If the individual has specific communication needs, provide support and information in a way that is most appropriate:

- Do not give promises of complete confidentiality.
- Do not be judgmental or jump to conclusions
- Keep an open mind.
- Do not asking leading questions.
- Do not discuss with the person alleged to have caused harm.
- Do not destroy any evidence.

Important: If an adult starts disclosing something but does not continue when they are told that it cannot remain confidential, this needs to be raised as a concern with your line manager and DSO. You can still support the adult by directing them to helplines and websites that can offer support (see Contacts).

If you hear about an incident of abuse from a third party (this is when someone else tells you about what they have heard or seen happen to a vulnerable adult at risk), encourage them to report the facts of what they know or contact a Helpline.

Key points to remember about disclosure:

- Many incidents of abuse or crimes only come to light because the abused person tells someone.
- The person may not appreciate the significance of what they are sharing. They may not realise or accept they are being abused.
- Disclosure may take place many years after the actual event or when the person has left the setting in which they were afraid.

Allegations of Previous Abuse

Allegations of abuse may be made some time after the event. Where such an allegation is made, the Foundation will follow the procedures as detailed in this section and report the matter to appropriate Adult Services and the police.





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If the allegation involves a member of staff, the EFL Safeguarding Lead Joe Wyatt and the FA will be informed by the SSM. This is because other adults at risk, either within or outside sport, may be at risk from this person.

If you suspect abuse:

- Act to protect the adult at risk and take steps to ensure that the adult is in no immediate danger.
- If possible, make sure that other service users are not at risk.
- Seek the views/wishes of the adult at risk and what outcomes he wants to achieve.
- Seek consent to share information: An adult's legal right to consent to the sharing of his personal data marks the fundamental difference between approaches in safeguarding adults and safeguarding Adults at risk .
- Make notes or record on your mobile phone, if you have one.
- Report the abuse to your line manager; or in his absence, Shane Hewlett DSO; or Kirsteen Fraser SSM.

Record the event – use the Incident Form (*See Swindon Town FC Community Foundation Safeguarding Adults at risk and Vulnerable Adults in Sport, Physical Activity and Leisure 2020, Appendix 1*).

This information will be added to our 'my concern' reporting tool use by both Swindon Town FC and our Community Foundation

7.3 When to contact Emergency Services

Direct contact should be made with Emergency Services (dial 999) if:

- The adult is in need of urgent medical attention.
- A serious crime is has taken place or there is a need for an immediate police response to protect the adult at risk.

Otherwise, report to your line manager who will speak with Shane Hewlett DSO or Kirsteen Fraser SSM.

7.4 Evidence

The Police Service is responsible for the gathering and preservation of evidence to pursue criminal allegations against people causing harm and should be contacted immediately. However, the Foundation and staff can play a vital role in the preservation of evidence to ensure that vital information or forensics is not lost.

Preserving evidence:



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The first concern is to ensure the safety and well-being of the alleged victim. However, in situations where there has been or may have been a crime and the police have been called, it is important that forensic and other evidence is collected and preserved. The police will attend the scene, and the Trust and staff play an important part in ensuring that evidence is not contaminated or lost.

- Do not disturb the scene, clothing or victim if at all possible.
- Secure the scene, for example, lock the door.
- Preserve all containers, documents, locations, etc.
- Evidence may be present even if you cannot actually see anything.
- If in doubt contact the police and ask for advice. In situations of physical and/or sexual assault:
- Only observe what the complainant consents to show you and what is appropriate
- Do not touch what you do not have to. Wherever possible leave things as they are. Do not clean up, do not wash anything or in any way remove fibres, blood etc. If you do have to handle anything at the scene keep this to a minimum
- Do not touch any alleged weapons unless they are handed directly to you and keep handling to a minimum. Place the items/weapons in a clean dry place.
- Preserve anything that was used to comfort the person, e.g. a blanket
- The Police may organise a medical examination urgently.

Prior to the arrival of the police and medical examination:

- Ensure that no one has physical contact with either the abused person or the alleged perpetrator.
- Be aware that cross-contamination can easily occur.
- Preserve any bloodied items.
- Encourage victim not to shower or change clothing
- Even when the victim says he does not want police involvement, preserve items anyway as he may change his mind later.

7.5 Concerns about a member of staff

You may have concerns about a colleague's practice. If so, follow these stages:

- Talk to your line manager about the problem, or talk someone Senior, Shane Hewlett DSO or Senior Safeguarding Manager – a Helpline can also be contacted in confidence (see Contacts). To make a formal complaint: record the facts and make a complaint using the Foundation's Grievance Procedure.
- If you do not feel able to raise your concern with your line manager or other management (including your DSO, the Senior Safeguarding Manager and Head of Department), consult and follow Swindon Town FC Community Foundation Whistle-Blowing Policy.





- If you have tried all these stages or you do not feel able to raise your concern internally, you can raise your concern in confidence with the Safeguarding Department at the Premier League or contact Public Concern at Work for advice and guidance (*see Contacts, p. 14, and Swindon Town FC Community Foundation Whistle-Blowing Policy*).
- When reporting concerns about another member of staff you should understand that it is common for there to be a high degree of stress including feelings of guilt for having reported the matter. All information is treated with confidentiality. If you require anonymity, you should say so and explain why to the person to whom you have made the report.
- Do not discuss the concern with the person alleged to have caused harm.

Concerns arising from Complaints Concerns may arise from the Foundation's complaint and appeals procedures. Complaints by adults at risk, their carers or partner organisations about abusive behavior by staff or any behavior which constitutes poor practice, should be shared with the Shane Hewlett DSO who in turn will share with the Head of Safeguarding. Complaints are open to challenge through the appeals procedure.

If a complaint leads to a Safeguarding Adults investigation, the Foundation can decide to postpone or not to commence the complaints investigation if this would compromise the Safeguarding Adults investigation. The complainant would be informed of this course of action and the reason for this.

7.6 Record the Facts

Make a written record or a dictated telephone memo.

Keep your own notes along with a record of any names and an agency to which concerns were passed and record the time and date of any call, in case any follow-up is needed. This may be important as evidence of authorship.

Then, without delay, report to your line manager or Adult Safeguarding Officer/Head of Safeguarding.

Follow the same procedure if you have concerns about bullying or the behavior of a carer or another adult.

7.7 Informing a manager:





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Inform your line manager without delay or Safeguarding Officer/Head of Safeguarding. If a serious crime has been committed, contact the police first.

The line manager will inform the Shane Hewlett DSO or Head of Safeguarding, if not done so already.

Submit details to Shane Hewlett DSO within 4 hours. In turn, Shane Hewlett DSO will inform and liaise with the Kirsteen Fraser SSM who will take appropriate action. If Shane Hewlett is not available, report directly to Kirsteen Fraser.

Follow procedure and any advice you are given by the Safeguarding Officer, Senior Safeguarding Manager or any helpline contacted and maintain a record of this.

- Don't take any individual action or response outside this procedure.
- Ensure confidentiality – do not mention to other people.
- Seek support for yourself – speak your line manager, Head of Department or contact HR.

Once the allegation or suspicion of abuse has been reported to the Adults Safeguarding Officer, he/she will discuss with the Senior Safeguarding Manager.

8. Adults at Risk Flow Chart



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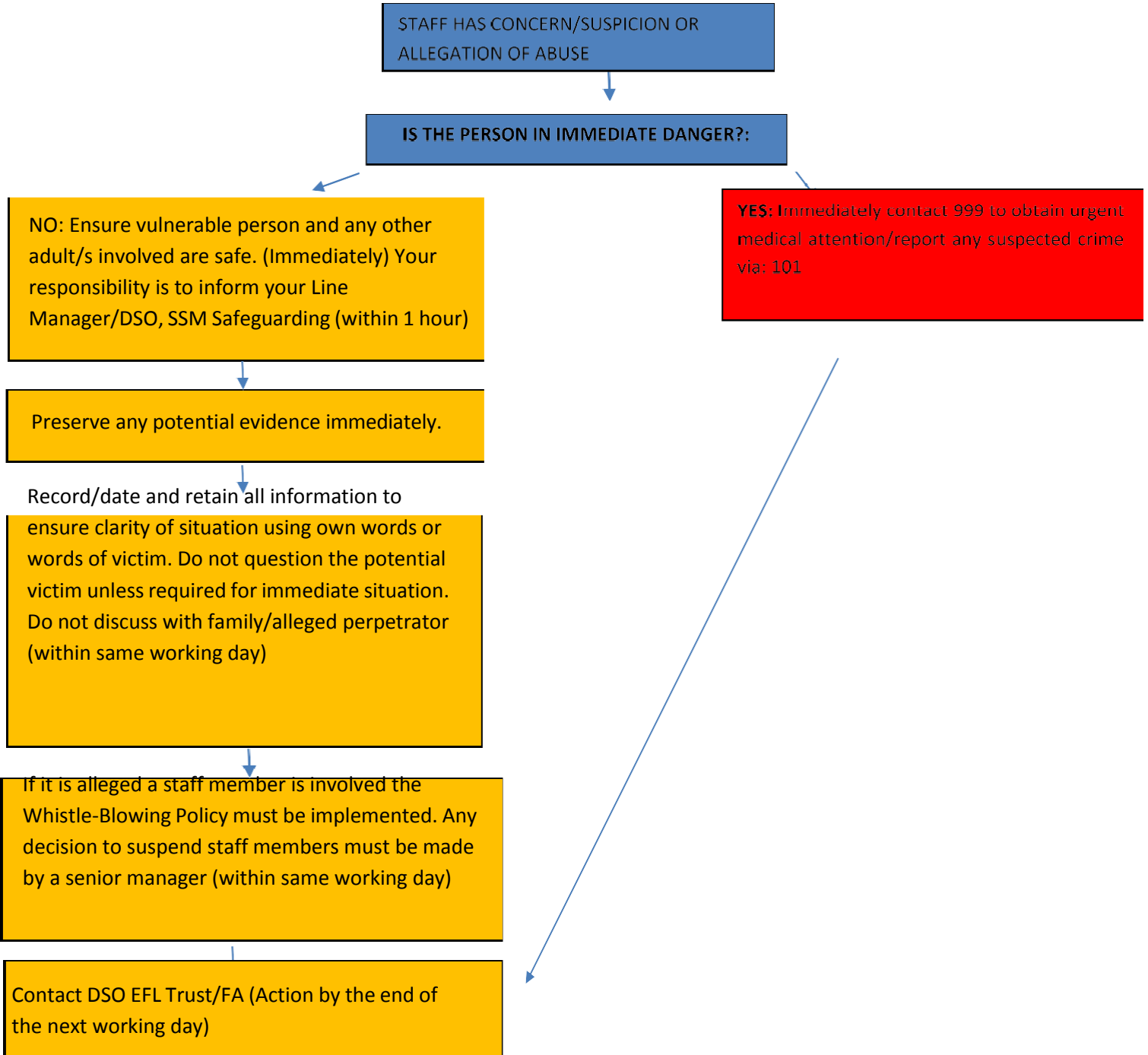


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9. Contacts for reporting abuse

- Download and complete a Multi-Agency Safeguarding Adults Referral Form:

https://www.swindon.gov.uk/forms/form/302en/multi-agency_safeguarding_adults_referral_form

- If the adult is in immediate danger, in need of medical attention or if a crime has been committed, contact the Emergency Services (Police and/or Ambulance Service).
- Contact one of the following agencies depending on the circumstances.

Adult safeguarding team, Swindon Borough Council

Tel: 01793 463555

E-mail: adultsafeguarding@swindon.gov.uk

(Office hours - Monday to Friday inclusive, 8.30am to 5.00pm).

Safeguarding adults investigation team, Wiltshire police

Tel: 01225 718093

(Office hours: Monday to Friday inclusive, 9.00am-5.00pm).

Out-of-hours emergency duty service

The emergency duty service is only for reporting safeguarding concerns that require urgent action out of normal working hours. Any other concerns should be forwarded to the Adult Safeguarding Team at adultsafeguarding@swindon.gov.uk, which will be processed the next working day.

Tel: 01793 436699

Police out-of-hours contact

Tel: 101



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Swindon Town FC
Community Foundation

Swindon Town FC **Community Foundation**
Football in the Community

Foundation Park, County Ground Lane, Swindon, Wiltshire SN1 2FD
Tel: 01793 421303 | **Mob:** 07966 305320 / 07919 112982

www.stfcfoundation.com

Kirsteen Fraser – Swindon Town FC Community Foundation Chairman – Senior Safeguarding Manager (SSM)	07780660410
Shane Hewlett – Assistant Head of Foundation - Designated Safeguarding Officer (DSO)	07919112982
DSO EFL Trust Jules Riley jriley@efltrust.com	01772 325838
Swindon Lado	01793 466849
The FA Safeguarding Team	0800 169 1863
NSPCC Whistle-Blowing helpline help@nspcc.org.uk	0800 028 0285

10. Equality, Diversity and Inclusion

Football is for everyone, it belongs to, and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member, volunteer or spectator. Swindon Town FC Community Foundation recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success.

We want our staff, coaches, volunteers and participants to reflect the diversity of the communities that we serve and influence. We aim to be a place where people can be free to be themselves no matter what their identity or background. We will ensure that equality is embedded in all of our activities, policies and decisions.

To report incidents and allegations of discriminatory actions or behavior, our equality, diversity and inclusion policy is available at www.stfcfoundation.com



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