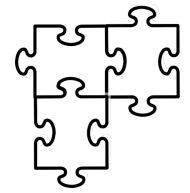




WEST BROMWICH ALBION FOOTBALL CLUB

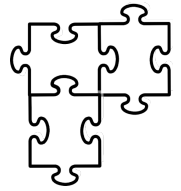
SAFEGUARDING ADULTS AT RISK POLICY





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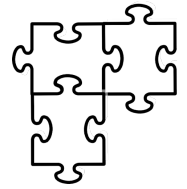
West Bromwich Albion Adult Safeguarding Policy

West Bromwich Albion Football Club, (WBA) it's staff, management and the board of directors acknowledge its responsibility to safeguarding all of those we engage with, work with or who attend any of our activities'. The club promotes the welfare of every child, young person and adult at risk who is engaged in our programmes and activities. We are wholly committed to working to provide a safe environment for all. The board and the Senior Safeguarding Group have reviewed the safeguarding adults at risk policy and procedures and fully endorse and adopt them.

Policy Statement

West Bromwich Albion Football Club is committed to ensuring that all adults attending or involved in Club programmes and activities enjoy a positive and respectful environment where they are actively protected from harmful experiences.

The policy recognises the Club's obligations and duty of care when working with adults at risk as set out in national legislation.



Definitions

For the purpose of this Policy the following definitions apply:

Adults at risk of harm:

A person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of 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 from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence.

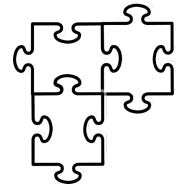
This list is not exhaustive. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Activity means any activity or series of activities, arranged by or in the name of WBA, for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

Staff means any person employed or deployed by WBA whether in a paid, voluntary, consultancy or third-party capacity. The Football Association ("The FA") is English football's governing body and in some cases referrals will be made to the FA and other statutory bodies.

Abuse is defined as a violation of an individual's human and civil rights by any other person or persons. It includes acts of commission (such as an assault) and acts of omission (situations where the environment fails to prevent harm). Abuse may be single act or omission or series of acts or omissions.

Capacity refers to an individual adult's ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make other decisions at other times. The starting point should be that the person has capacity to make a decision unless it can be established that they cannot.



Key Principles

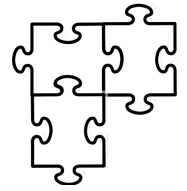
Self Determination:

Safeguarding adults can be complex. Adults have a right to self-determination and may choose not to act to protect themselves. Safeguarding adults means creating a culture that informs the adult and consults them on all decisions affecting them and works in partnership with them. As a principle safeguarding concerns should be discussed with the adult to establish their views and involve them in the safeguarding process. Occasionally however this may not be possible or safe. If in doubt seek advice from the Club Safeguarding Team or ann-craft-trust@nottingham.ac.uk

The Care Act:

The six principles of the Care Act apply. The principles work together:

- Empowerment: People being supported and encouraged to make their own decisions and informed consent
- Prevention: It is better to take action before harm occurs
- Proportionality: The least intrusive response appropriate to the risk presented
- Protection: Support and representation for those in greatest need
- Partnership: Local solution through services working with their communities
- Accountability: Accountability and transparency in delivering safeguarding



Types of Abuse

Self neglect:

Not looking after own personal hygiene, health or surroundings or hoarding. This happens away from football, but we might see the signs in football.

Domestic abuse:

Including psychological, physical, sexual, financial and emotional abuse. It also includes so called "honour" based violence. This happens away from football but we might see signs in football.

Discriminatory abuse:

Difference or perceived difference, particularly with respect to race, gender or disability or any of the other protected characteristics of the Equality Act.

Organisational abuse:

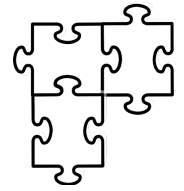
Including neglect and poor care practice within an institution, a specific care setting, their own home, or their football Club.

Physical abuse:

Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/ or that may harm them or application of inappropriate restraint measures.

Sexual abuse:

Adults with care and support needs can consent to sexual activity but can still be abused. This includes rape, Indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts or indecent exposure.



Types of Abuse

Financial or material abuse:

Including theft, fraud, internet scamming or coercion in relation to an adult's financial affairs or arrangements.

Neglect:

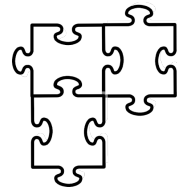
Ongoing failure to meet the basic needs of an Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks.

Emotional abuse:

Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Modern slavery:

Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.



Types of Abuse

County lines:

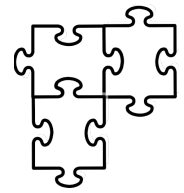
The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Adults at Risk. Gangs recruit Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

Cuckooing:

Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Grooming:

The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person. Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.



Types of Abuse

Discriminatory abuse:

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

Poor practice:

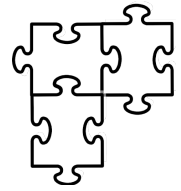
This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

Hazing:

Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

Peer-on-peer abuse:

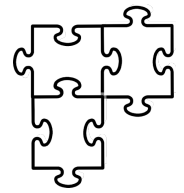
Children, Young People and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).



Signs & Symptoms of Abuse

Physical Abuse Indicators

- Injuries that are not explained satisfactorily
- Person exhibiting “untypical” self-harm
- Unexplained bruising to any part of the body, particularly collections of bruises which form a pattern which may correspond to the shape of an object or a person’s hand
- Unexplained burns especially on “unlikely” areas of the body, soles of the feet or palms of the hands
- Immersion burns.
- Rope burns and burns from an electrical appliance
- Unexplained fractures to any part of the body
- Unexplained cuts or scratches to mouth, lips, gums, eyes or genitalia
- Medical problems that go unattended
- Person flinches at physical contact or indicates that someone has threatened them with physical harm
- Sudden or unexplained urinary or faecal incontinence
- Reluctance to undress or uncover parts of the body
- Person may appear afraid of or “anxiously” try to avoid certain members of staff, family members or other people they know
- Injuries at different stages of healing
- Unexplained loss of hair in clumps



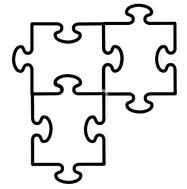
Signs & Symptoms of Abuse

Sexual Abuse Indicators

- Person discloses fully or partially that sexual abuse is occurring or has occurred in the past
- Person has urinary tract infections or sexually transmitted diseases that are not otherwise explained
- Person appears unusually subdued, withdrawn or has poor concentration
- Person appears reluctant to be alone with a person known to them
- Person has unusual difficulty in walking or sitting
- Person experiences pain, itching or bleeding in genital or anal area
- Bruising to thighs or upper arms
- Bites on various parts of the body
- Person exhibits significant change in sexual behaviour or outlook
- Person's underclothing is torn, stained or bloody
- A woman, who lacks the capacity to consent to sexual intercourse becomes pregnant

Psychological Abuse Indicators

- Untypical ambivalence, deference, passivity, resignation
- Person appears anxious, withdrawn, or fearful, especially in the presence of specific people
- Person appears to have a poor opinion of themselves
- Person appears to lack the opportunity to make choices or have adequate privacy
- Untypical changes in behaviour or routines of daily living
- Person appears isolated and deprived of social contact
- Person is unable to maintain eye contact having previously been able to



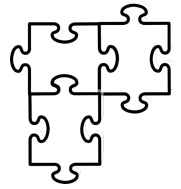
Signs & Symptoms of Abuse

Financial Abuse Indicators

- General lack of money especially soon after benefits are claimed
- Person lacks belongings or services they can clearly afford
- Inadequately explained fall in living standards
- Inadequately explained withdrawals from bank accounts
- Inadequately explained inability to pay bills
- Person does not appear to possess items which are known to have been purchased
- Recent acquaintances expressing interest in the person or their money
- Inadequately maintained financial systems, when a person's money is being managed by others, including a failure to produce receipts for major items
- Unexplained change in appointee ship or agent

Neglect Indicators

- Person lives in accommodation which falls below minimum practical standards
- Person has inadequate heating and/or lighting
- Person's physical appearance or condition is poor
- Person appears to be malnourished or dehydrated
- Person is observed to be left in wet clothing
- Failure to obtain health services when the person is ill
- Person does not appear to be taking the prescribed medication
- Callers/ visitors refused access to the person
- Person is exposed to unacceptable risks



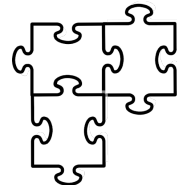
Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

Maintaining professional boundaries

Good safeguarding practices protects everyone. The EFL has produced a guide entitled "Safer Working Practice" a copy of which can be requested from Safeguarding@wbafc.co.uk Whilst every attempt has been made to cover a wide range of activities in this guide it is recognised that it cannot cover all eventualities. Staff are expected to make judgements about their actions and behaviour to secure the best interests and safety of the Adult at Risk in their care. All actions and behaviours should be guided by the principal that the safety and welfare of the Adult at Risk is paramount.

Responding to disclosures, safeguarding incidents and concerns

Indications that an Adult at Risk may be being abused can be difficult to recognise. Some signs and indicators may be explained by something plausible, for example, bereavement, sudden absence of a parent or carer, adolescence, or accidental injury. The presence of one or more signs and indicators should not be taken as proof that abuse has or is taking place, however Staff do not need evidence to report a concern. A person may be at increased risk of harm if you fail to report your concerns. No single person can have a full picture of an Adult at Risk's circumstances. Staff should never think that their concerns are not significant enough to act on. Staff should discuss their concerns with the Club Safeguarding Team. All disclosures, incidents and allegations must be taken seriously and responded to in line with the Club Safeguarding Policy and training. This includes allegations about non-recent abuse and allegations made against deceased individuals. Staff should contact the Club Safeguarding Team without delay if they witness an incident or come upon information pertaining to the safety and welfare of an Adult at Risk. Anyone can contact emergency services or make a referral directly to statutory agencies, particularly if they are concerned about an Adult at Risk's immediate safety, if they are having difficulty contacting a member of the Club Safeguarding Team or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately. The Club will fully support anyone who in good faith reports their concerns about the safety and welfare of an Adult at Risk. The Club provides support to all those employed by the organisation whether in a paid or voluntary capacity in respect of their mental health through a number of initiatives including access to mental health first aiders.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

Responding to disclosures, safeguarding incidents and concerns

It may be necessary for mental health first aiders to break confidentiality in certain circumstances for example:

- Where there is an immediate danger, when a person has clearly disclosed that they plan to take their life or has taken action which puts their life in danger
- The person is experiencing a crisis and emergency services, health professionals and/or mental health professional need to be contacted in order to access support
- The person is planning to take action which may put others at risk

If you have a concern for a colleague in respect of their mental health or whilst acting as a mental health first aider a disclosure occurs and you feel that the above conditions have been met then you should contact either Head of Safeguarding or any member of the safeguarding team.

What is a disclosure?

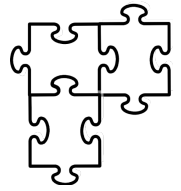
A disclosure is the process by which a person starts to share that they have been abused with others. This can happen in a variety of ways including:

- Directly:

Telling someone what has happened to them.

- Indirectly:

Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries or discussions about fears, concerns or relationships. We recognise that it takes extraordinary courage for someone to go through the journey of disclosing abuse and we will ensure that appropriate action is taken to support and protect them.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

Responding to a disclosure

Listen:

- Staff should give their full attention to the person disclosing and should keep their body language open and encouraging.
- Staff should respect pauses and not interrupt the person disclosing.
- Staff should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification, Staff should use the language of the person disclosing to show that it is their experience.

Reassure:

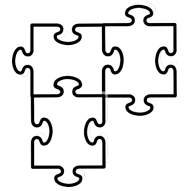
- Staff should provide reassurance that the person disclosing is being taken seriously and that they are not to blame.

Views and wishes:

- Staff should engage the person disclosing as far as possible about how best to respond to their safeguarding situation.
- Staff are expected to act in the best interests of the Adult at Risk. Seek advice from the EFL Safeguarding Team without delay if in any doubt about what action to take, including sharing information.

Safety:

- Staff should ensure that the immediate needs of the person disclosing are met and should prioritise their safety and protection above all else. This may involve contacting emergency services and/ or statutory agencies. The Head of safeguarding or any member of the safeguarding must be immediately notified of all such action. All such concerns must be recorded on the electronic single central record My Concern.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

Take action:

- Staff should explain to the person disclosing what action they will be taking and that they will support them through the process. There may be circumstances where it is not appropriate to explain the actions that will be taken, for example if doing so would place the person at greater risk of harm.
- Staff should refer details of the disclosure to the Club Safeguarding Team.
- Where it is suspected that a crime has been committed, the police should be contacted immediately, and physical, forensic and other evidence must be preserved.

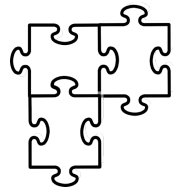
Record:

- Good record keeping is essential safeguarding practice. It is vital that Staff make a written record as soon as possible after the person has disclosed, their immediate needs have been met and the appropriate referrals have been made.
- Staff should contact the Club Safeguarding Team if in doubt about recording requirements.

Staff must never:

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

The flowchart in this document (Page 21) outlines the steps to be taken by Staff when dealing with a disclosure, safeguarding incident or allegation.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

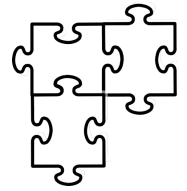
Recording information:

All incidents, allegations and disclosures must be recorded. A written record should include the following information:

- Provide a factual account of what you have observed or have been told.
- The date and time of what you have witnessed or been told.
- Details of those involved:
 - Person(s) whose safety and welfare there are concerns about.
 - Alleged perpetrator of abuse or person(s) whose behaviour or actions there are concerns about.
 - Witnesses and (iv) any third party who has raised concerns.
- Action taken and your rationale for taking these actions.
- Date and time of referring the information and to whom the information was referred.
- Your details as the referrer.

Staff are expected to:

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner.
- Record factual information rather than assumption of what you have witnessed or been told.
- Record actual words and language. Don't rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe any bruises, marks or injuries. If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.
- WBA record incidents and concerns on the single central record system My Concern. Staff must place an entry on My Concern within 24 hours of the incident. The Head of Safeguarding or any member of the safeguarding team should be informed of any serious concern immediately.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

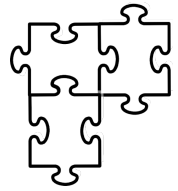
Preserving Evidence

In physical and sexual abuse cases, where an adult at risk wishes to show you an injury, only observe what he/she 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 weapons unless they are handed directly to you. If this happens, keep handling to a minimum.
- Place the items/weapons in a clean, dry place to hand to the police;
- Preserve anything that was used to comfort the abused adult at risk, for example, a blanket
- Secure the room. Do not allow anyone to enter unless strictly necessary to support you or the abused adult at risk and the alleged perpetrator, until the police arrive.

Before the police arrive:

- Ensure that no one has physical contact with both the abused adult at risk and the alleged perpetrator as cross contamination can destroy evidence;
- Encourage the victim not to shower;
- Encourage the victim not to change clothing;
- Even when the adult at risk says they do not want police involvement, preserve items anyway as the adult at risk may change his/her mind later or you may be legally obliged to inform the police;
- Encourage the adult at risk not to eat or drink if there is a possibility that evidence may be obtained from the mouth.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

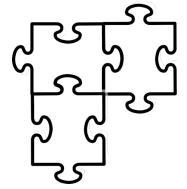
Methods of Preservation

- For most things use clean brown paper, if available, or a clean brown paper bag or a clean envelope. If you use an envelope, do not lick it to seal. Avoid using plastic bags as they can produce moisture.
- For liquids use clean glassware.
- Do not handle items unless necessary to move and make safe. If there are latex gloves available use them.

Confidentiality and Storing of Information

All disclosures, safeguarding incidents and allegations must be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. The storage of this information and relevant security measures will be outlined in the Data Protection and GDPR policy. GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purpose of keeping children, young people or adults at risk safe. More information and advice on information sharing for safeguarding practitioners can be found through government GDPR web page or on request from the Head of Safeguarding at safeguarding@wbafc.co.uk.

Those who need to know are those who have specific responsibilities to support and protect the Adult at Risk and others who may be at risk, for example, statutory agencies, the Club Safeguarding Team, and The FA.



Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

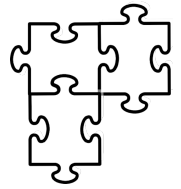
Non Recent Abuse

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years old or over, relating to an incident which took place when the alleged victim was under 18 years old. Allegations of child abuse are sometimes made by adults and children many years after the abuse has occurred. There are many reasons for an allegation not being made at the time, including fear of reprisals, the degree of control exercised by the abuser, and shame or fear that the allegation may not be believed. Reports of non-recent concerns or allegations of abuse may be complex, as the alleged victims may no longer be living in the same situation where the abuse occurred and/or the whereabouts of the alleged respondent may be unknown. However, such cases should be responded to in the same way as any other safeguarding concern or allegation. That is because:

- There is a likelihood that a person who abused a child/children in the past will have continued and may still be doing so;
- Criminal prosecutions can still take place, despite the fact that the allegations are non-recent in nature and may have taken place many years ago.

Communication and media protocols

All media enquiries and communication with Club, The Albion Foundation (TAF) and other stakeholders following a safeguarding incident or about our safeguarding provision generally must be approved by our Communication and Safeguarding Teams. Support for Staff Dealing with a disclosure or a safeguarding incident may have an impact on the wellbeing of those involved. It is important that anyone affected seeks help if they feel that they need support.



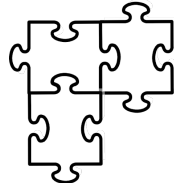
Safeguarding Procedures For Staff, Volunteers, Third Parties And Subcontractors Employed By The Club

Sharing Information

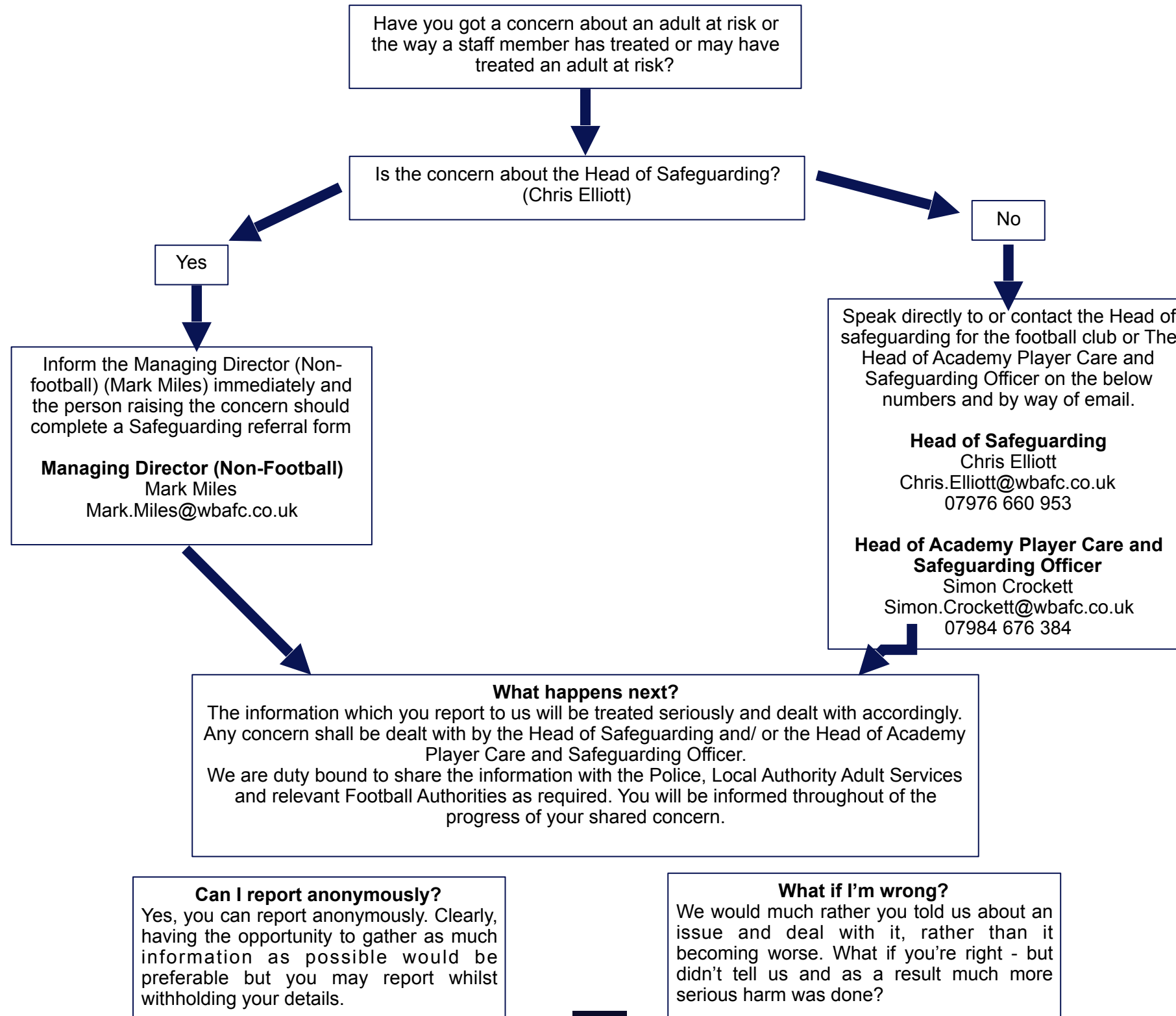
Adults may not give their consent to the sharing of safeguarding information for some reasons. For example, they may be unduly influenced, coerced, or intimidated by another person, they may be frightened of reprisals, they may fear losing control, they may not trust social services or other partners, or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support may help to change their view on whether it is best to share information.

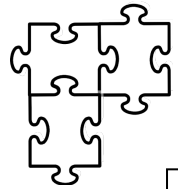
Safeguarding staff should consider the following when speaking with the adult:

- Explore the reasons for the adult's objections – what are they worried about?
- Explain the concern and why you think it is important to share the information
- Tell the adult with whom you may be sharing the information with and why
- Explain the benefits, to them or others, of sharing information – could they access better help and support?
- Discuss the consequences of not sharing the information – could someone come to harm?
- Reassure them that the information will not be shared with anyone who does not need to know
- Reassure them that they are not alone and that support is available to them.

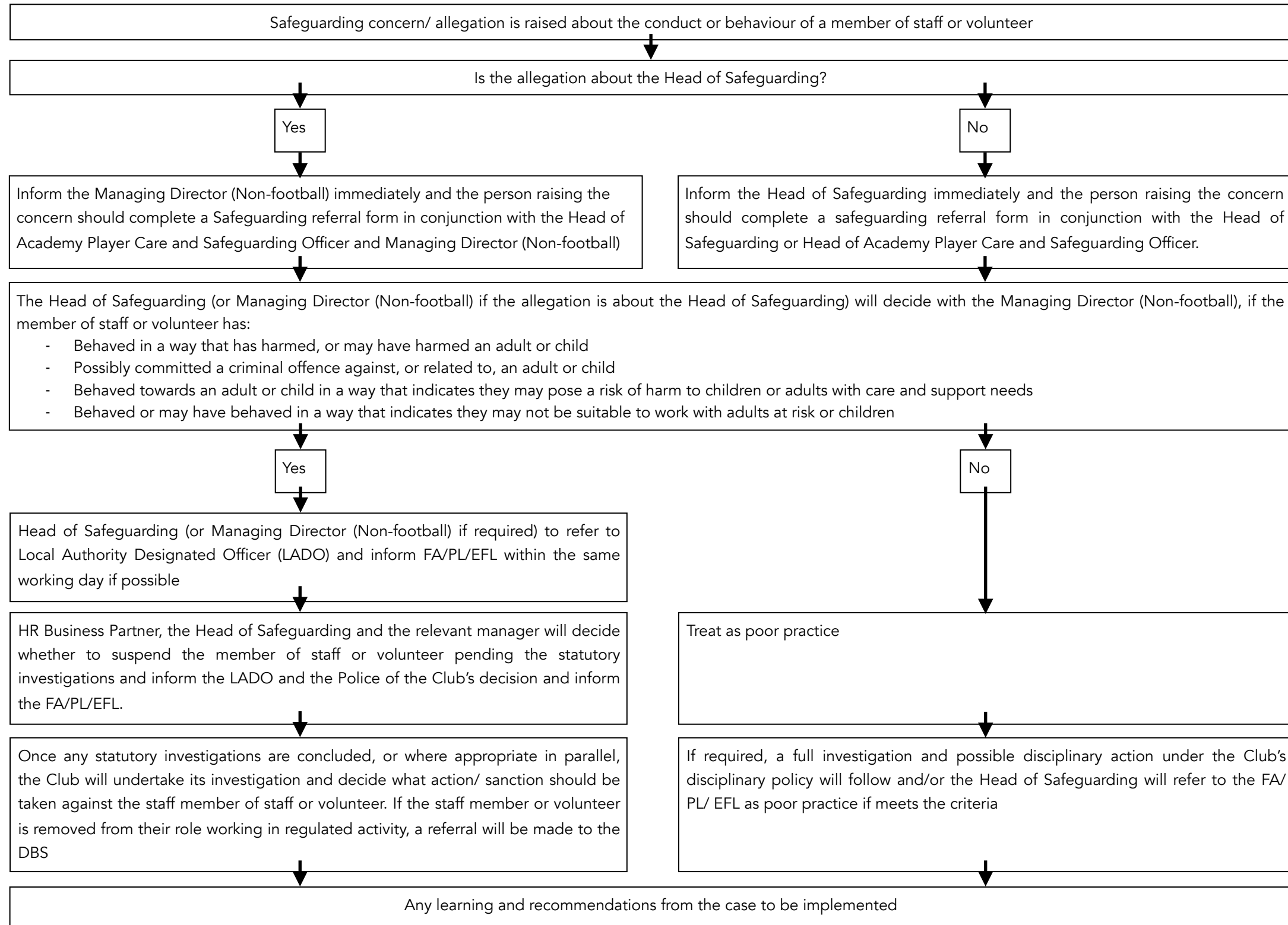


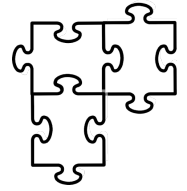
How To Report a Concern





Allegations Against Staff





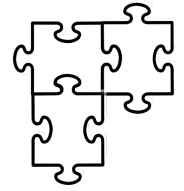
Key Contacts / Other Applicable Club Policies and Procedures

Key Contacts

- Chris Elliott Head of Safeguarding West Bromwich Albion Football Club FC – 07976660953
- Safeguarding@wbafc.co.uk
- Police - 101 or 999 in an emergency
- Samaritans 116 123
- Sandwell Adult Services Care Team
- Sandwell_enquiry@sandwell.gov.uk 0121 569 2266 day time
- Out of hours 0121 569 2355

Other Applicable Club Policies and Procedures

- Bullying and Harassment Policy
- Data Handling and Protection Policy
- Disciplinary Policy
- Equal Opportunities Policy
- Grievance Policy
- Health and Safety Policy
- Human Rights and Modern Slavery Policy
- Safeguarding Children and Young People Policy and Procedures
- Whistleblowing Policy



Key Government Initiatives and Legislation

Key Government Initiatives and Legislation

- Achieving Best Evidence 2002 Care Act 2020
- Equality Act 2010 Human Rights Act 1998
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- Protection of Freedoms Act 2012 Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018 (GDPR General Data Protection Regulations)
- Privacy Policy



WEST BROMWICH ALBION FOOTBALL CLUB

This document will be reviewed annually by the Senior Safeguarding Group