



**SOMERSET  
ACTIVITY AND SPORTS PARTNERSHIP  
(SASP)**

**POLICY FOR SAFEGUARDING  
ADULTS AT RISK**

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## ***Introduction***

SASP is a charitable trust which plays a leading role in co-ordinating and delivering sport and physical activity across the age ranges in Somerset. SASP is committed to providing safe, enjoyable physical activity and sporting opportunities for vulnerable adults.

The policies and procedures outlined in this document are designed to cover all aspects of SASP's work with vulnerable adults and relate to all staff and volunteers employed or deployed on a voluntary or paid basis for the programmes over which it has supervision and control.

SASP also has a strategic responsibility to ensure that partners with whom it works, have adequate safeguarding measures in place.

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## Somerset Specific Contacts

Organisation	Role	Contact
Somerset Activity and Sports Partnership	Safeguarding Officer	01823 653990
In an emergency dial 999		
Somerset Adult Social Services		0300 123 2224
National Governing Body (NGB) of Sport	Safeguarding Managers	Please use individual NGB website for contact details of safeguarding managers

## Other Useful Organisations

Action on Elder Abuse	A national organisation who aim to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.	0808 8088141 (UK helpline)
Ann Craft Trust	A national organisation working with staff in the statutory, independent and voluntary sectors in the interests of people with learning disabilities who may be at risk from abuse.	01159 515400
Carers Direct	Free, confidential information and advice to carers.	0808 802 0202 Lines are open 9am to 8pm Monday to Friday (except for Bank Holidays), 11am to 4pm at weekends. Calls are free from UK landlines and mobiles or you can request a free call back.
Respond	Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.	0808 8080700 (Helpline)

## **Definitions**

### **Adult at Risk**

Safeguarding duties apply to an adult (all people aged over 18) who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or is 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.

### **Safeguarding**

The process of protecting children and adults at risk from abuse or neglect, preventing impairment of their health and development and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables them to have optimum life chances.

### **Parent**

The term parent also refers to carers or guardians of adults at risk, or people with parental responsibilities for adults at risk.

### **Poor Practice**

Poor practice includes any behaviour that contravenes SASPs Code of Conduct.

### **Capacity**

While it is not for individuals to make a decision about whether an adult lacks capacity, it is important that you have an understanding of the notion of capacity when safeguarding adults at risk.

Capacity refers to an individual's ability to make a decision or take a particular action for themselves at a particular time, even if they are able to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear for a sports activity, or what a healthy sports diet would be, but they lack the capacity to make more complex decisions about financial matters.

## **1.0 OUR COMMITMENT**

We will endeavour to:

- Ensure that our staff and volunteers are carefully selected, trained and supervised.
- Ensure that clear procedures are in place and understood by all staff and volunteers for implementing this policy.
- Provide clear procedures for adults at risk to voice their concerns or lodge complaints about any issue.

### **1.1 Policy Aims**

This Adults at Risk Policy is mandatory for all staff working for the Partnership and is provided as part of an induction package to all those employed, whether paid or unpaid, who will have direct contact with vulnerable adults.

The aims are:

- To create a healthy and safe environment at all activities, sport programmes and sessions.
- To ensure adults at risk are listened to, and kept safe from harm.
- To support and encourage parents / carers to voice their opinions regarding the welfare of participants.
- To ensure staff and volunteers who administer sessions are well informed, supported and enabled to provide the best possible practice.

### **1.2 Objectives**

The objectives are:

- To raise the level of awareness of staff and volunteers about abuse and its various forms.
- To raise the level of awareness of staff and volunteers about what all adults at risk are entitled to be protected from.
- To ensure that all staff are able to recognise signs and symptoms which could signify abuse.
- To promote the general welfare, health and full development of all participants during all sessions.
- To develop effective procedures in recording and responding to accidents and complaints and to alleged or suspected incidents of abuse.

### **1.3 Communication**

- All staff working within the Partnership will receive, on appointment, training on the Partnership safeguarding policies (Children and Adults at Risk) as part of their induction.
- All staff already working for the Partnership will undergo awareness training a minimum of once per year.
- All participants will be made aware of who to contact if they have any concerns.

## **2.0 RECRUITMENT, EMPLOYMENT AND DEPLOYMENT OF STAFF AND VOLUNTEERS**

### **2.1 Recruitment and Selection of Staff / Volunteers**

All successful applicants for posts and all current casual staff in regulated activity (either paid or unpaid) involving direct contact with adults at risk will be subject to a DBS check to ensure that there is no cause for concern. If anything is flagged during a DBS check SASP will follow employment law. Please see Appendix C for the DBS eligibility flowchart.

### **2.2 Induction and Training**

Relevant training on the policy and procedures will follow up the recruitment and selection process for relevant staff.

- All staff and volunteers on appointment will, as part of their induction, receive access to a copy of the Employee Handbook plus training on the Partnership safeguarding policies and be required to sign a Code of Conduct to confirm they abide by it.
- All staff will be expected to undertake regular training / updates on safeguarding awareness.
- Staff will be made aware that abuse of adults at risk can and does occur and that colleagues, who are members of staff or volunteers, could perpetrate it.
- It is made clear that most abusers are not the monsters most people picture them to be, but ordinary men and women and can be extremely clever, manipulative and powerful.
- All staff will be made aware that adults at risk can find it very difficult to talk about abuse. They need to be listened to, taken seriously, and have their concerns acted upon.
- Staff are made aware of what they need to do in response to concerns.

## **3.0 PROMOTING GOOD PRACTICE**

### **3.1 Duty of Care**

Duty of care means that organisations need to take such measures as are reasonable in the circumstances to ensure that individuals will be safe to participate in an activity to which they are invited to or which is permitted. Where there is a formal relationship, for example between a club and a club member, or a coach and an athlete, there is a duty of care.

This duty occurs in two ways:

A **Legal** Duty of Care

A **Moral** Duty of Care

The Legal Duty of Care has a strict definition. The most obvious example of this is in Health and Safety procedures where clear guidance is provided about what reasonable steps should be taken to minimise the hazards related to activities, substances or situations. In many sports activities, given the health and safety considerations, it is recognised that a

sports organisation or individual (e.g. coach) owes a duty of care to its members. However, it is also understood and recognised that accidents can and do happen, and that it is not possible to predict every eventuality. Liability for the legal duty of care would only arise when an incident occurs and it can be demonstrated that the risk was foreseeable but no action had been taken to remedy it.

The Moral Duty of Care is more correctly a responsibility for safety and welfare. Members of staff have a responsibility for those adults at risk, and other staff, who are under their control. To determine if a breach of the duty of care has occurred, the ordinary civil law of negligence would be applied. The question is whether the accused in acting, or omitting to act, has failed to reach the standard of a reasonable person.

In specialist sports activities the qualified instructor has a duty of care for all those taking part irrespective of their age or position. The individual administering the activity, whatever their status, should be appropriately trained and authorised. Within sports organisations the duty of care would start by ensuring the activity is authorised by the sport and the relevant instructors are qualified for the task but then would go on to ensure that it is managed in a safe manner throughout.

### **3.2 Code of Conduct**

All staff and volunteers working for the Partnership must sign and abide by the Staff Code of Conduct (Appendix A).

The Code of Conduct is partly a values statement but also a useful framework and tool to reduce situations where abuse may occur. The following is a broad overview of the care which should be taken when working within a sports/leisure context.

You should:

- Treat all children and young people and adults with respect.
- Provide an example for good conduct you wish others to follow.
- Ensure that whenever possible there is more than one adult present during activities with adults at risk, or at least that you are within sight or hearing of others.
- Respect the right to personal privacy and encourage participants to feel comfortable and caring enough to point out attitudes or behaviours they do not like.
- Remember that someone else might misinterpret your actions, no matter how well intentioned.
- Be aware that physical contact may be misinterpreted.
- Recognise that special caution is required when you are discussing sensitive issues with adults at risk.
- Operate within Somerset Activity & Sports Partnership principles, guidance and procedures.
- Challenge unacceptable behaviour and report all allegations / suspicions of abuse.
- The member of staff must always place the well-being and safety of the participant above the development of performance.
- Staff should build relationships which are balanced and based on mutual trust.



You should not:

- Have inappropriate physical or verbal contact.
- Allow yourself to be drawn into inappropriate attention-seeking behaviour or make suggestive or derogatory remarks or gestures in front of children, young people or adults.
- Jump to conclusions about others without checking facts.
- Either exaggerate or trivialise abuse issues.
- Show favouritism to any individual.
- Rely on your good name or that of SASP to protect you.
- Believe 'it could never happen to me'.
- Take a chance when common sense, policy or practice suggests another more prudent approach.
- You should give guidance and support to inexperienced helpers.

### **3.3 Physical Contact**

There are a number of principles that should be followed when the activity involves physical contact. Physical contact during sport should always be intended to meet the participants' needs, NOT the adult's. The adult should only use physical contact if their aim is to:

- To treat an injury.
- To prevent an injury or accident from occurring.
- To meet the requirements of the sport or develop sports skills or techniques but in strict accordance with guidelines recommended by the relevant National Governing Body.

The adult should always seek to explain the nature and reason for the physical contact. Unless the situation is an emergency, the adult should ask for permission.

Participants should be encouraged to voice concerns they have if any physical contact makes them feel uncomfortable or threatened. Contact should not involve touching genital areas, buttocks, breasts or any other part of the body that might cause distress or embarrassment. Physical contact should always take place in an open or public environment and not take place in secret or out of sight of others.

Physical punishment

Any form of physical punishment is unlawful, as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that those in positions of authority understand this both to protect their own position and the overall reputation of the organisation in which they are involved.

### **3.4 Supervision of Adults at Risk**

Making arrangements for the proper supervision of adults at risk is one of the most effective ways to minimise opportunities for participants to suffer harm of any kind whilst in your care.

- Organisers should provide clear guidance for parents, staff and participants.

- Leaders in charge must be satisfied that those workers and adults who accompany group parties are fully competent to do so.
- Any activity using potentially dangerous equipment should have been risk assessed and be subject to constant adult supervision.
- Dangerous behaviour should not be allowed.

### **3.5 Code of Conduct for Adults at Risk**

A Code of Conduct will be available for adults at risk to sign for all activities where relevant. Within one-off activities, a Codes of Conduct will be available in poster form at the venue where appropriate. Please see Appendix B.

### **3.6 Staffing/Supervision Ratios**

Organiser guidelines should be available for every activity.

### **3.7 Working with Disabled Participants**

Staff working with disabled adults will have updates on safe / best practice through the Inclusive Projects Manager. Support with risk assessments will be available where appropriate.

### **3.8 Guidelines for Photography**

SASP is keen to promote positive images of adults at risk participating in sport and is not banning the use of photographic or video recording equipment. However, there is evidence that some people have used sporting events as an opportunity to take inappropriate photographs and / or film footage.

It is not the intention of SASP to prohibit those with a genuine interest in filming or photographing adults at risk participating in sport but appropriate written consent is required to be gained before images are taken and used. Please see Appendix D for further guidance and consent proforma.

### **3.9. Guidelines for Transporting Adults at Risk**

Car Journeys

The key points are:

- When parents / supporters / carers make the travel arrangements to and from an activity without the knowledge of the organising body it is the responsibility of them to ensure the arrangements are both safe and appropriate.
- When an organisation makes the arrangements for travel there must be a risk assessment undertaken by members of staff and volunteers. The risk assessment will need to cover the following areas:
  - Ensuring all vehicles are correctly insured.
  - Ensuring all drivers have a valid and appropriate license and valid DBS.
  - Ensuring all safety measures are available i.e. seatbelts.

- Ensuring all drivers have adequate breaks.
- Where a journey is planned, written parental / carer consent is necessary if a volunteer or member of staff is to be transporting an adult at risk.

Along with safeguarding the adult at risk it is also important that any members of staff or volunteers are aware of the good-practice that is required to protect them:

- A collection policy needs to be agreed with parents / carers which will ensure a clear understanding of collection arrangements between all involved.
  - Always tell another member of staff that you are transporting an adult at risk, giving details of routes, length of journey and arrival times. Where this is an unplanned emergency inform the SASP safeguarding officer immediately.
  - Take all reasonable safety measures (seat belts).
  - Take another member of staff with you where possible.

### **3.10 Sharing of Information**

If someone does not want you to share information or you do not have consent to share the information, please ask yourself the following questions:

1. Is the adult placing themselves at further risk of harm?
2. Is someone else likely to get hurt?
3. Has a criminal offence occurred? This includes: theft or burglary of items, physical abuse, sexual abuse, forced to give extra money for lessons (financial abuse) or harassment.
4. Is there suspicion that a crime has occurred?

If the answer to any of the above questions is YES – then you must share this information with or without consent with the SASP Safeguarding Manager, NGB Safeguarding Manager (if relevant) and adult social care. Please see useful contact numbers at front of policy.

When sharing information there are 7 golden rules that should always be followed:

1. Seek advice if in any doubt. Without disclosing the identity of the person where possible, consult with your Safeguarding manager, NGB Safeguarding Manager or Somerset County Council social services.
2. Be transparent. The Data Protection Act is not a barrier to sharing information but to ensure that personal information is shared appropriately, except in circumstances where by doing so places the person at significant risk of harm.
3. Consider the public interest. Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
4. Share with consent where appropriate. Where possible, respond to the wishes of those who do not consent to share confidential information. You may still share information without consent, if this is in the public interest.
5. Keep a record. Record your decision and reasons to share or not to share information.
6. Accurate, necessary, proportionate, relevant and secure. Ensure all information shared is accurate, up to date and necessary and share only with those who need to have it.

7. Remember the purpose of the Data Protection Act is to ensure personal information is shared appropriately, except in circumstances where by doing so may place the person or others at significant harm.

### Assessing Capacity

A person's capacity must be assessed at the point at which the decision is needed, taking into account relevant and immediate circumstances as well as possible long term issues. Adults are assumed to be competent to give consent in making decisions, unless otherwise demonstrated by their capacity being affected by such things as: medication, substances and some untreated mental health issues. For adults, this means that they have the capacity to choose how they live and make decisions about their safety, even if we do not agree with certain decisions. If you are unsure or concerned that the person may not have the mental capacity to make an informed choice about their safety or evaluate the risk of abuse with their situation, you can report this to the SASP Safeguarding Manager, relevant NGB Safeguarding team or Somerset County Council. Please see Appendix F for the Information Sharing Flowchart

### **3.11 Use of Electronic Communication and Interactive social media technology Guidelines**

- This area of safeguarding is in a constant state of change and hence details of guidance is given in Appendix G which will be updated as new guidance is provided.

## **4.0 RESPONDING TO DISCLOSURES, SUSPICIONS OR ALLEGATIONS OF ABUSE**

The Main forms of Abuse and the ways in which they may present or manifest themselves can be found in Appendix H.

### **4.1 Responding to a Concern**

It is not your role to take individual responsibility for deciding whether or not abuse is or has actually taken place. However, there is a responsibility to protect adults at risk by referring to your manager. Managers will report all incidents to the SASP Safeguarding Lead.

The SASP Safeguarding Lead will take the appropriate action, informing Social Services who will take responsibility for informing the police. Where there is an immediate need to protect the adult at risk from danger the police must be advised.

There should always be a commitment to work in partnership with parents or carers where there are concerns about adults in their care. Therefore, in most situations it would be important to talk to parents or carers to help clarify any initial concerns. However, there are circumstances in which an adult at risk may be placed at greater risk if such concerns were shared (e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately). In such situations, or where concerns still exist, any suspicion, allegations or incident of abuse must be reported to your manager / person in charge as soon as possible.

Once the incident / allegation has been reported it is the responsibility of the SASP Safeguarding Lead to inform social services (see useful contacts) without delay. If the person in charge / or SASP Safeguarding Lead Officer is not available, the person discovering or being informed of the abuse should immediately contact social services, if appropriate, who will decide how and when parents / carers will be informed and ultimately become responsible for what steps to take next. Please see appendices I and J.

IT IS YOUR ROLE TO REPORT NOT TO JUDGE.

## **4.2 Dealing with Allegations against Staff/Volunteers**

Should a member of staff or volunteer become aware of an allegation (against a colleague) of an incident of abuse taking; or have taken place, it is vital that the procedures already detailed must be adhered to and the following actions are covered

- Take the allegation seriously. It is your duty to consider any allegation to be potentially dangerous to children or vulnerable adults and therefore report it.
- Complete the incident report form (Appendix K) with as many details of which you are aware.
- Report the allegations and pass the form to your Manager / Person in Charge or the SASP Safeguarding Officer within 24 hours.
- In a case where a senior member of staff may be involved, report directly to the SASP Safeguarding Officer / SASP CEO.
- Do not judge or investigate. As an employee or volunteer it is important not to lose focus of your role. By reporting an allegation quickly, any necessary investigations and / or judgement can then be made by trained professionals.
- Maintain confidentiality. It is extremely important that any allegations are not discussed (unless absolutely necessary) as any breaches could be damaging to the adult at risk and to any investigation that may follow.
- Any requests for information from members of the public (including parents) or the media should be directed to the SASP Safeguarding Officer and should be given the 'no comment' response.

## **4.3 Confidentiality**

Protection of adults at risk raises issues of confidentiality which must be clearly understood by all. The following guidelines should be adopted when concerns around adult protection arises to ensure that the referral procedure complies with the Data Protection Act (1998) and the Freedoms of Information Act (2004).

- Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of adults at risk with other professionals, particularly investigatory agencies and adult social services.
- Clear boundaries of confidentiality will be communicated to all.
- All personal information regarding an adult at risk will be kept confidential. All written records will be kept in a secure area for a specific time as identified in the data protection guidelines. Records will only record details required in the initial contact form.

- If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.
- Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the adult at risk is the priority.
- Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.
- Staff must assure the adult that they will keep them informed of any action to be taken and why. The adult's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

#### **4.4 Timescales**

- The incident must be completed and passed to the Manager / SASP Safeguarding Officer within 24 hours.
- Concerns involving the immediate safety of an adult at risk must be referred immediately and passed to the SASP Safeguarding Officer (by telephone call) and followed up within 24 hours by a completed incident form.
- The SASP Safeguarding Officer will report the incident to the relevant agency and report outcomes to the Partnership CEO, within 7 days.
- The SASP Safeguarding Officer will retain a copy of all completed incident forms.

## **CODE OF CONDUCT FOR STAFF, COACHES, OFFICIALS, TEAM MANAGERS AND SPECTATORS**

All coaches, officials, team managers and others involved in SASP activities, (professionals and volunteers) will:

<b>Rights and Relationships</b>
Treat all participants with respect and dignity. Build balanced relationships based on mutual trust which empowers participants to share in the decision making process. Do not discriminate on the grounds of gender, gender reassignment, race, colour, disability, sexual orientation, sexuality, age, religion or beliefs. Please see the SASP Equal Opportunities and Diversity Policy for more information.
Put the welfare of each participant first and give every child the opportunity to achieve. The member of staff must always place the well-being and safety of the performer above the development of performance.
Be realistic, open and honest with participants about winning and the achievement of personal goals. Encourage and guide performers to accept responsibility for their behaviour and performance. Challenge and oppose unacceptable or discriminatory behaviour, and deal with any incidence of discriminatory behaviour.
Give aspirational, fair, open and constructive feedback.
Encourage participants to ask questions, speak openly and appropriately to age, setting and context.
Always respect the 'space' of children and adults at risk and maintain an open, safe and appropriate distance with performers. (If any form of manual / physical support is required, it should be provided openly and according to guidelines provided by the NGB. Participants should always be consulted and their agreement gained. Parents/carers are becoming increasingly sensitive about manual support and their views should always be carefully considered).
Respect a young person's right to personal privacy and encourage young people to feel comfortable and caring enough to point out attitudes or behaviours they do not like.
Recognise and strive to meet the development needs, ability and capacity of performers to succeed and be challenged, especially in performance environments.
Respond to any concerns about a child's or adult at risk's welfare by following procedures in the Safeguarding and Protecting Young People and Adults at Risk Policies, and work in partnership with other organisations in the individual's best interests. Policies available on the SASP website.
Involve parents / carers wherever possible. If groups have to be supervised in the changing rooms, know that as good practice, parents/teachers/coaches etc. should work in pairs.
Coaches are in a position of power and trust in relation to participants. By entering into an intimate /sexual relationship with a participant for whom you have responsibility, a coach may be deemed guilty of abusing this position and, in relation to children and young people, this may also be unlawful. This also applies to sexual innuendo, flirting or inappropriate gestures and terms. Therefore coaches must avoid sexual intimacy with performers either while coaching them or in the period of time immediately following the end of the coaching relationship. In addition, all coaches are aware that 'discriminatory, offensive and violent behaviour are unacceptable and complaints will be acted upon'.

<b>Personal and Professional Standards</b>
Be an excellent role model displaying high standards of personal and professional behaviour and appearance and work in an open environment, being visible and identifiable as the person in charge.
Make sport fun, purposeful and enjoyable - addressing individual as well as group needs, goals and potential. Promote fair play.
Keep up to date with the technical skills, qualifications and insurance.
Ensure equipment and facilities are safe and appropriate to the age and ability of the participant.
Ensure that as part of best practice at tournaments or residential, adults will never invite players/athlete into their rooms. Also ensure that staff do not enter participants rooms, except in an emergency in which case there will be clear, open and announced protocols agreed beforehand for such circumstances.
<b>Medical and Accident</b>
Secure parental / carer consent in writing to act <i>in loco parentis</i> , if the need arises, to give permission for the administration of emergency first aid and / or other medical treatment.
Ensure that you know of any medicines being taken by participants, or existing injuries.
Ensure that there is a written record of any injury that occurs, along with details of any treatment given and that parents are informed. A record of this is to be passed to the Office Manager.
<b>Photographic</b>
Ensure that use of photographic and filming equipment along with mobile phones and the use of social media is appropriate, covered by guidelines which apply and that relevant permission of parents/carers has been sought for their use.
<b>Data Protection</b>
Any individual's Personal Information obtained, stored or used must comply with current General Data Protection Regulations (GDPR). Ensure that you are familiar with SASP's Privacy & Data Protection Policies.

**Print Name:**

**Signed:**

**Date:**

**Activity (e.g. swimming, health walks):**

***All breaches of the Code will be dealt with in accordance with the range of disciplinary procedures - including appeals - as outlined in our Policy.***



### Code of Conduct for Participants

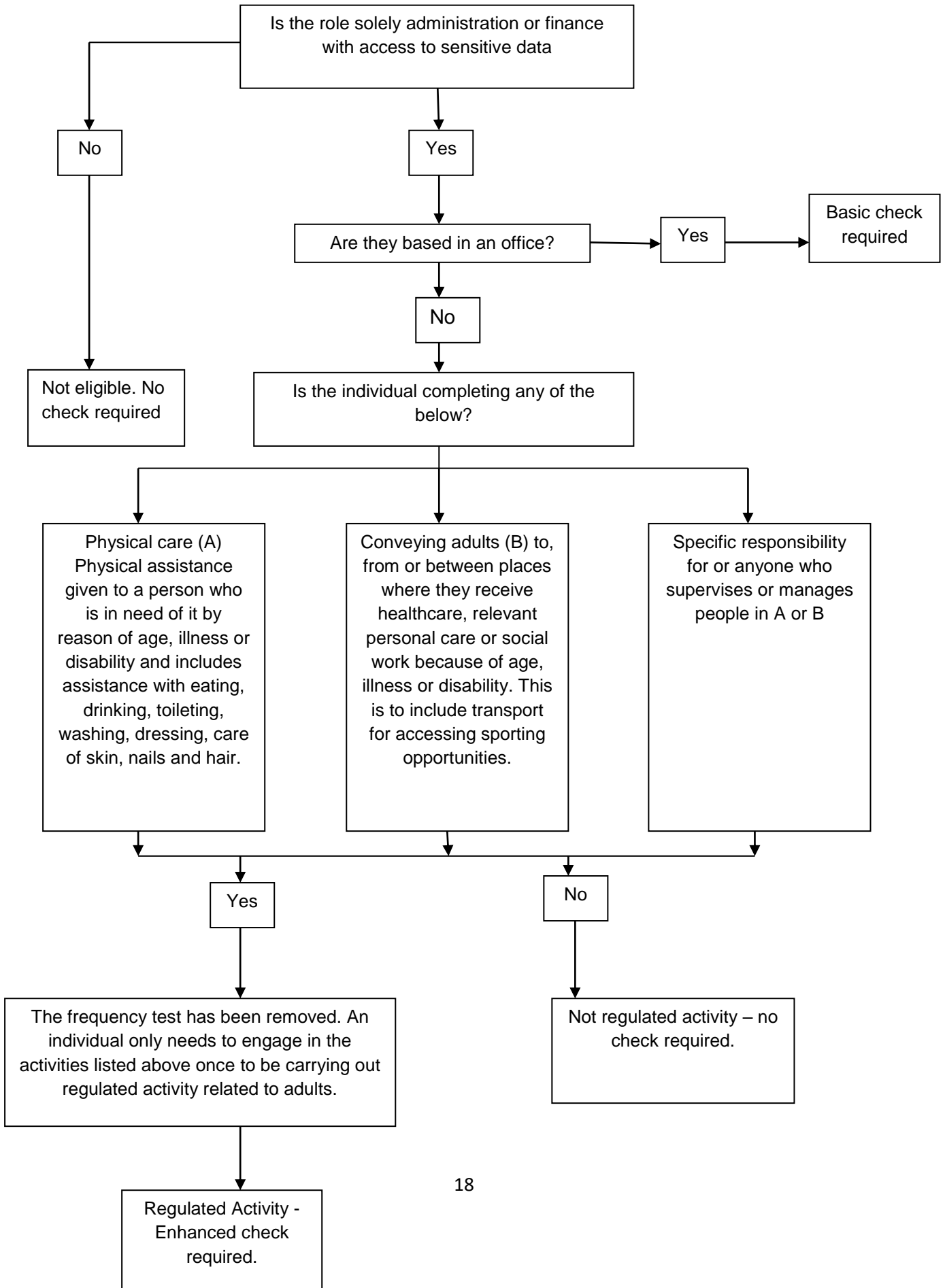
- I will treat others with the same respect and fairness that I would like them to show to me.
- I will play within the rules, and respect officials and their decisions.
- I will demonstrate fair play on and off the field.
- I will respect others regardless of gender, disability, age, race, ethnicity, sexual orientation and religious belief.
- I will challenge any behaviour that discriminates against others.
- I will not engage in any irresponsible or illegal behaviour
- I will inform my team manager if I need to leave my team / accommodation at any time
- I will speak out if I am concerned, or if I feel uncomfortable
- I will be organised and on time

**Signed** .....

**Date** .....

APPENDIX C

**Eligibility Flow Chart for DBS Checking for working with Adults at Risk**



## APPENDIX D

### **Photography and Filming Children and Adults at Risk in Sport Guidelines**

Somerset Activity & Sports Partnership is committed to providing a safe environment for young people and adults at risk. Part of this commitment is to ensure that all necessary steps are taken to protect them from the inappropriate use of their images in resource and media publications, on the internet and elsewhere. Parents/carers and organisations often want to be able to celebrate the achievements of their participants when taking part in sporting activities through taking photographs or films. Sports organisations may also want to promote their activities to encourage increased participation. The guidance applies whether images are taken using cameras, mobile phones or any other equipment.

#### **What are the potential concerns?**

There have been concerns about the risks posed directly and indirectly to young people and adults at risk through the use of images (photographs and videos) on sports websites, social networks and other publications. Images can be used as a means of identifying individuals when associated with personal information e.g. x is a member of the z sports club; y has taken part in the z organised by x assisted living centre. This information can make an individual vulnerable to people who may wish to contact and start to “groom” that child for abuse – online (e.g. through websites or social networking) or through direct contact. Information placed on the internet has also been used by estranged parents (e.g. in adoption or domestic violence circumstances) to identify, trace and cause significant difficulties for children. Secondly the content of photographs can itself be inappropriate, or be used or adapted for inappropriate use. There is evidence of inappropriate or adapted material finding its way onto sites showing child abuse images, and of inappropriate images being shared between groups of offenders.

#### **SASP Guidelines**

- Where possible do not include the name of a child whose image is being used.
- If naming a child or adult at risk, only use their first names, as this will reduce the risk of inappropriate, unsolicited attention from people within and outside the sport.
- Avoid the inclusion of other detailed information about individuals.
- Ask the parent / carer / school permission to use the participant image. This ensures that they are aware of the way the image is to be used to represent the sport.
- Be clear about how and for how long images will be securely stored (including how access to the images, associated consents and other information will be controlled).
- Only use images of participants in suitable dress/kit (including required or recommended safety wear such as shin pads, gum shields etc.) to reduce the risk of inappropriate use.
- Images should positively reflect participants' involvement in the activity and promote the best aspects of the sport.
- With regard to the actual content it is difficult to specify exactly what is appropriate given the wide diversity of sports. However there may be some sports activities (e.g.

gymnastics or swimming) where the risk of potential misuse is much greater than for other sports. With these sports the content of the photograph should focus on the activity rather than on a particular child and should avoid full face and body shots. So for example shots of children in a pool would be appropriate or, if poolside, waist or shoulder up.

### **Guidelines for Use of Photographic Filming Equipment for Official Use at Sporting Events**

- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Issue the photographer/s with identification which must be worn at all times.
- Inform children and parents that a photographer will be in attendance at an event and ensure they consent to both the taking and publication of films or photographs which feature and clearly identify their child (e.g. close ups, small group and team photos).
- At many events, organisers and others will reasonably wish to take wide angle, more general photos of the event sites, opening and closing ceremonies, and so on. Separate to the issue of consent for 'identifying' photographs/footage of individual participants (as above) parents and children should at least understand that these types of images will be taken during, or at specific points in the event e.g. information could be included on the parental consent form. It is not reasonable, practical or proportionate to require parental consents for taking these general types of images, or to preclude it on the basis of the concerns of a small number of parents.
- Do not allow unsupervised access to children or one to one photo sessions at events.
- Do not approve/allow photo sessions outside the event or at a child's home.
- Children, parents and others should be informed that if they have concerns they can report these to the organiser.
- Concerns regarding inappropriate or intrusive photography should be reported to the event organiser or official and recorded according to the SASP policy guidelines for safeguarding and protecting children and adults at risk.
- Other professional photographers/filming/video operators wishing to record the event should seek accreditation with the event organiser by producing their professional identification for the details to be recorded.
- Students or amateur photographers/film/video operators wishing to record the event should seek accreditation with the event organiser outlining their motive for attending the event and planned use of the material.
- SASP will provide a signed photographic consent procedure at each event to include the photographers
  - name and address of the person using the camera
  - the reason or use the images are being or intended to be put to
  - signed declaration that the information provided is valid and that the images will only be used for the reasons given

## **Guidelines for Use of Photographic Filming Equipment by Parents / Guardians / Spectators at Sporting Events**

If parents/guardians or other spectators are intending to photograph or video at an event they should also be made aware of SASPs expectations.

- Spectators should be asked to register at an event if they wish to use photographic equipment.
- It is helpful for the event organisers to provide some indication e.g. a sticker for each registered camera, or badge to be displayed by the spectator to help others recognise those who have registered, and respond to those who do not appear to have registered.
- The specific details concerning photographic/video and filming equipment registration should, wherever possible, be published prominently in event programmes, on signage around the site and announced over the public address system, prior to the start of the event.

### **At club sessions**

There is no intention to prevent club coaches and teachers using videoing as a legitimate coaching aid. However, children/young people/adults at risk and their parents/carers should be aware that this is part of the coaching programme and consent to it. Care should be taken in the secure storage of such materials and films.

### **Images of elite young athletes**

As young athletes progress higher up the competitive ladder within their sport, elite level events are increasingly likely to take place in a public arena. Event organisers and sports governing bodies will quite reasonably seek publicity to positively promote their sport, and elite young athletes receiving endorsements or sponsorship may well welcome positive media coverage on a local, regional or national level. Organisers retain their duty of care to these athletes and a responsibility to safeguard them. In respect of some elite young athletes aspects of the more general guidance around the use of images detailed above (for example avoiding the inclusion of names and some other personal details alongside photographs) are neither practical nor desirable.

It is important that other aspects of this guidance (for example about the nature, content and use of images; and about ensuring that photography sessions are supervised) are considered and applied. It is important for the athletes; their parents and media representatives to be clear about appropriate arrangements and ground rules for interviews, filming and photo sessions. Young elite athletes and their parents should be supported by the sports organisation and prepared to manage these and a range of other issues (including safeguarding concerns) that may arise as a result of their sporting success and increased public profile.

## APPENDIX E

### Photography and Filming Consent Form

In accordance with our Safeguarding and Protecting Young People and Adults at Risk Policies, SASP will not permit photographs or the recording of participants to be taken without the consent of the parents/carers and the participant. If you become aware that images or recordings are being used inappropriately you should inform the SASP Safeguarding Officer on 01823 653990 immediately. For more information please see the SASP Photography and Filming Policy on the SASP website.

#### By signing this consent form you:

- Consent to SASP taking and using images and recordings, including images of you/your child for publicity reasons. These images may appear on websites, social media, posters and leaflets or in the press to positively promote sport and physical activity. SASP will take all steps to ensure that these images are used solely for the purposes they are intended.
- I understand that images on websites and social media sites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of the individual as EU/UK legislation provides.
- I understand that images and recording will be kept as long as necessary and that some images and recordings may be kept permanently as an archive of SASP activity.

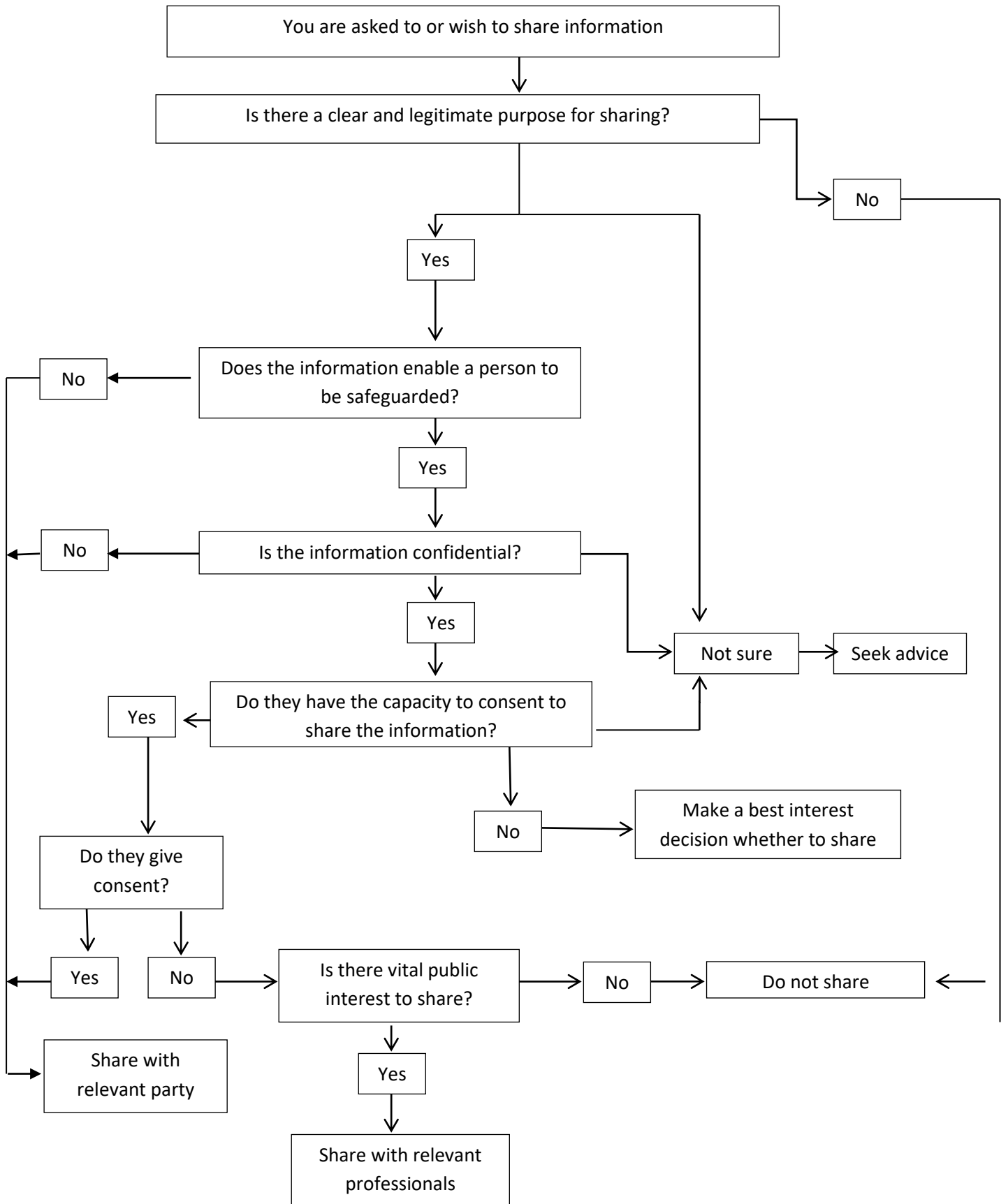
<b>Consent Information</b>	
To be completed by participant (please tick):	
<input type="checkbox"/> I consent to SASP photographing or filming my involvement in sporting activities	
<input type="checkbox"/> I confirm that I have been made aware of SASPs photography and filming policy	
To be completed by parent/carer, for those under 18 (please tick):	
<input type="checkbox"/> I consent to SASP photographing or filming my child	
<input type="checkbox"/> I can confirm that I have been made aware of SASPs photography and filming policy	
<input type="checkbox"/> I can confirm that I have been made aware of how SASP will use these images or recordings	
Signature of participant	
Print name of participant	
Date	

Signature parent / carer	
Print name of parent / carer	
Date	

<b>Group Consent for Photography</b>	
To be completed by Group:	
<input type="checkbox"/> I consent to SASP photographing or filming my group <input type="checkbox"/> I can confirm that I have been made aware of SASPs photography and filming policy <input type="checkbox"/> I can confirm that I have been made aware of how SASP will use these images or recordings	
Group name	
Signature of group contact	
Print name of group contact	
Date	

SASP is committed to processing information in accordance with the General Data Protection Regulation (GDPR). The personal data collected on this form will be held securely and will only be used for administrative purposes. For more information please see the SASP Privacy Policy on our website.

### Information Sharing Flowchart





## APPENDIX G

### **E Safety Policy (including social media)**

It is important that all staff, volunteers, coaches, officials/referees, board/trustee members, or anyone working on behalf of SASP are aware of this policy and agree to the following terms. This policy provides guidance on how SASP uses the internet and social media, and the procedures for doing so. It also outlines how we expect the staff and volunteers who work for us, and the children or young people who are members of our organisation, to behave online.

#### **Aims:**

The aims of our online safety policy are:

- To protect all children and young people involved with SASP and who make use of technology (such as mobile phones and the internet) while in our care
- To provide staff and volunteers with policy and procedure information regarding online safety and inform them how to respond to incidents
- To ensure SASP is operating in line with our values and within the law regarding how we behave online

#### **Understanding the online world**

As part of using the internet and social media, SASP will:

- Understand the safety aspects – including what is acceptable and unacceptable behaviour for staff and children – when using websites, social media, apps and other forms of digital communication
- Be aware that it doesn't matter what device is being used for digital interaction, but that the same safety aspects apply whether it is a computer, mobile phone or games console
- When using social media platforms, ensure that we adhere to relevant legislation and good practice guidelines
- Regularly review existing safeguarding policies and procedures to ensure that online safeguarding issues are fully integrated
- Provide appropriate training for staff involved with SASP's online presence

#### **Managing our online presence**

Our online presence through our website or social media platforms will adhere to the following guidelines:

- All social media accounts will be password-protected, and at least 3 members of staff will have access to each account and password
- Adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers
- The accounts will be monitored by a designated person (Communications Lead), who will seek advice from the Safeguarding Lead to advise on safeguarding requirements.

- Identifying details such as a child's home address, school name or telephone number shouldn't be posted on social media platforms
- Any posts or correspondence will be consistent with our aims
- Parents will be asked to give their approval for SASP to communicate with their children through social media, or by any other means of communication
- Parents will be asked to give their permission for photographs or videos of their child to be posted on social media
- All of our accounts and email addresses will be appropriate and fit for purpose

### **What we expect of staff and volunteers**

- Staff should be made aware of this policy and behave in accordance to it
- Staff should seek the advice of the designated safeguarding lead if they have any concerns about the use of the internet or social media
- Staff should not 'friend' or 'follow' children or young people from personal accounts on social media
- Staff should make sure any content posted is accurate and appropriate, as young people may 'follow' them on social media
- Staff should not communicate with young people via personal accounts or private messages
- Rather than communicating with parents through personal social media accounts, staff should choose a more formal means of communication, such as face-to-face, in an email or in writing, or use an organisational account, profile or website
- At least one other member of staff should be copied in to any emails sent to children or young people
- Emails should be signed off in a professional manner, avoiding the use of emoji's or symbols such as 'kisses' ('X's)
- Any disclosures of abuse reported through social media should be dealt with in the same way as a face-to-face disclosure, according to our reporting procedures
- Smartphone users should respect the private lives of others and not take or distribute pictures of other people if it could invade their privacy
- Staff and young people must not engage in 'sexting' or send pictures to anyone that are obscene, indecent or menacing

### **What we expect of children and young people**

- Children should be aware of this online safety policy and agree to its terms
- To be aware that using mobile phones during activities has an impact on their safe environment, and their level of participation and achievement

### **Using mobile phones or other digital technology to communicate**

When using mobile phones (or other devices) to communicate by voice, video or text (including texting, email and instant messaging), we'll take the following precautions to ensure young people's safety:

- Staff will avoid having children's or young people's personal mobile numbers and will instead seek contact through a parent or guardian
- We'll seek parental permission on each occasion that we need to contact children or young people directly; the purpose for each contact will be clearly identified and agreed upon
- Texts will be used for communicating information – such as reminding children or young people about upcoming events, which kit to bring or practice timings – and not to engage in conversation
- If a young person misinterprets such communication and tries to engage a staff member in conversation, the member of staff will take the following steps:
  - End the conversation or stop replying
  - Suggest discussing the subject further at the next practice or event
  - If concerned about the child or young person, provide contact details for the Safeguarding Lead or appropriate agencies

***As an organisation, SASP commits to implementing this policy and addressing any concerns quickly and within these guidelines.***

## Appendix H

### **Main forms of abuse for adults at risk**

Abuse is defined as actions or a failure to act which causes harm to a vulnerable person or puts them at risk

The main forms of abuse for adults are:

#### ***Physical***

Physical abuse is the non-accidental infliction of physical force that results (or could result in) bodily injury, pain or impairment.

#### ***Emotional***

Emotional abuse describes acts or behaviour which impinges on the emotional health of, or which causes distress or anguish to, individuals. This may also be present in other forms of abuse.

#### ***Financial***

Financial abuse describes the unauthorized, fraudulent obtaining and improper use of funds, property or any resources of a vulnerable person.

#### ***Sexual***

Sexual abuse describes direct or indirect involvement in sexual activity without consent. This could also be through the inability to consent, or by pressurisation/ inducement to consent to take part

#### ***Neglect***

Neglect describes the persistent failure of carers or supporters to meet an adults' at risk basic physical or psychological need, likely to result in the serious impairment of health or development

#### ***Discrimination***

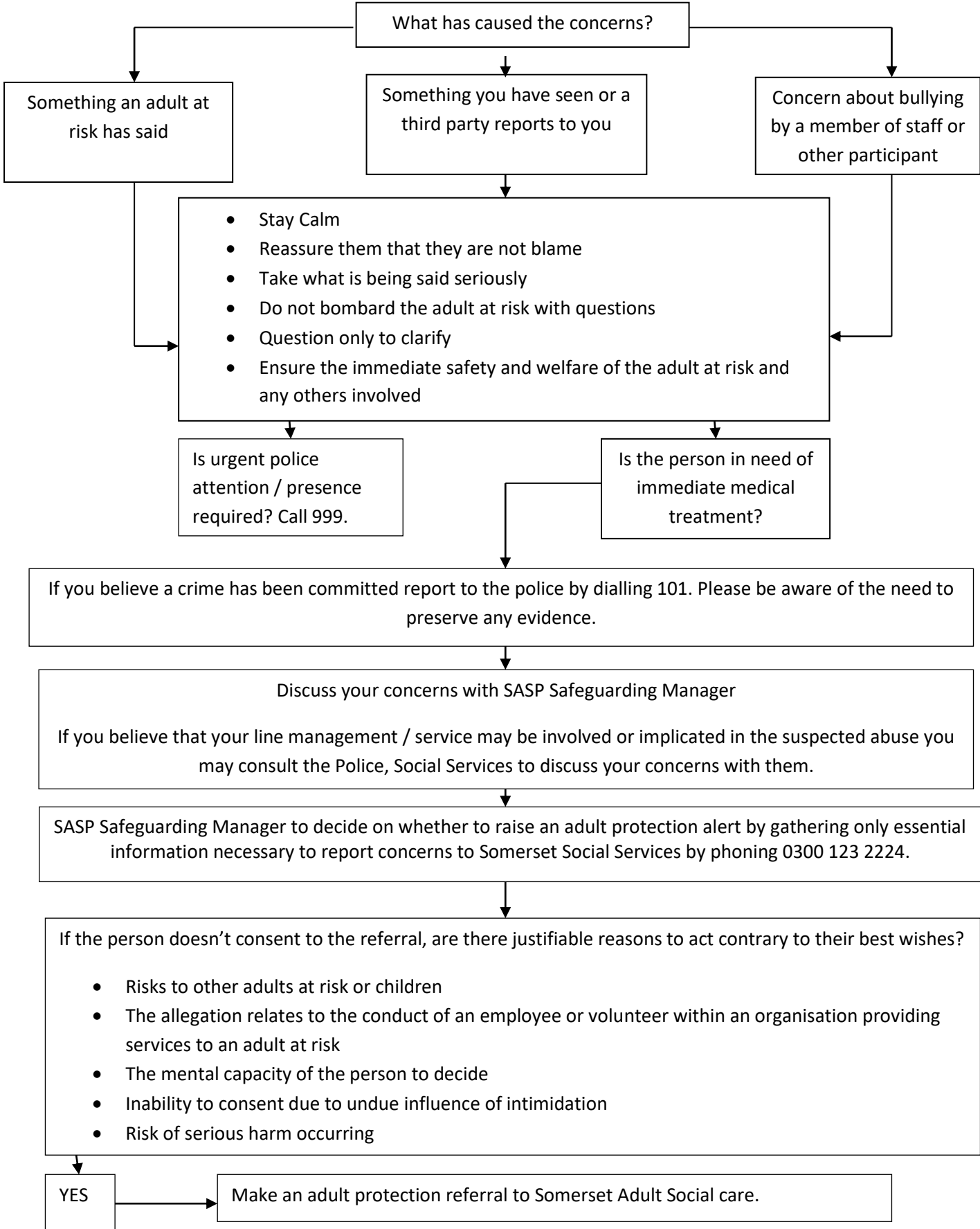
Discriminatory abuse exists when values, beliefs or culture results in a misuse of power that denies mainstream opportunities to some groups or individuals. It includes discrimination on the basis of race, age, gender, sexuality, disability or religion.

#### ***Institutional***

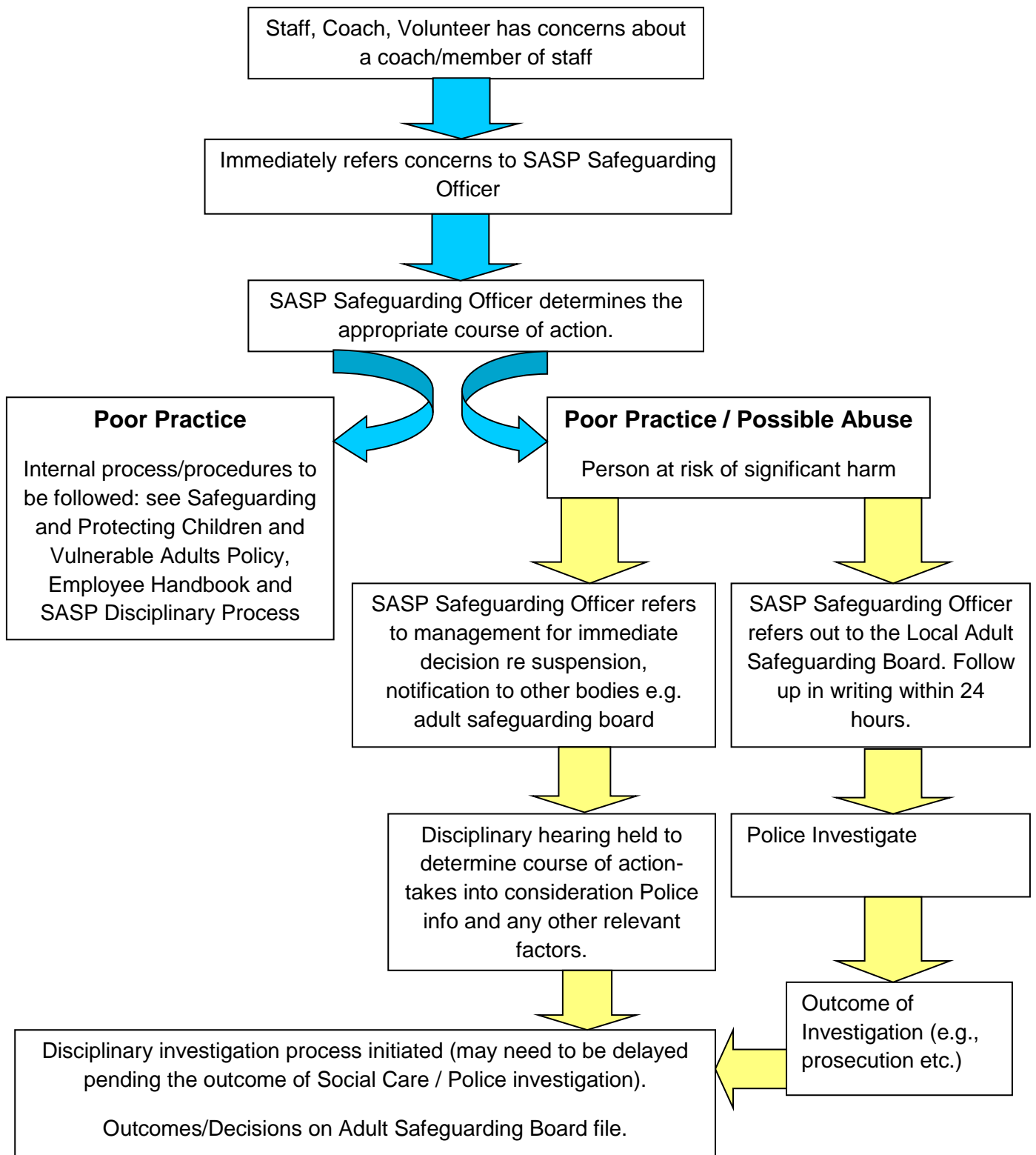
Institutional abuse describes abuse by an organisation imposing rigid and insensitive routines; poor practices embedded in systems, unskilled, intrusive or invasive interventions or any environment allowing inadequate privacy or physical comfort

APPENDIX I

How to respond to a concern



**Flow Chart for Reporting Adult Safeguarding Concerns**



APPENDIX K

Incident Report Template for Concerns related to Adults at Risk	
Form completed by:	
Role in SASP:	
<b>If you are a member of staff that completes a timesheet please complete the section below</b>	
Full Address	
Telephone No.	Home: Mobile:
E mail address	

Alleged Victim Information					
Name					
Date of Birth (if available)					
Address (if available)					
Gender	Male <input type="checkbox"/> Female <input type="checkbox"/>				
<b>Ethnic Origin: (please tick)</b>					
White British		White (other)		African	
Caribbean		Indian		Pakistani	
Chinese		Other (please specify)			
<b>Service User Group : (please tick)</b>					
Older person		Learning Disability		Mental ill health	
Physical Disability		Other (please specify)			
<b>Nature of Alleged Abuse / Concern</b>					
Physical		Psychological		Sexual	
Neglect		Financial/material		Discriminatory	
<b>Please give details (including date(s) and time(s) where possible):</b>					

Location of alleged abuse (please tick)					
Alleged Victims Home		Care Home		Club	
Perpetrators Home		Education Placement		Public Place	
Other (please specify)					

How did the alert arise?

Name of alerter if different to the form completer	Address	Telephone number / e mail

Who is aware of the allegation / concern?

Name of Perpetrator	Address (if known)	Tel / e mail (if known)

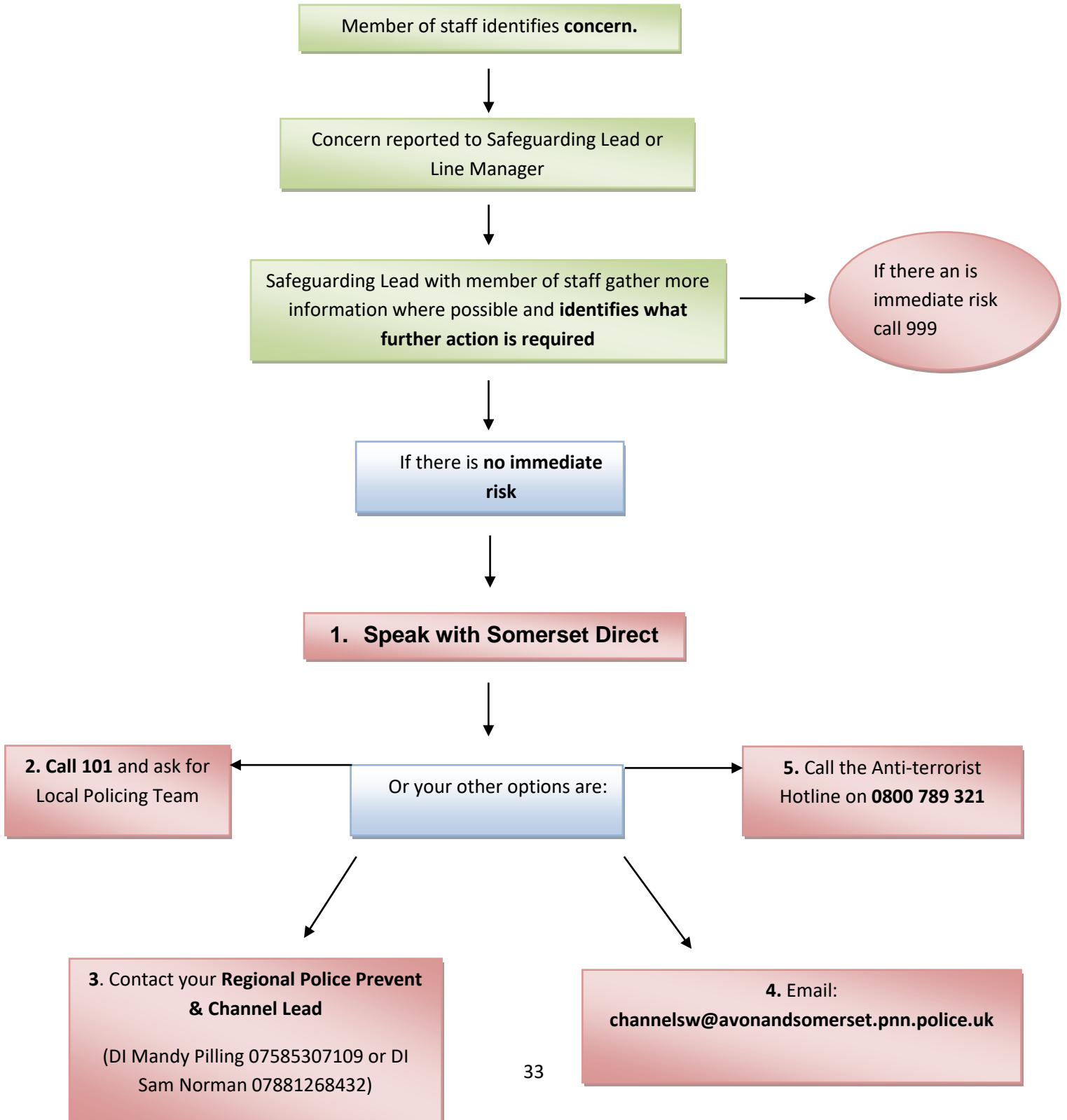
**Please complete and send form to the SASP Safeguarding Manager, Chelston Business Park, Castle Road, Wellington, Somerset TA21 9JQ**



APPENDIX L

**Flowchart for SASP staff reporting a concern of radicalisation with a vulnerable individual**

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:



Further information gathering within SASP and other key agencies that the individual is involved with. Are there shared concerns between partners? Is there a vulnerability to radicalisation?

Yes

No

Police will organise a Multi-Agency Channel meeting which will be made of key partners. The meeting will be chaired by your Local Authority.

If it is deemed there is low risk –further action within normal support. Key agency progresses with further monitoring.

It is important to remember that consent is gained with the individual to be part of Channel support and intervention.

Implement support plan depending on level of risk.

Regularly review process – Channel Panel members work together to review progress and reduce risks.

The individual will exit the Channel process when all partner agencies feel that the vulnerability to radicalisation has been completely removed or significantly lessened.

Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.