Brentford Community Boat House

Adult Safeguarding Policy

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Brentford Community Boat House Ltd - A Company Limited by Guarantee.
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Introduction

Brentford Community Boat House ("**BCBH**") is committed to creating and maintaining a safe and positive environment and we accept our responsibility to safeguard the welfare of all adults involved in our activities in accordance with The Care Act 2014.

BCBH's Adult Safeguarding Policy (the "**Policy**") is mandatory for everyone involved with BCBH. Failure to comply with the Policy will be addressed without delay and may ultimately result in dismissal/exclusion from the Boat House and its facilities.

BCBH will encourage and support partner organisations, including clubs, boroughs, suppliers, and funding bodies to adopt and demonstrate their commitment to the principles and practice of equality as set out in this Policy.

1. Legislation and definitions

The practices and procedures within this Policy are based on the principles contained within UK legislation and government guidance and have been developed to complement the Safeguarding Adults Board's policy and procedures, which take the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- UK GDPR
- Data Protection Act 2018

To assist working through and understanding this policy a number of key definitions need to be explained:

Abuse is a violation of an individual's human and civil rights by another person or persons. See *section 4* for further information.

Adult is anyone aged 18 or over.

Adult at Risk is 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);
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Adults in need of care and support are determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors. Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse. In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors. In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity.

Local safeguarding adults board is a multi-agency partnership responsible for leading the strategic and operational safeguarding adults work within each local authority area)

Making Safeguarding Personal means outcomes are defined by the person at the centre of the safeguarding process. The safeguarding process places a stronger emphasis on achieving satisfactory outcomes that take into account the individual choices and requirements of everyone involved. What this means in practice is that adults should be more involved in the safeguarding process. Their views, wishes, feelings and beliefs must be taken into account when decisions are made.

2. Monitoring of this Policy

The Policy will be reviewed annually, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Adults Board, UK Sport, Home Country Sports Councils or any relevant NGB
- as a result of any other significant change or event.

3. BCBH's Adult safeguarding principles

The Policy aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation or socio-economic background, all adults have a positive and enjoyable experience of participation at BCBH in a safe environment.

The guidance in this Policy is based on the Six Principles of Adult Safeguarding outlined in The Care Act 2014:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.

  "I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

- **Prevention** – It is better to take action before harm occurs.

  "I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

- **Proportionality** – The least intrusive response appropriate to the risk presented.

  "I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."

- **Protection** – Support and representation for those in greatest need.

  "I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

  "I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

- **Accountability** – Accountability and transparency in delivering safeguarding.

  "I understand the role of everyone involved in my life and so do they."

BCBH will seek to ensure that our activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review. The rights, dignity and worth of all adults will always be respected.

4. What to do if you have concerns about an adult

Everybody at BCBH must **be alert** to the abuse of adults. It is important that all staff, members of the Board of Trustees ("**Trustees**") and volunteers **question inappropriate behaviour** or behaviour which is not in line with BCBH's Code of Conduct (attached at *Annex 3*). If you suspect abuse, it is important you **ask for help** by notifying the Welfare Officer, either verbally or in writing. The Welfare Officer will **refer** the matter to any relevant National Governing Body (NGB) and any external agencies (e.g. the Multi-Agency Safeguarding Hub ("**MASH**") or Local Safeguarding Adults Board).

BCBH's **Welfare Officer** is Allan Kunna – cwo@bcbh.org.uk
BCBH's Trustee Designated Safeguarding Lead (TDSL) is Paul Keane- paul@bcbh.org.uk

Be Alert

Even for those experienced in working with adult abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. It is not the responsibility of those working at the BCBH to decide that abuse is occurring, but it is their responsibility to act on any concerns.

There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- A person has belongings or money going missing.
- The person is not attending/no longer enjoying their activities. You may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Someone losing or gaining weight/an unkempt appearance. This could be a participant whose appearance becomes unkempt, does not wear a suitable sports kit and deteriorates in hygiene.
- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you/another person they are being abused i.e. a disclosure.
- Harassing another participant because they have or are perceived to have protected characteristics.
- Not meeting the needs of the participant e.g. training without a necessary break.

- A Coach intentionally striking a participant.
- A fellow participant who sends unwanted sexually explicit text messages to a learning-disabled adult they are participating alongside.
- A participant threatening another participant with physical harm and persistently blaming them for poor performance.

Set out in *Annex 1* is a detailed list of the types of abuse and neglect identified in The Care Act 2014.

Question behaviours

You may have concerns about abuse/poor practice because:

- you see it happening
- you recognise signs such as those listed above.
- someone reports it to you
- an adult approaches you directly.

If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.

If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the Welfare Officer, or, if the Welfare Officer is implicated then report to the alternative Welfare Officer or Trustee DSL.

When raising your concern with the Welfare Officer, remember to make safeguarding personal. It is good practice to seek the adult's views on what they would like to happen next and to inform the adult you will be passing on your concern. It is important when considering your concern that you also ensure to keep the person informed about any decisions and action taken about them and always consider their needs and wishes.

Record all of the above using the form contained at *Annex 2.* When completing the form, you should:

- confine yourself to the facts – what you have observed/seen, heard or had reported to you
- distinguish between your own understanding of events (e.g. what was said, by whom, the circumstances in which this arose, etc.) and what you have been told by others
- not include your own opinions on the matter
- be clear where you are giving either your own or others' interpretation of events and the reasons for this (e.g. context, individual's response to challenge, etc.)

You are recording this information for:

- yourself, so you have a record of what happened
- the Welfare Officer, or the Trustee DSL, who will co-ordinate any action that needs to be taken

It is not appropriate to share sensitive and confidential information with other people (e.g. members of BCBH or acquaintances outside rowing).

Ask for help

The discovery that someone you know may be abusing an adult will raise concern. Although it can be difficult to report such matters, you must remember that:

- being vigilant helps to protect adults
- everyone has a duty of care to report any concerns they have immediately
- A good reporting structure ensures that concerns are dealt with fairly according to procedure and in a timely manner.

Who should I speak to?

As stated above, all concerns that you may have or receive should be recorded using the form contained at *Annex 2* and passed onto one of the Welfare Officer, or the Trustee DSL, who will co-ordinate any action that needs to be taken. They will coordinate with any relevant NGB Lead Safeguarding Officer ("**LSO**") as appropriate. The Welfare Officer is responsible for ensuring that any reports are documented in BCBH's safeguarding folder and that the reporting flow chart at *section 5* is followed.

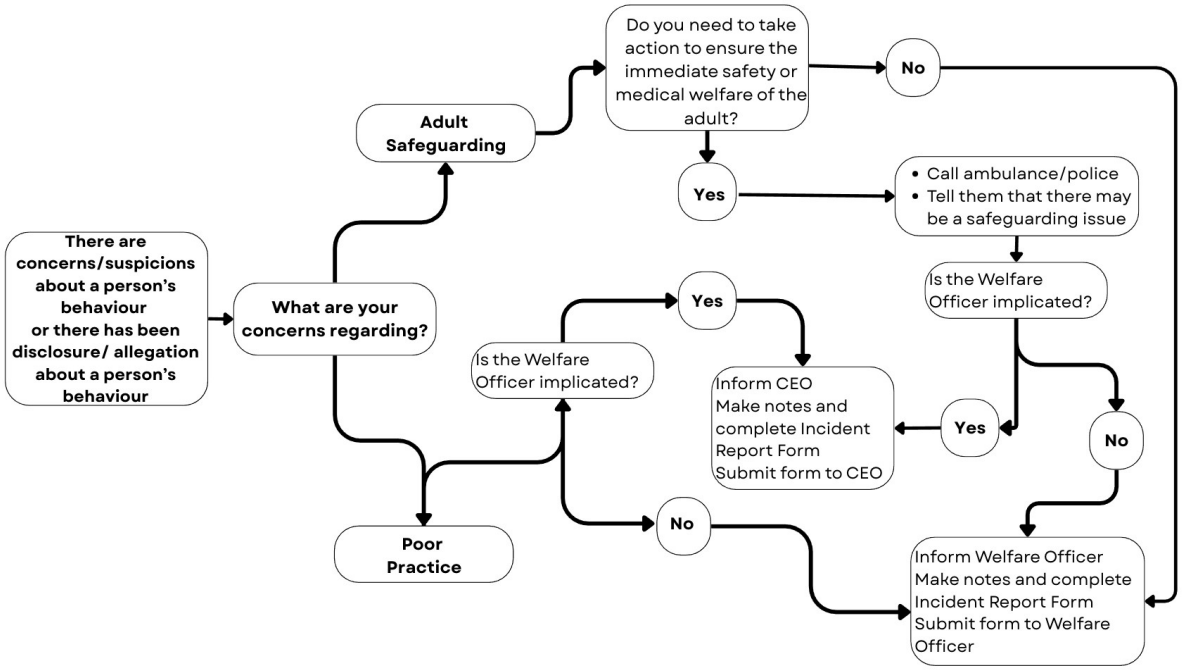
If concerns arise in a setting where you are not at the club (e.g. at an event/race) inform a member of staff. Always ensure, in these circumstances, that BCBH's Welfare Officer is informed of the referral.

Referral

Guidance for the Welfare Officer or in their absence, the Trustee DSL is provided at *Annex 4* (Welfare Officer Reporting Process) and Annex 5 (Reporting to the Charity Commission: Examples Table).

A list of organisations and useful contacts in this area can be found in the Ann Cruft's Safeguarding Adults in Sport and Activity Resources Pack.

1. What to do if you have concerns about an adult (flowchart)



2. Roles and responsibilities

BCBH is committed to having the following in place:

- A Welfare Officer to produce and disseminate guidance and resources to support the policy and procedures.
- A clear line of accountability within the organisation for work on promoting the welfare of all adults.
- Procedures for dealing with allegations of abuse or poor practice against members of staff and volunteers.
- Arrangements to work effectively with other organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Appropriate whistle blowing procedures and an open and inclusive culture that enables safeguarding and equality and diversity issues to be addressed.
- Clear codes of conduct are in place for coaches, participants, officials, spectators and other relevant individuals.

3. BCBH staff behaviour

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental. It is not the responsibility of any individual involved at BCBH to make judgements regarding whether or not abuse is taking place, however, all BCBH staff have the responsibility to recognise and identify poor practice and potential abuse, and act on this in accordance with *section 4* if they have concerns.

BCBH expects that that Coaches:

- Adopt and endorse the BCBH Coaches Codes of Conduct, which can be found at *Annex 3*.
- Have completed a course in basic awareness in working with and safeguarding adults.

Everyone should:

Aim to make the experience at BCBH fun and enjoyable.

- Promote fairness and playing by the rules.
- Not tolerate the use of prohibited or illegal substances.
- Treat all adults equally and preserve their dignity. This includes giving the more talented and less talented members of a group similar attention, time and respect.

4. BCBH staff training

Staff members are to keep up to date with safeguarding requirements and procedures by attending a UK Coaching approved Training Course. Training will enable staff to:

- Identify when adults are at risk.
- Take thorough and effective preventive action.
- Respond in the most appropriate way to adults who are suspected of being abused.
- Report their concerns appropriately.
- Support adults, staff and family members (as appropriate).
- Recognise their responsibilities about suspected poor practice or possible abuse by staff who hold positions of trust within the BCBH.
- Safeguarding training to be completed within the first week of induction.

Every member of staff:

- Have undertaken an enhanced Disclosure and Barring Service (DBS) record check every three years.
- An employee holding a Coaching position is required to hold (or be working towards) a UKCC Level 2 Rowing Coaching qualification, completed UK Coaching Safeguarding and Protecting Children course, and have up to date first aid certificates.

The above will be monitored via the Staff Certification Matrix. Records of training attendance and content will be kept by the Welfare Officer.

5. Recruitment

Recruitment process

The key stages of BCBH's recruitment process are as follows:

- Scope out the role
- Invite potential candidates for interview
- Interview and documentation review
- Successful interviewees shadow staff prior to engagement (where appropriate)
- Advanced DBS check is completed
- Contract signed
- The candidate is reviewed against a training matrix to identify areas for development.
- Safeguarding training is completed within the first week of induction.

Application process

Every prospective employee will be expected to:

- Complete an application form. This will help assess the applicant's suitability to work with children based on their skills and competencies as well as eliciting information about an applicant's past
- Provide a self-disclosure about any matter that might influence their suitability to work with adults at risk.
- Provide two referees
- Provide details of previous volunteering experience or relevant employment
- Provide evidence of their identity (such as a photographic driving licence or passport)
- Complete a Disclosure and Barring Service (DBS) criminal records check at the enhanced level for the specific role.

6. Online and communications safeguarding

Staff are expected to make all social media accounts private enabling no visibility for any unknown person.

7. External agency relationships

BCBH will maintain a good working relationship with the police, and be familiar with the laws that serve to protect from abuse. BCBH will consult with the police (and other appropriate agencies that have specialist knowledge) to help BCBH protect from abuse.

8. Consent, information sharing and data protection

Staff should always share safeguarding concerns in line with this Policy. As long as it does not increase the risk to the individual, BCBH staff should explain to the affected individual that it is their duty to share their concern with the Welfare Officer.

The Welfare Officer will then consider the situation and plan the actions that need to be taken, in conjunction with the adult at risk and in line with this Policy and the Local Safeguarding Adults Board's policy and procedures.

9. Complaints and comments

If you have any complaints, comments or suggestions about this Policy, please email the BCBH Admin, admin@bcbh.org.uk. Or alternatively contact the chief welfare officer cwo@bcbh.org.uk.

Annex 1: Abuse

Types of abuse and neglect

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be an exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern.

- **Self-neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

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

- **Domestic Abuse and coercive control** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.

- **Discriminatory Abuse** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

- **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Physical Abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

- **Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

- **Emotional or Psychological Abuse** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Not included in the Care Act 2014 but also relevant:

- **Cyber Bullying** – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means ;to do it.

- **Forced Marriage** – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. The forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.

- **Mate Crime** – a 'mate crime' as defined by the Safety Net Project as 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

- **Radicalisation** – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Annex 2: Incident Reporting Form

Section 1 – details of adult at risk	
Name of adult	
Address	
Date of Birth	
Age, if date of birth not known	
GP practice (if known)	
Contact number	
Section 2 – your details	
Name	
Contact phone number(s)	
Email address	
Line manager or alternative contact	
Name of Organisation	
Your role in organisation	

Section 3 – details of concern
Detail what you have seen/been told/other that makes you believe the adult is being abused or is at risk of abuse (include dates/times/evidence from records/photos, etc.)

Section 4 - Abuse type(s) – please tick as many as you feel may apply		
Physical	Psychological	Financial
Sexual	Discriminatory	Organisational (formerly institutional)
Neglect	Hate incident/crime	Mate Crime
Internet abuse	Modern slavery	Female genital Mutilation (FGM)
Forced Marriage	Domestic abuse	Radicalisation
Self-Neglect		

Section 5 - Have you discussed your concerns with the adult? What are their views, what outcomes have they stated they want (if any)?

Section 5A – Reasons for not discussing with the adult	
Adult lacks capacity	
Adult unable to communicate their views	
Discussion would increase the risk	
State why the risks would increase	

Section 5B - Have you discussed your concerns with anyone else? E.g. carer/ relative. **What are their views?**
Section 6 – What action have you taken/agreed with the adult to reduce the risks?

Information passed to Welfare Officer, confirm details:	Referral to Social Care Confirm details:
Contact with the police, confirm details:	Referral to other agency – please confirm details:

Other – please state what
No action agreed – state why
Section 7 – Risk to others
Are any other adults at risk Yes/No – delete as appropriate
If yes state why and what actions have been taken to address these?
Are any adults at risk Yes/No Delete as appropriate

If yes, state why and what actions have been taken to address these?
Signed:
Date:

OFFICE USE ONLY
Section 8 – sharing the concerns (To be completed by Welfare Officer)
Details of your contact with the adult at risk. Have they consented to information being shared outside of BCBH?
Details of contact with the Social Care Team where the adult at risk lives –advice can be still sought without giving personal details if you do not have consent for a referral
Details of any other agencies contacted
Details of the outcome of this concern

Annex 3: Code of Conduct

Coaching Policy

Coaches should ensure safe practice at all times

- follow British Rowing water safety guidance and specific BCBH safety policies and procedures
- coaches should ensure that the environment is as safe as possible by assessing and managing risk to an appropriate level
- promote the execution of safe and correct practice.

Coaches should look to continually develop their practices

- accept that improvements in their coaching can always be made
- gain qualifications at a level appropriate to their coaching context
- follow a programme of continuous professional development
- engage in self-analysis and reflective practice to identify areas for personal improvement
- practice in an open and transparent fashion that encourages other coaches to contribute to or learn from their knowledge and experience
- contribute to the development of coaching by sharing knowledge and ideas with others
- contribute to initiatives to promote the standards and quality of coaching and coaches
- learn about issues in the sport that might affect coaches or participants
- learn about the role of rowing in current local, regional and national initiatives.

Coaches should make a commitment to providing quality coaching service to participants

- plan and prepare for all sessions so that they meet the needs of participants and are appropriate and progressive
- maintain appropriate records with regard to participants
- support talent.

Coaches should follow Brentford Community Boat House guidelines on coaching and safeguarding children and adults at risk

- ensure that any physical contact is appropriate and necessary and is carried out within recommended guidelines, and with the participant's full consent and approval
- avoid any form of sexually related contact, innuendo, flirting or inappropriate gestures when coaching, particularly with under-age participants
- avoid sexual intimacy with participants either whilst coaching them, and also in the period of time immediately following the end of the coaching relationship
  arrange to transfer a participant to another coach if it is clear that an intimate relationship is developing.

Coaches should coach in a participant focused way

- promote the welfare and best interests of participants
- assess each individual's needs, and support individuals to determine their goals
- recognise and accept when it is in the participant's interest, to refer a participant to another appropriate coach or specialist
- assist the participant to access other appropriate services that could aid their development
- recognise the rights of participants to confer with other coaches and experts
- communicate and co-operate with other organisations and individuals in the best interests of the participants
- obtain the agreement of coaches and participants when taking over some or all coaching responsibility
- be aware of and communicate any conflict of responsibility as soon as it becomes apparent
- be aware of the physical needs of participants, especially those still growing and ensure that training loads and intensities are appropriate
- maintain the same level of interest when the athlete is sick or injured.

Coaches should coach in a professional manner

- be transparent and accountable in their coaching practices
- be professional and accept responsibility for their actions
- clarify from the beginning of the coaching relationship what is expected of the participants and also what they can expect from the coach
- allow athletes access to an appropriate complaints mechanism
- respect the individual's right to transfer between clubs, coaches or other sports
- only assume roles for which they are qualified and prepared
- not misrepresent their level of qualification or experience
- seek out a balance between coaching and lifestyle commitments to maintain an effective and enjoyable coaching career.

Coaches should ensure that rowing is a positive recreational activity

- create an environment free of fear and harassment
- help to maintain enjoyment of rowing
- promote the concept of a balanced lifestyle, supporting the well-being of the athlete both in and out of the sport
- aid participants' motivation
- avoid placing undue pressure on children ensure that the ability and performance of the child in sport is not excessively linked with their own perceptions of self worth.

Coaches should promote rowing and health

- actively promote the benefits of participation in rowing
- promote drug-free sport
- educate participants on the British Rowing policy on the use of performance enhancing drugs and supplements
- promote health
- avoid smoking, drinking or drug use before or whilst coaching, as this portrays a negative image and could affect the safety of participants in rowing.

Coaches should encourage personal empowerment

Coaches should:

- recognise the rights of all participants to be treated as individuals
- allow participants to express their own views and make their own decisions
- canvass and respect participants' reasons for rowing, even if they consider fun and participating more important than winning
- ensure that participants are fully informed of the requirements of the sport and the coaching programme
- respect participants' opinions when making decisions about their participation in the sport • encourage participants to take responsibility for their own development and actions
- involve participants as part of the decision making process.

Coaches should communicate appropriately

- follow the guidelines in the British Rowing Safeguarding and Protecting Children Booklet regarding communication with parents and young people
- communicate with and provide feedback to participants in a manner which reflects respect and care
- avoid criticising, or engaging in demeaning descriptions of others
- be discreet in any conversations about participants, coaches or other individuals • discuss and agree with participants what information is confidential.

Coaches should establish expectations

- clarify the nature of the coaching services being provided for participants inform participants and parents of juniors of the requirements of the sport

- discuss with parents and other relevant parties the potential impact of the coaching programme on junior participants
- inform athletes or their parents of any potential costs in accessing their coaching services.

Coaches should be positive role models

- model, and promote adherence to, the codes of conduct
- display high standards in the use of language, manners, punctuality, preparation and presentation
- operate within the rules and spirit of rowing
- promote the positive aspects of the sport
- challenge and not condone discrimination on the grounds of gender, race, colour, disability, sexuality,
- age, religion, political opinion, occupation or marital status in the coaching environment
- treat all individuals in the sport with respect at all times, and be fair, honest and considerate
- display control, respect, dignity and professionalism to all involved in rowing
- encourage mutual respect between participants in the sport
- promote tolerance
- act equitably in their coaching and combat discrimination on the basis of gender, age, race, colour, sexual orientation, political opinion etc
- act in a non-violent way
- address any bullying between participants.

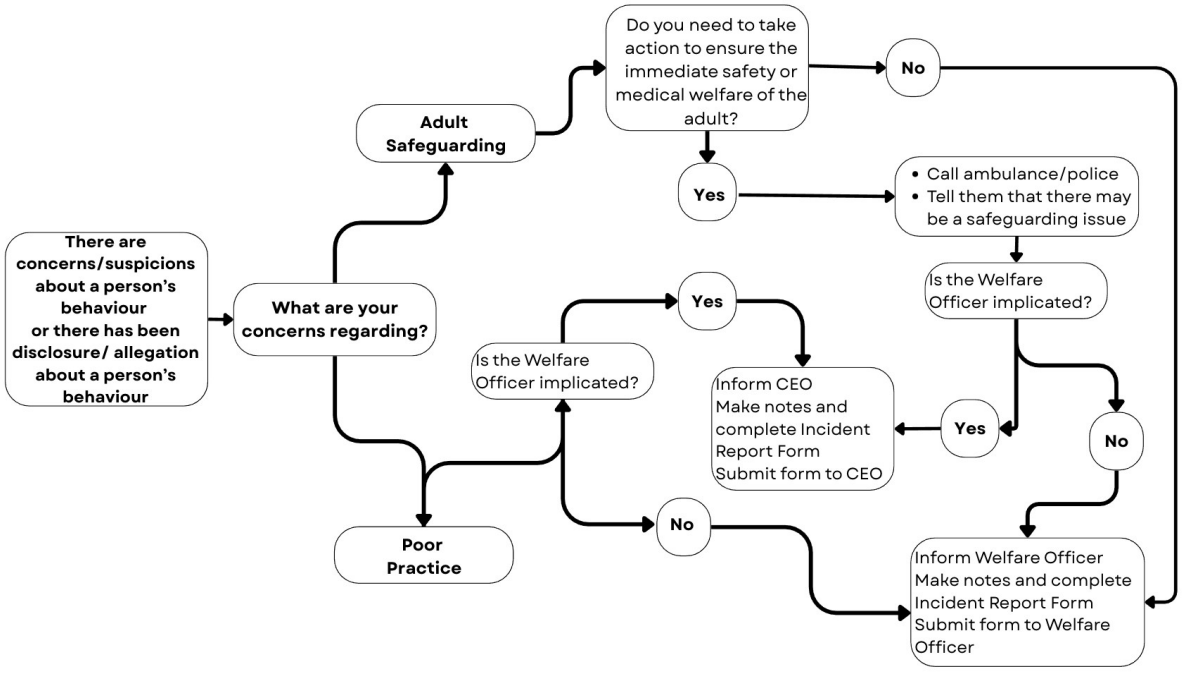
Coaches should be models of positive behaviour

- act with respect for the opposition
- condemn cheating

-

Annex 4: Welfare Officer Reporting Process

This annex sets out in detail the safeguarding referral process and guidance for Welfare Officers. Below is a simple diagram setting out the basic reporting process depending on whether the matter concerns adult safeguarding or poor practice.



If applicable Contact the NGB LSO

The NGB LSO must be informed of all allegations of abuse and persistent poor practice as soon as possible in order to decide the following:

- what further action should be taken by the relevant partner organisation or National Governing Body
- whether further action, advice or investigation is needed by/from the Police, Children's Social Care Services or the NSPCC.

Passing on this information is important because the matter may be just one of a series of other instances which together cause concern. It enables the NGB's Case Management Group and Safeguarding Vulnerable Groups Panel to analyse trends across clubs and improve existing British Rowing policy and guidance.

Telephone contact for the NGB LSO is listed below British Rowing. Tel: 0208 237 6700.
Paddle UK. Tel: 01158655354

The LSO or another designated person from NGB will keep you notified of procedures and timescales whilst any investigation is ongoing.

Disclosure of previous abuse

Allegations of abuse are occasionally made some time after the event, for example by an adult abused as a child by a member of staff who is still working with adults. Where such a disclosure is made, a referral should be made to MASH, as identified in the process set out above.

If an allegation is made against a person who holds a position of trust (or used to) this should be referred by the Welfare Officer to the Local Authority Designated Officer (LADO).

Allegations against People in Positions of Trust

- When an allegation against a person in a position of trust is reported, BCBH will follow the relevant NGB protocol after making its own decision on the allegation, this will be in line with BCBH's disciplinary procedures.
- If an individual is suspended from their role it is important to remember this is a neutral act, it protects all parties involved in the case.
- They will be assigned a designated contact from the relevant NGB. This person will be their point of contact for the duration of the case, if they have any queries or concerns they should contact them initially.
- The individual's designated contact will be neutral to the case, they will not be the designated contact for the young person involved in the case, nor will they be a member of NGB's Case Management team who will be dealing with your case.
- The individual will receive regular communication in the form of telephone calls, letters and emails regarding their case from their designated contact. They will be kept up to date with the progress of their case at all times.

If a case is being investigated by a statutory agency, BCBH or the relevant NGB may suspend the individual concerned whilst this investigation is taking place. This is a neutral act and is not intended to prejudge the outcome of the investigation, but simply to remove the individual from contact with children until the investigation is concluded. Once the statutory agency's investigation is completed, and irrespective of its findings, BCBH or/and the NGB will assess the case following its disciplinary procedures.
Please refer to the relevant NGB policy on disciplinary procedures for more information.

Involving the Charity Commission

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within BCBH, it is important that there is prompt, full and frank disclosure to the Charity Commission. It is the **responsibility of the Trustees** to decide whether an incident is significant and should be reported.

Any report needs to include what happened and how the matter is being dealt with (even if BCBH has also reported it to the Police, donors, etc.)

To help assist in determining reportable matters, there is an Examples Table at *Annex 5*. The Examples Table is not a definitive list of reportable incidents but indicates the types of incidents that should and should not be reported. Further information on reporting to the Charity Commission can be found here.

Consent, information sharing and data protection

Staff should always share safeguarding concerns in line with this Policy. As long as it does not increase the risk to the individual, BCBH staff should explain to the affected individual that it is their duty to share their concern with the Welfare Officer.

The Welfare Officer will then consider the situation and plan the actions that need to be taken, in conjunction with the adult at risk and in line with this Policy and the Local Safeguarding Adults Board's policy and procedures.

To make an adult safeguarding referral you need to call the local safeguarding adults' team. This may be part of a MASH (Multi-Agency Safeguarding Hub). A conversation can be had with the safeguarding adult's team without disclosing the identity of the person in the first instance. If it is thought that a referral needs to be made to the safeguarding adult's team, consent should be sought where possible from the adult at risk.

Individuals may not give their consent to the sharing of safeguarding information with the safeguarding adult's team for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view on whether it is best to share information.

If they still do not consent, then their wishes should usually be respected. However, there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people or a serious crime has been committed. This should always be discussed with your safeguarding lead and the local authority safeguarding adults team.

If someone does not want you to share information outside of the organisation or you do not have consent to share the information, ask yourself the following questions: · Is the adult placing themselves at further risk of harm? · Is someone else likely to get hurt? · 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.

Is there suspicion that a crime has occurred?

If the answer to any of the questions above is "yes" then you can share without consent and need to share the information.
When sharing information there are seven golden rules for internet sharing that should always be followed (see HM Government Information Sharing: Guidance for practitioners and managers for further details):

1. **Remember** that the Data Protection Act 2018 is not a barrier to sharing information but provides a framework to ensure personal information is shared appropriately, except in circumstances whereby doing so places the person at significant risk of harm.
2. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
4. **Share with consent where appropriate** and 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. You will need to base your judgement on the facts of the case.
5. **Consider** safety and well-being - Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
6. **Accurate, necessary, proportionate, relevant and secure** - Ensure all information shared is accurate, up to date; necessary for the purpose for which you are sharing it, is shared in a timely fashion, and is shared securely.
7. **Keep a record** - Record your decision and reasons to share or not share information.

Annex 5: Reporting to the Charity Commission: Examples Table

SERIOUS INCIDENTS TO REPORT	INCIDENTS NOT TO REPORT
Protecting people and safeguarding incidents	

A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer A staff computer is found to contain images of child pornography An internal investigation has established that there is a widespread culture of bullying within the charity A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position Repeated medication errors to beneficiaries in a care home indicating a systemic problem	Minor unusual/aggressive behaviour by a beneficiary towards a member of staff Police called to charity premises because a beneficiary is drunk and disorderly Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity's reputation Beneficiary in a care home received the wrong medication as a 'one-off' error and there was no significant harm Logged accident book reports where there was no significant harm to individuals Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals Minor accidental injury to a charity service user e.g. slipping on a wet floor A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed). A staff member who is not in a senior position or position of specific responsibility is dismissed for marrying a member of the community in which

SERIOUS INCIDENTS TO REPORT	**INCIDENTS NOT TO REPORT**

Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register	the charity is working, in breach of the charity's code of conduct but not in breach of local laws
Fraud, cyber-crime and money laundering	
Charity's Chief Executive and Treasurer produced false invoices for charity services A bogus fundraising scheme is being promoted online, using charity's name Charity funds lost due to an online or telephone 'phishing scam', where trustees were conned into giving out bank account details Attempted fraud by a member of charity staff but intercepted by internal financial controls Any actual/alleged fraud or money laundering should be reported. Any actual/alleged cyber-crime should be reported with the exception of the example in the right hand column	Attempted cyber-crimes that are blocked by the charity's computer network security systems, except where the attempted cyber-crime is unusual in nature and the charity wants to bring it to the attention of the Commission
Theft	

Each month, between £100-£200 goes missing, suspected stolen, from the cash till in the charity shop. It has been going on for six months and has been reported to the police. Charity office has been broken into and computers, holding personal details of beneficiaries and donors, stolen Remember, there is no minimum loss figure that should be reported. You need to decide whether incidents are serious enough to report, in the context of your charity and its income, taking account of the actual harm and potential risks posed Unverified or suspicious donations A significant amount over £25,000 is donated to the charity from an unknown or unverifiable source	One-off random theft of items such as jewellery or a mobile phone at the charity's premises Theft of small amounts of cash belonging to a beneficiary, by another beneficiary, at a charity event Theft of a collection tin thought to contain small amount of cash Large legacy left in a will, received via solicitor dealing with probate, on condition donor remains anonymous Large donation made by an anonymous donor via solicitor who is aware of their identity Low value donations from unknown sources - refer to our guidance on due diligence and monitoring end use of funds

SERIOUS INCIDENTS TO REPORT	**INCIDENTS NOT TO REPORT**
Other significant financial loss	

Significant loss of charity funds in a poor investment scheme, commissioned by trustees, without professional advice Sudden loss of 20% or more of charity's income (e.g. due to termination of major donor contract); charity has no reserves, meaning staff will be laid off and services stopped Substantial loss of charity funds due to legal costs incurred in a court case; excludes those charities routinely undertaking budgeted litigation on behalf of beneficiaries The charity's main premises is severely damaged in a fire and the charity is unable to deliver services to its beneficiaries	Loss of charity funds where the value lost represents less than £25,000 of charity assets and is less than 20% of the charity's income. There is no significant impact on the charity's services. Charity property overseas is damaged due to bad weather conditions (e.g. office roof blown off during a storm) but doesn't prevent charity from delivering services to beneficiaries A vehicle owned by the charity is badly damaged in an accident. Nobody was hurt, the damage is covered by insurance and the charity is still able to deliver services to its beneficiaries
Links to terrorism or extremism	
Charity discovers that an overseas partner has passed money to a member of charity's personnel who is a designated individual, subject to financial restrictions A member of charity staff or volunteer has been arrested for terrorism related offences Charity's warehouse in a war zone has been raided and vehicles/ stock taken at gunpoint Charity personnel have been detained or kidnapped by a terrorist group overseas A visiting speaker has used a charity event to promote extremist messages, via live speech or social media	
Other significant incidents - Disqualified person acting as a trustee	

Any person acting as a trustee or senior manager while disqualified – refer to the Commission's guidance	A trustee or senior manager voluntarily steps down from trusteeship when disqualified for having an IVA (Individual Voluntary Arrangement)

SERIOUS INCIDENTS TO REPORT	**INCIDENTS NOT TO REPORT**
Charity subject to investigation by a regulatory body	
Charity is subject to official investigation by another regulator e.g. Fundraising Regulator, Police, UK Visas & Immigration, Ofcom, Information Commissioner, Care Quality Commission or Care Inspectorate Wales	Routine inspections by a sector regulator e.g. Ofsted, CQC or CIW, do not need to be reported to the Commission unless there are adverse findings that place the future of the charity in doubt, relate to other categories of serious incidents or are likely to attract negative media attention
Major governance issues	
Mass resignation of trustees, leaving the charity unable to function Evidence that trustees have routinely signed blank cheques	One or two trustees stepping down at year-end, due to other commitments
Fundraising issues	

Suspicions of unauthorised public collections in the name of the charity Charity hasn't complied with law on requirements for solicitation statements or professional fundraising agreements Significant funds, due under a fundraising arrangement, have not been paid by the professional fundraiser, or commercial partner to the charity Incident has taken place involving a fundraising agency which will incur serious damage to the charity's reputation	A missing collection tin thought to contain a small sum of money Failure of a sponsor, e.g. of a local fun run, to submit small amounts of money raised for the charity
Data breaches or loss	
Charity's data has been accessed by an unknown person; this data was accessed and deleted, including the charity's email account, donor names and addresses	A charity laptop or mobile phone (not containing confidential data) has gone missing – it's been reported to the police
SERIOUS INCIDENTS TO REPORT	**INCIDENTS NOT TO REPORT**
A charity laptop, containing personal details of beneficiaries or staff, has been stolen and there is no encryption or other security measures that would prevent the perpetrator from accessing this information A Data Protection Act breach has occurred and been reported to the ICO	
Incidents involving partners	

A delivery partner of the charity is alleged to have links to terrorism and extremism A delivery partner of the charity has ceased to operate and this has prevented the charity from providing assistance to its beneficiaries The charity's subsidiary trading company has gone into liquidation and this has resulted in financial difficulties which place the future of the charity in doubt Staff of another organisation within the same federated structure are found to have been committing systematic abuse of beneficiaries and this has significantly damaged the reputation of the charity	A serious incident has taken place involving a partner but it has no or minimal impact on the charity's reputation or the partner's ability to deliver its work with the charity A delivery partner of the charity has ceased to operate and this has had some impact on the charity's ability to provide assistance to its beneficiaries but it is not a material impact and the assistance to beneficiaries hasn't stopped
Other, including criminality	
Any other type of incident that appears serious and likely to damage reputation or incur loss of charitable funds/assets	