

# THE PROJECT CLIMBING CENTRE

## *SAFEGUARDING PROCEDURES*

# Safeguarding Procedures Revision

## 2.0

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**28 SEPTEMBER 2021**

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## Overview

OverExposure Sports Ltd is committed to ensuring that we provide an environment where all vulnerable people can enjoy their sport in a safe and supportive environment. This document sets out the processes and procedures that we have put in place to ensure this is the case.

We encourage anyone who is bringing a vulnerable person to our centre to read this document which is freely available on our website and which will be e-mailed to any person wishing to keep a copy for their own reference. As with any of our policy documents, we welcome questions, comments, and suggestions which may help us to improve our service, and, particularly in this instance, the standards of safety that we are able to uphold. Please direct any such questions or comments to [safety@theprojectclimbingcentre.co.uk](mailto:safety@theprojectclimbingcentre.co.uk) marking your e-mail FAO: Safeguarding Officer

*These procedures have been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation is available from [www.nspcc.org.uk/learning](http://www.nspcc.org.uk/learning)*

## Review

As with all of our Policies and Procedures this document is reviewed and updated at least annually and sooner if pertinent information comes to light.

This policy was last reviewed on: 27/09/2021

## Introduction

### **What is this document for?**

The purpose of the document is to help ensure that our operating procedures and practices:

- take appropriate responsibility for protecting vulnerable people from abuse
- minimise as far as reasonably possible the risk that those taking part will suffer serious accidental injury
- take into account the specific safeguarding issues involved in working with young adults up to the age of 25
- are enjoyable, adventurous and rewarding for all involved
- comply with legislation and national guidance across the four nations of the UK.

### **Who is this document for?**

This document is designed to help anyone working on behalf of OverExposure Sports Ltd, including senior managers, board members, paid staff, volunteers, sessional workers, agency staff and students to fulfil their safeguarding responsibilities.

### **What's new in this document?**

We have undertaken a full review of our Safeguarding Policies within OverExposure Sports from the very top of the organisation all the way down and this new document is the result of that work. The primary change is a change in layout and language to make this extremely important document more easily accessible and understandable to everyone who is involved with vulnerable people in our centre.

Naturally this review has also presented us with an opportunity to update references to legislation, guidance and to ensure that contact details are current and correct.

Additionally changes to data protection law have had an impact on some areas of this Policy.

### **Use of terminology**

Throughout this document we have chosen to use language that makes it easier to read and understand. As such wherever we refer to “a vulnerable person” or “vulnerable people” this also applies to children, young adults, vulnerable adults and anyone else who may be owed a higher duty of care.

We use the terms “safeguarding”, “promoting children’s welfare” and “child protection” in a way that is consistent with Working Together 2018, which defines “safeguarding and promoting the welfare of children” as:

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best life chances.

Working Together 2015 also defines “child protection” as:

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm

We use the term “safeguarding young adults at risk” in a way that is consistent with the safeguarding section of The Care and Support Statutory Guidance (Section 1 of the Care Act 2014) (updated June 2020). The Guidance clarifies that safeguarding duties apply in respect of any adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs), and
- is experiencing, or at risk of, abuse or neglect, and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

### **Access to and Review of our Policies**

All Policies and Documents referred to in this document are freely available to anyone who wishes to have a copy.

We are committed to ensuring we maintain the highest possible levels of safeguarding and so our Policies are reviewed annually.

### **Designated Officers**

It is the responsibility of the Designated Safeguarding Officer (DSO) to;

- Coordinate concerns about young people
- Support those working with young people
- Put Safeguards in place
- Act on reports of concern

All concerns about a child should be reported to the DSO.

Our DSO is Richard Smith. Any concerns regarding safeguarding should be passed to Richard using the e-mail address [safety@theprojectclimbingcentre.co.uk](mailto:safety@theprojectclimbingcentre.co.uk). E-mails should be marked as Confidential and FAO Safeguarding Officer.

In the event of an urgent case where the DSO is not available then the Duty Manager or Duty Instructor should be contacted.

Our Board of Directors takes Safeguarding extremely seriously. The Safeguarding Lead at Board Level is Freddie Naish.

## Our Commitments

We believe that vulnerable people should never experience abuse of any kind and that we have a responsibility to promote the welfare of all vulnerable people, to keep them safe and to operate in a way that protects them.

We recognise that the welfare of the vulnerable person is paramount. All vulnerable people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse. Some vulnerable people are particularly at risk because of the impact of previous experiences, their level of dependency, communication needs or other issues. Working in partnership with vulnerable people, their parents, carers and other agencies is essential in promoting their welfare.

We will seek to keep vulnerable people safe by;

- valuing, listening to and respecting them
- appointing a Designated Safeguarding Officer (DSO) for vulnerable people, a deputy and a lead board member for safeguarding
- adopting good practice through our policies, procedures and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing information professionally and securely sharing information about safeguarding and good practice with vulnerable people, their families, staff and volunteers via leaflets, posters, group work and one-to-one discussions
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving vulnerable people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for vulnerable people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

## Our Standards

Our Safeguarding approach is based on a set of six standards that have been developed by the NSPCC. These standards are as follows:

- safer staff and volunteers

- child protection and protecting young adults at risk
- preventing and responding to bullying
- avoiding accidents and running safe activities and events.
- recording and storing information
- sharing information and working with other agencies.

# 1: Recruitment, Induction and Supervision

This section sets out our practices for recruiting new staff and volunteers and introducing them to their role within our organisation to help them carry out their duties safely. For full details of our Recruitment Policy please see the relevant documents.

## Recruitment

We have a written recruitment and induction policy which includes a section on the recruitment of ex-offenders. Each position within the company has a clear Person Specification, Job Description, and Position Agreement. All positions are advertised online and an accompanying Information Pack is made available to all interested applicants. Alongside our requirement for a Covering Letter and C.V we also use a standard application form that all applicants must complete. All applicants must complete a Self-Declaration form upon applying. Shortlisting is carried out by a panel of no fewer than 3 people and face-to-face interviews are carried out by at least 2 people. All applications are subject to our standardised appraisal and scoring systems to ensure that applicants are treated fairly and that they will be a good fit for our culture.

## Checks and References

All applicants must provide a minimum of 2 references before they can start work with us. All applicants must provide proof of identity using an original document and must provide original copies of any qualifications they hold. Enhanced DBS checks and barred list checks are carried out on all eligible staff.

We do not store copies of DBS Check Certificates unless there is a dispute about the results of the check. Instead, a confidential record is kept of:

- the date the check was completed
- the level and type of check (standard/enhanced/barred list check and the relevant workforce)
- the reference number of the certificate
- the decision made about whether the person was employed (with reasons).

If there is a dispute about the results of a check, we keep a copy of the certificate for no longer than six months.

## Inductions

We have a written induction process for all new staff which must be completed and signed off before staff are signed-off to work without direct supervision. Our induction process includes basic Safeguarding Training based on the correct use of this Policy document. All new staff must complete their additional Safeguarding Training within 4 weeks of starting work with us. All positions are subject to probationary periods.

## Ongoing Support and Training

Training is offered to all staff on an ongoing basis. All staff must complete Safeguarding Training at least annually in order to ensure they are up to date with our Policies and with best practices more broadly.

Available Safeguarding Training Opportunities

- BMC/UK Coaching Safeguarding Workshops
- NSPCC Online Course

In addition to those opportunities listed above OverExposure Sports will support staff in pursuing further learning and development in this area; should a staff member find a Safeguarding Course that is outside of our normal pathways we will be happy to support staff in accessing that training.

## 2: Protecting Children and Young Adults at Risk

This section sets out the measures that are in place to protect and support children, young people and young adults known to the group or organisation who are identified as being at possible risk of abuse and neglect.

### Codes of Conduct

Alongside this main Policy Document we have four additional Codes of Conduct which have been created in order to make clear the behavioural expectations we, as an organisation, have of our different user groups and of our staff;

- Code of Conduct for Staff and Volunteers
- Code of Conduct for External Instructors
- Code of Conduct for Children and Young People
- Code of Conduct for Parents and Carers

### Dealing with Disclosures and Concerns

It is not the responsibility of anyone working in the Centre to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns by reporting these to the appropriate officer or the appropriate authorities.

Where concerns are registered we will keep an accurate record of:

- the date and time of the incident/disclosure
- the date and time of the report
- the name and role of the person to whom the concern was originally reported and their contact details
- the name and role of the person making the report (if this is different to the above) and their contact details
- the names of all parties who were involved in the incident, including any witnesses to an event what was said or done and by whom
- any action taken to look into the matter
- any further action taken (such as a referral being made)
- the reasons why the organisation decided not to refer those concerns to a statutory agency (if relevant).

*Make sure the report is factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such. The record should always be signed by the person making the report.*

The easiest way to ensure that all of the necessary information is recorded is to use our Safeguarding Report Form.

Keeping these records will enable us to give accurate information if we are ever asked for it. For example:

- in response to future requests for a reference
- if a future employer asks for clarification about information disclosed as part of a vetting and barring check
- if allegations resurface after a period of time.

## Early Help Services and Preventative Measures

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising

## Abuse and Neglect

Child abuse happens when a person harms a child. It can be physical, sexual or emotional, but can also involve neglect.

Children may be abused by:

- family members
- Friends
- people working or volunteering in organisational or community settings
- people they know
- strangers.

Children experiencing abuse often experience more than one type of abuse over a period of time. Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs.

These include a child:

- being afraid of particular places or making excuses to avoid particular people
- knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- having angry outbursts or behaving aggressively towards others
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming or having thoughts about suicide
- showing changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes
- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries.

*These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents or carers.*

## Allegations against Staff Members and Volunteers

Sometimes concerns might be raised about an adult who works or volunteers with children.

This could be because they've;

- behaved in a way that has harmed, or may have harmed, a vulnerable person
- committed a criminal offence against, or related to, a vulnerable person
- behaved in a way that indicated they are unsuitable to work with young people.

Clear and comprehensive records of all allegations made against adults working or volunteering with children must be kept, including:

- what the allegations were
- how the allegations were followed up
- how things were resolved
- any action taken
- decisions reached about the person's suitability to continue to work with children

*Any allegation or concern that an employee or volunteer has behaved in a way that has harmed, or may have harmed a vulnerable person will be taken seriously and dealt with sensitively and promptly, regardless of where the alleged incident took place.*

Depending on the situation, an appropriate response may involve:

- The police investigating and possible criminal offence
- The local child protection services making enquiries and/or assessing whether a child is in need of support
- Internal disciplinary procedures being instigated

### **Allegations against other Adults Using the Centre**

We will prioritise the health and wellbeing of vulnerable people over and above other customers at all times. If abuse is alleged or suspected the Centre will act to protect the vulnerable person in the first instance.

### **Allegations against a Child**

There are many ways that a child may be abusive towards others. A child who is displaying abusive behaviour may not realise they are doing so.

When a child abuses another child, it is sometimes called 'peer on peer abuse' or 'peer abuse' (Department for Education, 2020; Department of Health, 2017).

Allegations may involve:

- [bullying or cyberbullying](#)
- [emotional abuse](#)
- [online abuse](#)
- [physical abuse](#)
- [sexting](#)
- [harmful sexual behaviour](#)
- [sexual abuse](#).

There are a range of ways concerns might be raised.

- A child or adult might make a direct allegation of abuse by a child or young person.
- A child or adult might tell you they're uncomfortable with a child or young person's behaviour. They may not realise the behaviour is abusive.
- A member of staff or volunteer might observe behaviour that gives cause for concern and make a report following your organisation's safeguarding procedures.
- Your organisation may be informed that a child or young person is the subject of an investigation.
- A child or young person might tell you they have harmed someone else or are at risk of doing so.

*When responding to an allegation of abuse made against a child, it's important to consider the needs of everyone involved.*

## Talking to a child who tells you they have behaved abusively

Sometimes a child may tell you directly that they have behaved abusively towards someone else. If this happens:

- reassure the child that they've done the right thing by telling you about it
- listen carefully to the child and let them tell their whole story. Don't try to investigate or quiz the child, but make sure you understand what they're saying
- use non-judgmental language
- remember that a child who is telling you they've abused someone else is a child in need of support
- tell them that you now have to do what you can to keep them and the other children involved safe
- explain what you are going to do next and that you will need to speak to other people who can help
- reassure the child that they can get help to change their behaviour and move forward with their life
- you may want to suggest the child contacts [Childline](#) for support.

*Never promise to keep what a child tells you a secret. Explain that you need to talk to other people who can help keep them and the other children involved safe.*

## Talking to a child who may be behaving abusively

If allegations have been made against a child you should speak to your nominated child protection lead, who can advise you on the best way to proceed. If you confront the child about the allegations before taking advice, it may make the situation worse.

Sometimes you may have noticed a child behaving inappropriately and you may need to talk to them about this immediately, in order to manage the behaviour. Remember that they may not realise their behaviour is unacceptable. Talk to them calmly and explain why their behaviour is unsuitable and what they can do to improve it.

It's helpful to have a code of conduct which everyone in your organisations agrees to, and which you can refer to when managing behaviour.

Be aware that a child who displays challenging behaviour may be doing so because they have experienced abuse or neglect. If you think this may be the case, follow your organisation's child protection procedures.

## Making notes

It's important to keep accurate and detailed notes on any concerns you have about a child. You will need to share this record with your nominated child protection lead. Include:

- the child's details (name, age, address)
- what the child said or did that gave you cause for concern (if the child made a verbal disclosure, write down their exact words)
- the details of any other children involved or impacted.

## Deciding if a concern is a child protection issue

When a child or young person behaves inappropriately towards another child, a decision needs to be made about whether there may be a child protection concern.

Your organisation's nominated child protection lead should make this decision in consultation with:

- the volunteer or staff member who is responsible for the supervision/pastoral care of the children involved
- the senior manager or trustee responsible for safeguarding
- any other agencies you know are working with the child

- the local child protection services if necessary.

### **When an allegation is a child protection concern**

An allegation becomes a child protection concern when:

- the behaviour involves sexual assault or physical assault
- the child who has experienced the abusive behaviour has suffered significant harm
- the behaviour forms part of a pattern of concerning behaviour by the child or young person who is being abusive
- the child carrying out the abuse is displaying harmful sexual behaviour
- you are concerned that the child carrying out the abuse may be doing so because they have experienced abuse or other upsetting experiences themselves.

It is also a child protection concern when there's a significant difference of power between the child who is displaying abusive behaviour and the person being abused, for example when:

- there's an age difference of more than two years
- there's a significant difference in terms of size or level of ability
- the child displaying abusive behaviour holds a position of power (such as being a helper, volunteer or informal leader)
- the child being abused is significantly more vulnerable than the other child or young person.

### **When you're not sure**

If you aren't sure whether a child or young person's behaviour is abusive, you could contact the NSPCC Helpline on 0808 800 5000 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Trained professionals will talk through any concerns, provide expert advice and take action to protect the child as appropriate. This may include making a referral to the local authority.

### **Telling parents that their child may have abused someone else**

The child's parents or carers should be told what has happened, as long as it doesn't increase the risk to the child.

Ask the child how they would like their parents/carers to be told. You could suggest:

- talking to parents first without the child there, then summarising everything with the child present
- helping the child tell their parents in their own words, with you present for support.

It's important for parents and children to talk about what's happened and begin to come to terms with it as a family.

When talking to parents or carers, remember that the news their child has behaved abusively may be a shock. Reassure them that support is available to help their child change their behaviour and move forward.

### **Support for parents**

You should also make sure that the parents/carers are offered appropriate support. Some organisations that may be helpful for parents/carers include:

- [Family Lives](#) which helps parents/carers to deal with a range of challenges
- [The Lucy Faithfull Foundation](#) which provides support around child sexual abuse/harmful sexual behaviour.

### **Sanctions**

Your organisation should have a behaviour code which explains how you expect people to behave. It should set out what sanctions will apply to anybody who chooses not to behave appropriately.

You should follow these sanctions for any child who does not behave in the right way.

## Historic Abuse

Non-Recent or Historic Abuse claims refer to any claim that relates to an incident that took place in the past. These disclosures are commonly associated with sexual abuse claims but are not limited to these and can also include physical or emotional abuse, or neglect by someone who is now 18 years or over, relating to an incident that took place when the alleged victim was under 18 years old.

Allegations can be:

- An adult making an allegation of abuse when they were under 18 years of age, that occurred at least one year before it was reported
- A child making an allegation of abuse that occurred at least one year before it was reported
- An individual who reports an allegation, on behalf of another child or adult, that occurred at least one year before it was reported

Children who have been abused or neglected may experience physical or emotional harm. The effects can be short term but sometimes they last into adulthood. If someone has been abused as a child, it is more likely that they will suffer abuse again.

The non-recent abuse procedure must be followed in the following circumstances:

- Allegations of child abuse involving people in positions of influence due to being in the public eye or people in a position of trust
- Allegations of child abuse offences that took place historically where there may have been a failure within an organisation to protect children
- Allegations of child abuse involving people who are likely to be active where other children may be at risk of harm

An allegation of this nature can be received by any individual working in the organisation and could be made against, relatives, friends, carers, people in the public eye or a position of trust, or any other person who currently has, or has previously had, contact with young people.

Disclosures normally, but don't always, take place when the victim is no longer in circumstances where they consider themselves at risk from the perpetrator.

Reporting can be delayed due to:

- Fear of reprisals
- The degree of control exercised by the abuser
- Shame or fear that the allegation may not be believed
- Lack of confidence before becoming aware that the abuser is being investigated for a similar matter
- Feelings of needing closure in order to move on

Action must be taken in these instances because:

- The alleged abuse may not have been an isolated incident; it might be ongoing and being perpetrated by the same person or someone else
- It may come to light that the non-recent abuse is part of a wider setting of institutional or organised abuse
- There is a probable likelihood that the person who abused the child in the past may still be doing so

- The perpetrator may still be working with or caring for children
- Criminal prosecutions may still be taking place despite the fact that the allegations are historic in nature and in some instances may have taken place many years ago

All allegations of historic abuse should be reported to the statutory authorities. In some circumstances, a referral may have already been made to children's social care and further allegations made.

In all cases the new information needs to be shared with those involved and recorded. As with any disclosure it's important to reassure the victims that they will be believed and to inform them of the support available from agencies such as NAPAC.

When receiving information about non-recent historic abuse it is important to obtain the following:

- Name and contact details of the person making the allegations, taking into account if the individual wishes to remain anonymous
- Name of the individual who the allegation is about and any other identifying information, including location
- Name of any children or other victims involved
- Date and time of when the abuse occurred
- Key information about the nature of the non-recent abuse allegation
- Establish, where possible, if the alleged perpetrator is still working with or caring for children
- Establish whether or not other agencies are involved

### **Photography and Sharing Images**

It's important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity.

However, it's also important to be aware of child protection and safeguarding issues when people are taking photos or filming at events. The potential for misuse of images can be reduced if organisations are aware of the potential risks and dangers and put appropriate measures in place.

For detailed information on our Photography and Filming Policies please see the relevant documents.

### **Whistleblowing**

In the event that a member of staff has concerns that the company is behaving in such a way that endangers vulnerable people they are encouraged to bring this to the attention of the Board of Directors. If they feel unable to do this, they should refer to the Whistleblowing Policy as soon as possible.

### 3: Preventing and Responding to Bullying

This section ensures that effective measures are taken to minimise the risk of bullying and to stop it when it occurs.

The harmful impact of bullying on the wellbeing of children and young people can be serious and prolonged, and is a top concern for children, young people, young adults with care and support needs, and their families. As is the case with child protection and the safeguarding of young adults, we all have a part to play in dealing with it.

There is no legal definition of bullying but it is usually behaviour that is:

- Repeated
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, eg because of race, religion, gender or sexual orientation (disability could also be usefully added to this list)

These definitions and descriptions are equally applicable to the over 18 age group.

Bullying can occur in any group of children or young people, and sometimes between adults. It can take many forms and, as we have seen, is often perpetrated remotely by, for example, using mobile devices, email, instant messenger or social networking sites, when it is known as cyberbullying

Cyberbullying means that it is possible to circulate unkind and harmful rumours, messages or images to large numbers of people very quickly. Such material can be extremely difficult to destroy.

Some forms of bullying are illegal and should be reported to the police. These include violence or assault, hate crimes, theft, harassment or intimidation, including threats, abusive phone calls or abusive messages.

Bullying can become serious enough to be a child or adult protection issue and should be dealt with under relevant procedures.

#### **Anti-Bullying Policy**

Given the often serious nature of bullying we feel it is important to have a separate Policy that deals directly with this. As such, please review our Anti-Bullying Policy for full details.

## 4: Running Safe Activities and Events

This section covers the arrangements that are in place to ensure that the physical risks associated with the activities undertaken by the children, young people and young adults in the organisation are identified and managed.

In our industry we must recognise the severe risks that exist, however we should also temper this with the knowledge that risk is an inherent part of life and so learning to deal with risk is extremely important. Leading specialists in play provision, physical activity and injury prevention, and even the Health and Safety Executive all favour a “risk-benefit” approach. When working with children, we should recognise that, as they get older, they need and want to take risks when they play. Children cannot grow and thrive without learning to cope with the possibility that things can sometimes go wrong.

### Guiding Principles of Risk Management for Children

In developing our Safeguarding and Risk Assessment Policies we have used the following guiding principles;

1. Distinguish between serious risks to children’s health (such as head injuries, spinal injuries, burns and scalds) and more minor injuries that are simply part of active children growing up (such as grazed knees and bruises). Energy should be focused on preventing serious accidents, such as those that lead to hospital admission.
2. Accidents are closely linked to children’s ages and stages of development, as a result activities should be adjusted accordingly.
3. Think about which accidents are most likely to cause serious injury to children, young people and young adults. Model safe behaviour that young people, young adults and families can maintain on an everyday basis.
4. Take account of the fact that children’s understanding of risk and consequences develops over time. While helping children to develop skills to recognise and manage risks, you need to protect them from serious harm they may not yet understand.
5. Weigh up the risks and benefits of activities and, where there are clear benefits, consider options that will recognise both.
6. When working with young adults with care and support needs, it is important to understand whether and how their needs impact on their capacity to assess risk and live independently, and then to use this knowledge in such a way as to maximise their choices and independence.

### Risk Evaluation and Management

In order to ensure that we are effectively identifying areas of risk and taking steps to mitigate those risks we have an Accident Prevention Policy in Place. As a part of this Policy we carry out a Risk-Benefit Analysis of our activities and facilities in order to ensure that activities are appropriate for our user groups.

### Equipment Safety Checks

All of our facilities and equipment are subject to regular, documented safety checks which are carried out by appropriately competent people.

### Information and Consent

It is of the utmost importance to us that we obtain properly informed consent from the parents/guardians/carers of our young users. As a result we operate a rigorous consent system that ensures that parents have a full understanding of what their child will be doing at our Centre.

All consent forms and registers include areas for emergency contact details and medical information to be recorded.

### **In Case of an Incident**

Our Centres always have qualified First Aiders on site. It is our intention that every single member of staff is qualified.

Our first aid supplies are regularly checked and replenished in order to ensure that they are ready for use.

We keep extremely concise records of accidents and near-misses in order that we can continually learn and improve our systems

We keep a "Quick Access" list of contacts for local Health, Social Care, Police and Emergency Services.

### **Supervision**

We operate strict Supervision Policies in the Centre. In brief; unless a "Sign-Off" has been completed all U18s must be supervised by a competent adult climber. For full details of these policies please see the relevant section of the Normal Operating Procedures.

## 5:Recording and Storing Information

This section ensures arrangements are in place to ensure that personal or sensitive information about children, young people, young adults and families is recorded appropriately and stored securely.

Keeping records about the children, young people, young adults and families with whom we work is important for several reasons:

- An attendance register, essential information about members' care needs and contact details of parents and carers are, as we have seen in Standard 4, vital in keeping children and young people/young adults safe and promoting their welfare.
- Clear and accurate records are an absolute necessity if we are ever in the position of having to make a referral to a child protection or adult safeguarding agency because we believe that someone may be at risk of abuse or in need

We have a detailed and clear Privacy Policy which details how we capture, handle and store personal data however, for ease, we have included some of our guiding principles here:

- Personal data shall be obtained only for one or more specified and lawful purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

### What we record

For each time a Child visits our centre we have a registration and check-in process which is dependant on the method of supervision;

For all concerns we record:

- the concern
- how it was responded to
- where it was reported to
- and what the outcome of this report was

### Access to Records

Under our GDPR obligations and in line with our Privacy Policy any individual may request to review any and all records we hold about them. For complete information on this process please refer to our Privacy Policy Documents.

Given that young people have a right to see their records it is important that staff use appropriate language when writing records paying particular attention to the person's age, level of development, their physical, mental and emotional health, their support networks, and their capacity to read and understand the material to which they are being given access.

Where records refer to disclosures from young people it is important that the reader is able to hear the voice of the child or adult clearly – they should not just be about the worker giving information or offering their

opinion. If there is a difference of view between the person writing the record and the person who is the subject of the record, this should be reflected. The record should be person-centred and focused on the needs and wishes of the child, young person/young adult who is involved.

Where a parent has made a request to view records of a young person we will discuss this with the young person first in order that they are fully aware of what their parents will see and can have an opportunity to voice an objection if they want to.

### **Secure Storage of Records**

Under our GDPR obligations and in line with our Privacy Policy all personal data is stored securely. For complete information on this please refer to our Privacy Policy Documents.

Information about child protection concerns and referrals should be kept in a separate file for each child rather than in a single "Log". The file should be started as soon as you become aware of any concerns. It is good practice to keep child protection files separate from a child's general records. You should mark the general record to indicate that there is a separate child protection file.

### **Retention of Records**

Some agencies, for example in the education and health sectors, have their own guidance for the retention of child protection information.

The guidance for schools on record keeping and management of child protection information states that: child protection files should be passed on to any new school the child attends and kept until they are 25 (this is seven years after they reach the school leaving age) (Information and Records Management Society (IRMS), 2016).

In some cases, records can be kept for longer periods - See the Exceptions section below for more information.

Records relating to concerns about an adult's behaviour should be kept in a confidential personal file and not as part of a "Log" and a copy should be provided to the individual.

If concerns have been raised about an adult's behaviour around children you should keep the records in their personnel file either until they reach the age of 65 or for 10 years whichever is longer (IRMS, 2016).

This applies to volunteers and paid staff.

For example: if someone is 60 when the investigation into the allegation is concluded, keep the records until their 70th birthday, if someone is 30 when the investigation into the allegation is concluded, keep the records until they are aged 65.

You should keep records for the same amount of time regardless of whether the allegations were unfounded. However, if you find that allegations are malicious you should destroy the record immediately.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

In some cases, records can be kept for longer periods of time. For example, if:

- the records provide information about a child's personal history which they might want to access at a later date
- the records have been maintained for the purposes of research
- the information in the records is relevant to legal action that has been started but not finished

- the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

### **Disposal of Records**

Under our GDPR obligations and in line with our Privacy Policy all personal data is destroyed after set timeframes. For complete information on this please refer to our Privacy Policy Documents.

When the retention period is finished, confidential records are incinerated or shredded in the presence of the DSO and the Information Security Officer of the organisation. At the same time any electronic versions of the record must be purged.

If not shredded immediately, all confidential records must be held in a secured plastic bag, labelled as confidential and locked in a cupboard or other secure place; or placed in a confidential waste bin.

## 6: Working With Others

This section covers the policies and practices that support effective information sharing and working with other agencies to ensure we are achieving appropriate levels of safeguarding.

*"fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children."*

Our communication guidelines are taken from the Caldicott Review 2013 and are as follows;

- information will only be shared on a 'need to know' basis when it is in the interests of the adult
- confidentiality must not be confused with secrecy
- informed consent should be obtained but, if this is not possible and other vulnerable people are at risk of abuse or neglect, it may be necessary to override the requirement
- it is inappropriate for agencies to give assurances of absolute confidentiality in cases where there are concerns about abuse, particularly in those situations when other adults may be at risk

### Sharing Information with Other professionals and Agencies

To keep these children safe, information needs to be shared appropriately so that decisions can be made to protect them.

Whenever we receive information that raises concerns about a child or children, decisions need to be made about information sharing.

#### Who to share information with

Part of the decision-making process will include consideration about who to share information with. This could include:

- Statutory organisations – the Police and/or Children's Services must be informed about child protection concerns; Designated Officers should be consulted where there are concerns about someone in a position of trust.
- Disclosure & Barring Service – must be informed of any concerns about someone in regulated activity who is suspended or expelled from the organisation.
- Other clubs and other sports organisations – informing other organisations need to be considered according to the principles below in order that they can safeguard children in their care who may be at risk of harm.
- Individuals within the organisation – this will be decided on the basis of who needs to know what information in order to keep children safe according to the principles below.

#### When to share information

Timely information sharing is key to safeguarding and promoting the welfare of children.

People who work with children, whether in a paid or voluntary role, may need to share information about the children and families they are involved with for a number of reasons. These include:

- you are making a referral to arrange additional support for someone in the family
- someone from another agency has asked for information about a child or family
- someone in the family has asked to be referred for further help
- a statutory duty or court order requires information to be shared
- you are concerned that a child or a member of their family may be at risk of significant harm

- you think a serious crime may have been committed or is about to be committed which involves someone in the family.

*You must always have a clear and legitimate purpose for sharing a child's personal information. Keep a record of the reasons why you are sharing or requesting information about a child or their family.*

*You should also make sure you are not putting a child's safety and welfare at risk by sharing information about them.*

Always seek consent to share information about a child and their family. However if consent isn't given, you can still share information with relevant professionals under certain circumstances, for example if you are protecting a child from significant harm.

### **What information to share**

You need to decide what specific information is appropriate to share and who to share it with.

- Prioritise the safety and welfare of the child and anyone else who may be affected by the situation.
- Make sure you share the information quickly and securely. The sooner you report your concerns the better. This means the details will be fresh in your mind and action can be taken quickly.
- Identify how much information should be shared. This will depend on the reasons for sharing it.
- Use language that is clear and precise. Different agencies may use and understand terminology differently.
- Make sure the information you are sharing is accurate. Make it clear what information is factual and what is based on opinion (yours or other people's).

### **Facts and opinions**

When working with children and families you will gather information from a variety of sources. How you interpret this information can depend on:

- any previous information received
- your knowledge of research and theory
- your own frame of reference.

When recording information you should be as factual as possible. If you need to give your own or somebody else's opinion make sure it is clearly differentiated from fact. You should identify whose opinion is being given and record their exact words.

### **Seeking consent to share information**

Children should be given the opportunity to decide whether they agree to their personal information being shared. If a child doesn't have the capacity to make their own decisions, ask their parent or carer (unless doing so would put the child at risk of harm).

The Gillick competency and Fraser guidelines help professionals to assess whether a child is mature enough to make decisions.

[> See guidance on the Gillick competency and Fraser guidelines](#)

*You should always seek consent to share information about an adult.*

### **Tips for getting consent:**

- be open and honest
- make sure the person you're asking for consent understands what information will be shared and why
- explain who will see the information and what it will be used for

- make sure the person you're asking for consent understands the consequences of their information not being shared
- get the consent in writing, in case there are any disputes in the future. If it's only given verbally, make a written record of this
- make sure the person knows they can withdraw consent at any time.

### **Sharing information without consent**

If consent is refused or if you're unable to seek consent, you can still share information with relevant professionals if this is in the public interest.

This includes protecting children from significant harm and promoting the welfare of children.

When deciding whether to share information without consent, you should consider each case individually.

- Decide if the need to share information is in the public interest and whether it outweighs the need to maintain confidentiality.
- Consider all the implications of sharing the information, for example if you are sharing sensitive details about a person's life.

If you're not sure what to do, [contact the NSPCC helpline for advice](#).

Make sure you are following the relevant legislation and guidance.

If you're sharing information without consent keep a written record explaining:

- what steps you took to get consent
- the person's reasons for not giving consent (if known)
- why you felt it was necessary to share information without consent.

Pass a copy of this record on to the agency/agencies you're sharing the information with.

### **Confidentiality**

*Never promise a child that you will keep the things they're telling you a secret. Explain that you need to share what they've told you with someone who will be able to help.*

If a child or young person needs confidential help and advice direct them to Childline. Calls to 0800 1111 are free and children can also [contact Childline online](#).

## Important Contacts

Children's Social Care Team - Poole Council - 01202 735046 - 01202 657279 (Out of Hours)

Designated Safeguarding Officer - Richard Smith

Deputy Safeguarding Officer - Kirsten Bergant

Board Member with Special Responsibility for Safeguarding - Freddie Naish

Local Council for Voluntary Service (CVS)

Local Safeguarding Children Board (LSCB) - <https://bournemouth-poole-lscb.org.uk/>

Safeguarding Adults Board (SAB)

NSPCC Helpline 0808 800 5000

Childline 0800 1111

NAPAC Support line 0808 801 0331

## Legislative Documents and Guidance

This section sets out the legislation and guidance documents that have been referenced in creating this Policy.

[Working Together to Safeguard Children 2018](#)

Children and Families Act 2014

The Care Act 2014

[The Care Act 2014 Care and Support Statutory Guidance \(specifically the safeguarding section of this\)](#)

The Mental Capacity Act 2005

The Human Rights Act 1998

The Data Protection Act 1998

[NSPCC Safeguarding and Child Protection Standards for the Voluntary and Community Sector](#)

## Additional Resources and Reference Materials

Below you will find links to additional websites, resources, and reference materials that you may find of use should you wish to further your knowledge of Safeguarding

Ofsted 'Safeguarding Children' at [www.gov.uk](http://www.gov.uk)

The Charity Commission 'Protecting vulnerable groups' at [www.gov.uk](http://www.gov.uk)

Association of Directors of Children's Services (ADCS) 'Safeguarding' at <http://adcs.org.uk>

Care Quality Commission 'Safeguarding people' at [www.cqc.org.uk](http://www.cqc.org.uk)

Social Care Institute for Excellence [www.scie.org.uk](http://www.scie.org.uk)