

**Policy Ref:
GOV-18b**



Safeguarding and protecting adults

Date Approved	October 2025
Approved By	Board
Review Date	October 2026



SASP are committed to our Diversity and Inclusion Action Plan (DIAP) which sets out our ambitions for advancing and celebrating diversity and inclusion at every level of our organisation.

This stamp indicates areas in our policies / procedures that focus on Equality, Diversity & Inclusion.

Policy Update Record (Version Control)		
Date	Author	Change(s)
03/09/2025	Laura Carter	Updated to include LLC section
04/09/2025	Rachel Martin	Policy reformatted to SASP standard.
21/10/2025	FGAR	Policy approval at FGAR meeting

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FORWARD

Participation in physical activity and sport can make an important and memorable contribution to the lives and future development of all.

As well as the positive health benefits of an active lifestyle, physical activity and sport provides children, young people and adults with the opportunity to learn new skills, build confidence, resilience, and self-esteem.

Above all it gives everyone involved the opportunity to fulfil or maximise their own unique potential.

Everyone working with children, young people and adults is first and foremost in a position of trust, influence, and responsibility.

It is important that people aspire to the highest standards and values we can offer and encourage, through enjoyable experiences in positive and safe physical activity and sport environments.

Those of us who by virtue of our position as a volunteer or a professional should be prepared commit to always act in their best interest - and to this end we are more than happy to affirm the commitment of the Board of Directors and to endorse both this Policy and the Implementation Plan which goes with it.

Jane Knowles SASP
Chief Executive Officer

Joanna Whitehead
SASP Board Member

Laura Carter
SASP Safeguarding Lead

****IF YOU HAVE AN IMMEDIATE SAFEGUARDING CONCERN****

Please contact:

SASP Safeguarding Lead: Laura Carter - 01823 653990 / lcarter@sasp.co.uk

SASP Deputy Safeguarding Lead: Jane Clark - 01823 653990 / jclark@sasp.co.uk

If a child, young person, or adult at risk is in immediate danger, contact the police on 999. Other useful numbers include:

NSPCC Helpline – 0808 800 5000

Somerset Social Care – 0300 123 2224

NSPCC Childline – 0800 1111

INTRODUCTION

SASP (the Partnership) is committed to providing safe, enjoyable activities and sporting opportunities for children, young people and adults.

We have a moral and a legal obligation to ensure the highest possible standard of care for those who use our service.

We believe that children, young people and adults have the right to be safe, secure, and free from threat and that everyone has the right to be treated with respect and to have their concerns listened to and acted upon.

To this end, the following Policy Document, along with the Implementation Plan, will provide guidance and help raise awareness for all staff working for and with SASP, whether paid or unpaid.

This policy will be reviewed every two years or earlier considering changes in regulations, significant incidents, or if requested to do so by relevant partner organisations.

The purpose of the policy is to safeguard adults in physical activity and sport and to facilitate the best possible practice from SASP's staff and volunteers.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

As part of our safeguarding policy, we will:

- Promote and prioritise the safety and wellbeing of adults.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to adults.
- Ensure appropriate action is taken in the event of incidents / concerns of abuse, and support provided to the individual/s who raise or disclose the concern.
- Ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored.
- Prevent the employment / deployment of unsuitable individuals.
- Ensure robust safeguarding arrangements and procedures are in operation.
- Educate and support those organisations delivering activities with SASP or within their own environments.

National Governing Bodies have their own Safeguarding Guidelines. Their guidelines will complement this SASP Policy but in any area of doubt, the SASP Policy will overrule.

DEFINITIONS

Adult at Risk

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

- Has needs for care and support (whether the local authority is meeting any of those needs) and;
- Is experiencing, or is at risk of, abuse or neglect; and;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Legislation – What is adult safeguarding?

"Adult safeguarding" is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities.

The Care Act 2014

The practices and procedures within this policy are based on the principles contained within the UK legislation and Government Guidance and take the following into consideration:

- UK General Data Protection Regulation (2021)
- 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
- Freedom of Information Act 2000
- The Human Rights Act 1998

Parent

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

Poor Practice

Poor practice includes any behaviour that contravenes SASPs Conduct Standards.

Capacity

While it is not for individuals to decide about whether an adult lacks capacity, it is important that you understand the notion of capacity when safeguarding adults at risk.

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

SCOPE

SASP recognises that it is not appropriate to use a combined policy regarding the safeguarding of children and young people, and adults, due to the difference in legal and statutory requirements. Therefore, the information in this document only applies to SASP's work with adults and relates to all staff and volunteers employed or deployed by SASP for the programmes over which it has supervision and control.

At SASP, we believe that when people feel respected and included, they can be more engaged, satisfied and motivated. We are committed to building a diverse and inclusive organisation that represents and celebrates the different perspectives of our staff, our board, our partners and the communities we serve.

The principles outlined in our policy will inform (and vice versa) other relevant policies and procedures such as the Diversity and Inclusion Action Plan (DIAP).

IMPLEMENTATION

SASP has two main areas of responsibility regarding safeguarding adults, and depending on the situation/programme concerned, different levels of responsibility may occur.

These are:

- **Operational** – this is in relation to SASP employment staff and SASP run projects where SASP are directly responsible for the safety of adults in our care.
- **Strategic** – involves work with partners where SASP cannot take overall responsibility but has a commitment to safeguarding and plays a pivotal role in advising and supporting its partners.

1.0 OUR COMMITMENT

We will endeavour to:

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

1.1 Policy Aims

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

The aims are:

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

1.2 Objectives

The objectives are:

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

1.3 Communication

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

2.0 RECRUITMENT, EMPLOYMENT AND DEPLOYMENT OF STAFF AND VOLUNTEERS

2.1 Recruitment and Selection of Staff / Volunteers

All successful applicants for posts and all current casual staff in regulated activity (either paid or unpaid) involving direct contact with adults will be subject to a DBS check, level of check relevant to role, to ensure that there is no cause for concern. If anything is flagged during a DBS check SASP will follow employment law.

2.2 Induction and Training

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

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

3.0 PROMOTING GOOD PRACTICE

3.1 Duty of Care

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

This duty occurs in two ways:

A **Legal** Duty of Care
 A **Moral** Duty of Care

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

The Moral Duty of Care is more correctly a responsibility for safety and welfare. Members of staff have a responsibility for those adults at risk, and other staff, who are under their control.

3.2 All staff and volunteers working for the Partnership must sign and abide by the Conduct Standards

The Conduct Standards detail the behaviours expected of staff and volunteers. Staff must:

- Treat everyone with respect and dignity.
- Not discriminate.
- Challenge and oppose unacceptable or discriminatory behaviour.
- Maintain satisfactory standards of performance at work.
- Comply with all reasonable management instructions.
- Co-operate fully with your colleagues and with management.
- Ensure the maintenance of acceptable standards of politeness, and do not create an intimidating, hostile, degrading, humiliating or offensive environment.
- Take all necessary steps to safeguard SASP's public image and preserve positive relationships with all persons and organisations connected to SASP.
- Comply with all SASP Policies and Procedures.
- Comply with U.K. law. If SASP become aware of an offence having been committed, SASP may report their concerns to the appropriate authority.
- Ensure that you behave in a way that does not constitute unlawful discrimination, bullying, harassment, or victimisation.
- Managers must not abuse their authority. They must delegate duties to their team members by considering their workload and competencies. Team members must follow team leader instructions and complete their tasks with due care and on time.
- SASP recognises the use of personal mobile phones in the workplace, including to receive verification codes to access SASP IT systems, but they must be used reasonably for personal use, with discretion and without impact on your role or duties.

3.3 Working with Disabled Participants

It is recognised that some adults may be more at risk than others to abuse or harm. They may find it more difficult to recognise and report abuse and to be believed. Staff working with disabled adults will have regular updates on safe / best practice through the Disability Lead and Safeguarding Lead, and further training provided if needed.

3.4 Guidelines for Photography and Filming

SASP is keen to promote positive images of children, young people, and adults at risk participating in physical activity and sport and is not banning the use of photographic or video recording equipment. However, there is evidence that some people have used sporting events as an opportunity to take inappropriate photographs and / or film footage. It is not the intention of SASP to prohibit those with a genuine interest in filming or photography but are committed to ensure that all necessary steps are taken to protect children, young people, and adults at risk from the inappropriate use of their images. Appropriate consent is required to be gained before images are taken and used.

SASP Guidelines:

- Ask the participant / carer permission to use the participant image. This ensures that they are aware of the way the image is to be used (please refer to GDPR Guidelines and be clear about

how and for how long images will be securely stored). For adults the organisation is happy for verbal consent to be obtained. Written consent is not needed unless the staff member feels it is relevant.

- If naming a child, young person, or adult at risk, only use their first names, as this will reduce the risk of inappropriate and unsolicited attention.
- Avoid the inclusion of other detailed information about individuals.
- Only use images of participants in suitable clothing to reduce risk of inappropriate use.
- Images should positively reflect participants' involvement in the activity and promote the best aspects of the activity.

Guidelines for use of photographic filming equipment for official use at sporting events:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Issue the photographer/s with identification which must always be worn.
- Inform participants that a photographer will attend an event and ensure they consent to both the taking and publication of films or photographs which feature them.
- At many events, organisers and others will reasonably wish to take wide angle, more general photos of the event sites, opening and closing ceremonies, and so on. Separate to the issue of consent for 'identifying' photographs/footage of individual participants (as above) participants should at least understand that these types of images will be taken during, or at specific points in the event. It is not reasonable, practical, or proportionate to require consent for taking these general types of images, or to preclude it based on the concerns of a small number of participants.
- Participants should be informed that if they have concerns, they can report these to the organiser.
- Concerns regarding inappropriate or intrusive photography should be reported to the event organiser or official and recorded.
- Other professional photographers/filming/video operators wishing to record the event should seek accreditation with the event organiser by producing their professional identification for the details to be recorded.
- Students or amateur photographers/film/video operators wishing to record the event should seek accreditation with the event organiser outlining their motive for attending the event and planned use of the material.
- SASP to provide a signed photographic consent procedure at each event to include the photographers
 - Name and address of the person using the camera.
 - The reason or use the images are being or intended to be put to.
 - Signed declaration that the information provided is valid and that the images will only be used for the reasons given.

Guidelines for use of photographic filming equipment by parents / guardians / spectators at sporting events:

- If spectators are intending to photograph or video at an event they should also be made aware of SASPs expectations.
- Where appropriate, spectators could be asked to register at an event if they wish to use photographic equipment. It is helpful for the event organisers to provide some indication e.g., a sticker for each registered camera, or badge to be displayed by the spectator to help others recognise those who have registered and respond to those who do not appear to have registered.

- The specific details concerning photographic/video and filming equipment registration should, wherever possible, be published prominently in event programmes, on signage around the site and announced over the public address system, prior to the start of the event.

3.5 Sharing of Information

Wherever possible informed consent to share information should be obtained from the adult at risk, including what information is being shared, with whom and why. However, staff can always share information with the SASP Safeguarding Lead whether there is consent or not from the adult in question, this is to protect the staff member as well as the adult at risk.

If informed consent is withheld, then the Safeguarding Lead will decide as to whether information is to be shared. This could be due to:

- A high risk to serious harm to the adult at risk
- Consent was withheld under duress
- Children or other adults at risk could be harmed

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

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

Assessing Capacity

A person's capacity must be assessed at the point at which the decision is needed, taking into account relevant and immediate circumstances as well as possible long-term issues.

Adults are assumed to be competent to give consent in making decisions, unless otherwise demonstrated by their capacity being affected by such things as: medication, substances and some untreated mental health issues. For adults, this means that they have the capacity to choose how they live and make decisions about their safety, even if we do not agree with certain decisions. If you are unsure or concerned that the person may not have the mental capacity to make an informed choice about their safety or evaluate the risk of abuse with their situation, you can report this to the SASP Safeguarding Lead.

3.6 Use of social media and other digital communication

It is important to note that this is an area that is constantly changing but SASP aim:

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

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

- All social media accounts will be password-protected, and at least 3 members of staff will have access to each account and password
- Adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers
- The accounts will be monitored by a designated person (Communications Lead), who will seek advice from the Safeguarding Lead to advise on safeguarding requirements
- Identifying details such as a home address, school name or telephone number shouldn't be posted on social media platforms
- Participants will be asked to give their approval for SASP to communicate with them through social media, or by any other means of communication
- Participants will be asked to give their permission for photographs or videos to be posted on social media
- All of our accounts and email addresses will be appropriate and fit for purpose

What we expect of staff and volunteers:

- Staff should seek the advice of the Safeguarding or Comms Lead if they have any concerns about the use of the internet or social media
- Staff should make sure any content posted is accurate and appropriate
- Any disclosures of abuse reported through social media should be dealt with in the same way as a face-to-face disclosure, according to our reporting procedures

Using mobile phones or other digital technology to communicate:

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

- Staff to only use work phones for calls, messaging and capturing photos/film that consent has been obtained for
- Messages, call logs etc. should never be deleted.
- If a participant misinterprets communication and tries to engage a staff member in conversation, the member of staff will take the following steps:
 - End the conversation or stop replying
 - Suggest discussing the subject further at the next practice or event
 - If concerned about the adult, provide contact details for the Safeguarding Lead or appropriate agencies

- Smartphone users should respect the private lives of others and not take or distribute pictures of other people if it could invade their privacy
- Staff and participants must not engage in 'sexting' or send pictures to anyone that are obscene, indecent, or menacing
- Emails should be signed off in a professional manner, avoiding the use of emoji's or symbols such as 'kisses' ('X's)
- For group Calls (Zoom, Teams, WhatsApp) it is important that settings are utilised to ensure privacy such as passwords and waiting rooms. Please refer to the privacy information of the specific platforms for more information

4.0 RESPONDING TO DISCLOSURES, SUSPICIONS OR ALLEGATIONS OF ABUSE

The signs and indicators of abuse can be found in Appendix C.

4.1 Responding to a Concern

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

The SASP Safeguarding Lead will take the appropriate action. Where there is an immediate need to protect the adult from danger the police must be advised.

There should always be a commitment to work in partnership the adult in question 'nothing about me, without me' and with parents or carers if relevant, where there are concerns about adults in their care. Therefore, in most situations it would be important to talk to parents or carers to help clarify any initial concerns. However, there are circumstances in which an adult may be placed at greater risk if such concerns were shared (e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately).

Once the incident / allegation has been reported it is the responsibility of the Safeguarding Lead to inform social services if consent has been given. If consent has not been given the SASP Safeguarding Lead will determine whether it is appropriate to share the information.

IT IS YOUR ROLE TO REPORT NOT TO JUDGE.

Responding to a Disclosure

Children or adults at risk who are being abused will only tell people they trust and with whom they feel safe. By listening to them, and taking seriously what they are telling you, you will already be helping to protect them.

Create a safe environment by:

- Staying calm and not rushing into action which may be inappropriate.
- Confirming you know how difficult it must have been to confide in you and that they have done the right thing.
- Reassuring them and stressing they are not to blame.
- Listening to what they say. Show you are taking what is being said seriously.
- Where possible remain in view, do not go somewhere on your own.

Be honest and do not make promises you cannot keep.

Ensure you are quite clear about what they say so you can pass it on to the Safeguarding Lead or adult safeguarding professionals. Use open questions to encourage them to use their own words but do not press for detailed information. NB: The law is very strict, and an abuse case can be dismissed if it appears the victim has been led or words have suggested.

Record exactly what the child or adult has said to you, in a legible and accurate format, as soon as possible after the incident. As far as possible use the adult's own words. Stick to the facts and do not give your opinion. Where possible record:

- the adult's name, address, date of birth
- the nature of the allegations
- a description of any visible bruising or other injuries
- your observations (e.g., a description of their behaviour and physical and emotional state)
- exactly what the adult said and what you said.
- the adult's account of what has happened and how any injuries occurred
- any action you took as a result of your concerns (e.g., who you spoke to and resulting action, including any contact with parents, managers or social services). Include names, addresses and telephone numbers
- sign and date what you have recorded
- store the information in accordance with relevant procedures
- complete the online safeguarding form within 24 hours (this can be found on the Intranet and the staff dashboard)
- all records will be kept securely on Smartsheet with access by the Safeguarding Lead, Deputy Safeguarding Lead, HR Lead and CEO.

Do not take sole responsibility – consult someone else (e.g., your manager or safeguarding lead) as soon as possible so you can begin to protect the individual and gain some support for yourself.

In determining your actions, remember that only experienced and specifically qualified and trained professional should deal with cases or suspicions related to abuse.

If working within GP surgeries, for example Health Coaches, in the first instance staff should notify the practice Safeguarding Lead of their concern as they know the wider care around the adult. A record of concern should also be sent to the SASP Safeguarding Lead for information and in case any professional differences need to be resolved.

Please note that this policy is also supported by HR03 – Public Interest Disclosure (Whistleblowing) Policy and HR19 – Antibullying and Harassment Policy. For more information and the specific reporting procedures for this please refer to the relevant policy.

4.2 Dealing with Allegations against Staff/Volunteers

Please refer to HR11 – Allegations of Abuse Against Staff policy.

5.0 LOWER-LEVEL CONCERNs

Please note that this guidance is included in both the Adult and Children and Young People Safeguarding policies. When the term LADO (Local Authority Designated Lead) is mentioned, this is only relevant to concerns involving children.

5.1 Why we need to respond to lower-level concerns

Having clear procedures for responding to lower-level concerns is part of creating a culture of openness and trust. It helps ensure that adults consistently model the organisational values and helps keep children and adults at risk safe. It can also protect adults working in the organisation from potential false allegations or misunderstandings. Please note that the term 'lower-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation criteria as defined by the Somerset Safeguarding Partnership.

5.2 What is a lower-level concern

A lower-level concern is any concern, no matter how small and even if no more than a 'niggling doubt', that an adult may have acted in a manner inconsistent with the organisational conduct standards (including inappropriate conduct outside of work) or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children and adults at risk.

A lower-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff conduct standards, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the organisation to refer to the local authority.

Lower-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

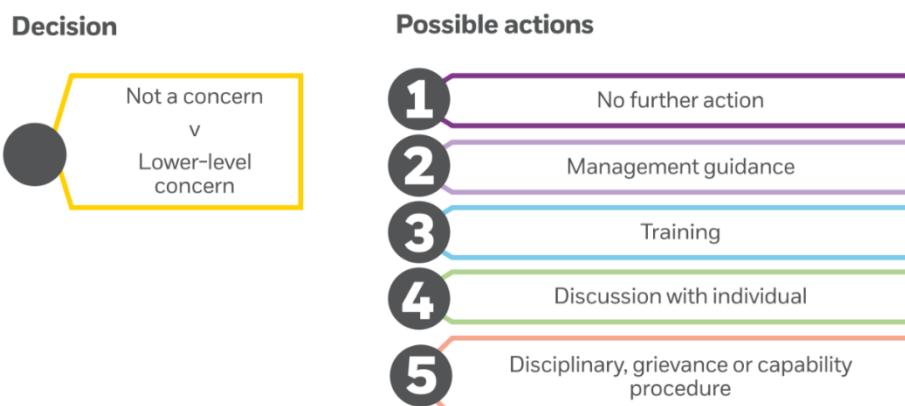
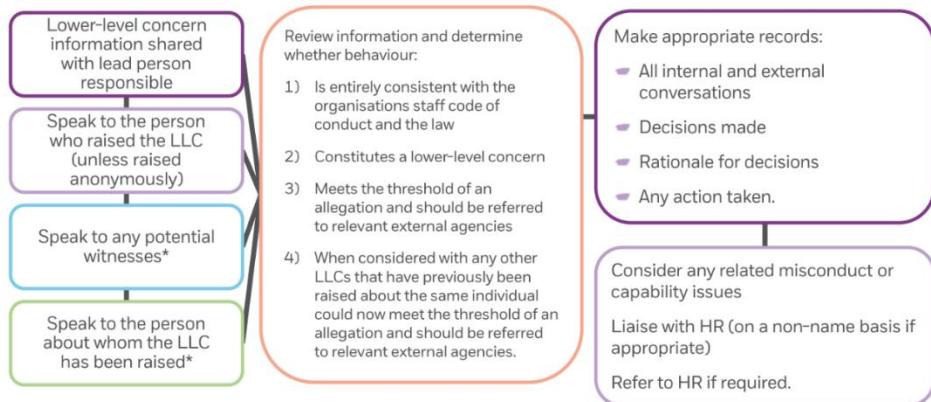
- being over friendly with children
- having favourites
- humiliating children or adults at risk
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

5.3 Reporting a lower-level concern

- Staff are required to report any concerns to the Safeguarding Lead by using the online safeguarding reporting form, a conversation in person or via the phone is also welcome (before the form is completed).
- To encourage reporting, the online form will ask staff whether it is a lower-level concern or safeguarding concern, specific questions will then be asked depending on the answer. Please note that the final determination of whether a concern meets the criteria of an allegation will be made by the Safeguarding Lead and CEO when the matter has been investigated. If there is uncertainty as to whether a lower-level concern meets the harm threshold, the LADO will be consulted for guidance.

5.4 Recording, reviewing and responding to concerns

- Concerns will be recorded on Smartsheet with secure access only available to the Safeguarding Lead, Deputy Safeguarding Lead, HR Manager and CEO.
- Concerns will be responded to in a sensitive and proportionate way, and any investigations will be carried out discretely, and on a need-to-know basis.
- Concerns will be handled promptly and effectively whilst protecting staff against any potential false allegations or misunderstandings.
- The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible.
- Depending on the nature of the concern, either the Safeguarding or HR Lead will collect as much evidence as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.
- All lower-level concerns, including those determined to be unfounded, will be recorded on Smartsheet. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome.
- Records of lower-level concerns are confidential and securely stored in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the organisation.
- All concerns will be reviewed by the lead every quarter to ensure all concerns are dealt with promptly whilst identifying whether there are any problematic patterns of behaviours.
- Lower-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the organisation. However, where a lower-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.



6.0 CONFIDENTIALITY

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

- Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of adults at risk with other professionals, particularly investigatory agencies and adult social services.
- Clear boundaries of confidentiality will be communicated to all.
- All personal information regarding an adult at risk will be kept confidential. All written records will be kept in a secure area for a specific time as identified in the data protection guidelines. Records will only record details required in the initial contact form.
- If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.
- Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the adult at risk is the priority.
- Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.
- Staff must assure the adult that they will keep them informed of any action to be taken and why. The adult's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

7.0 TIMESCALES

- The incident or concern must be recorded and passed to the Manager / Safeguarding Lead within 24 hours. In an ideal situation an online reporting form should be used but where this is not possible an email update will suffice.
- The Lead Safeguarding Officer will determine the appropriate course of action and if appropriate will report the incident to the relevant agency and report outcomes to the Partnership CEO.
- The Safeguarding Lead will retain a copy of all completed incident forms.

8.0 RADICALISATION

Since the 2011 Prevent Review, the UK government defines extremism as: 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces'.

Radicalisation is defined by the UK Government within this context as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups."

Dependant on role, staff will undertake relevant Prevent training, causal staff will undertake this training where relevant. If staff become concerned about a child, young person or adult at risk, they work with or know then they need to report this to the Safeguarding Lead.

Appendix A

Safeguarding Principles

The Care Act sets out the following 6 principles that should underpin safeguarding of adults, including sport and activity organisations.

- 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, 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."

Appendix B

Definition and Types of Abuse

Abuse is a violation of an individual's human and civil rights by another person or persons. 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 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

This encompasses slavery, human trafficking, forced labour and domestic servitude.

Domestic Abuse

This includes psychological, physical, sexual, financial and emotional abuse perpetrated by anyone within a person's family. It also includes so called 'honour' based violence.

Discriminatory

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

This includes 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 because of the structure, policies, processes and practices within an organisation.

Physical

This includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Sexual

This includes 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

This includes 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 13 the misuse or misappropriation of property, possessions or benefits.

Neglect/Acts of omission

This includes ignoring medical or physical care needs, failing 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

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 to safeguarding adults in sport and physical activity:

Cyber Bullying

Cyberbullying 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

This 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 make it a criminal offence to force someone to marry.

Mate Crime

A 'mate crime' is when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them (Safety Network Project, ARC). 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.

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.

Appendix C

Recognising Abuse and Indicators of Abuse

Recognising abuse - Who may be an abuser?

- A family member, parent, child, spouse other relative
- Friend or neighbour
- Paid or volunteer carer
- Visitor
- Professional member of staff, health worker, social carer or other worker
- Visitor of contact
- Another adult at risk

Factors described below are frequently found in cases of abuse and/or neglect. Their presence is not proof abuse has occurred but must be regarded as indicators of possible significant harm. Such indications justify the need for careful assessment and discussion with the designated officer and may require consultation with and/or referral to Local Adult Services. Indications that an adult may be experiencing abuse include the following:

- the adult appears frightened of the parent/s/peers/adults
- the adult acts in a way that is inappropriate to her/his age
- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which the explanation seems inconsistent
- unexplained changes in behaviour
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of adults, particularly those with whom a close relationship would normally be expected
- has difficulty in making friends
- is prevented from socialising with other adults/young people
- displays variations in eating patterns including overeating or loss of appetite
- loses weight for no apparent reason
- becomes increasingly dirty or unkempt

Abuse can also occur through social media, and this is often harder to detect. It is important to remember that the type of abuse that can occur through social media always includes emotional and psychological abuse and can include sexual and financial abuse. Social media includes (but is not limited to): networking sites such as Facebook, Twitter, Instagram and LinkedIn, email, text messages, Skype and instant messaging services.

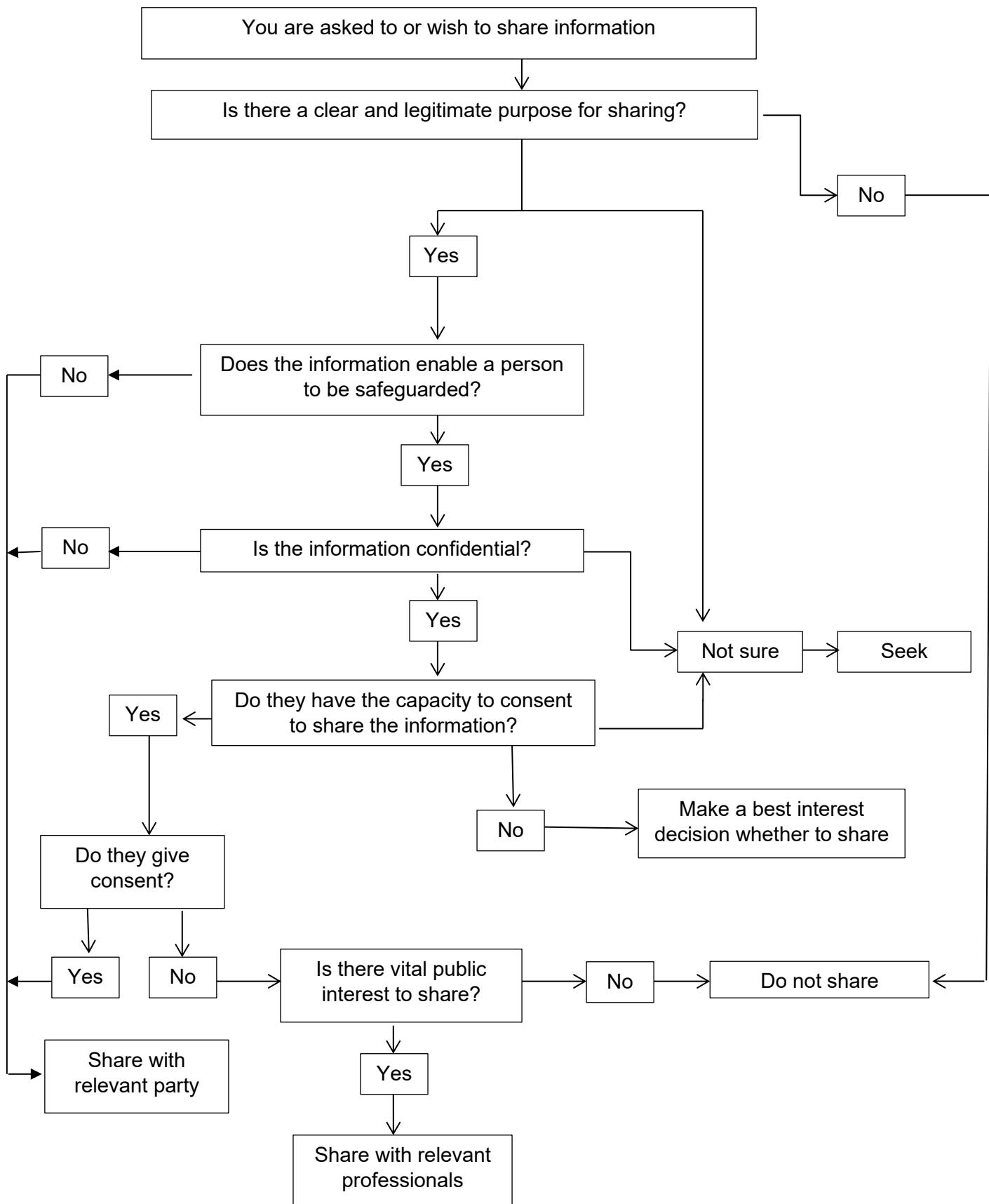
Some examples of abuse that can occur through social media include:

- Unwanted sexual text messages (sexual abuse)
- Unwanted communication or stalking/harassment (emotional abuse)
- Inappropriate messaging: with kisses attached (emotional and sexual abuse)
- Requests for money (financial abuse)
- Intimidation (emotional abuse)
- Sexual coercion (sexual abuse)
- Cyber-bullying (emotional abuse)

It is not the responsibility of those working in sport and physical activity to decide that abuse to an adult is occurring, but it is their responsibility to act on any concerns

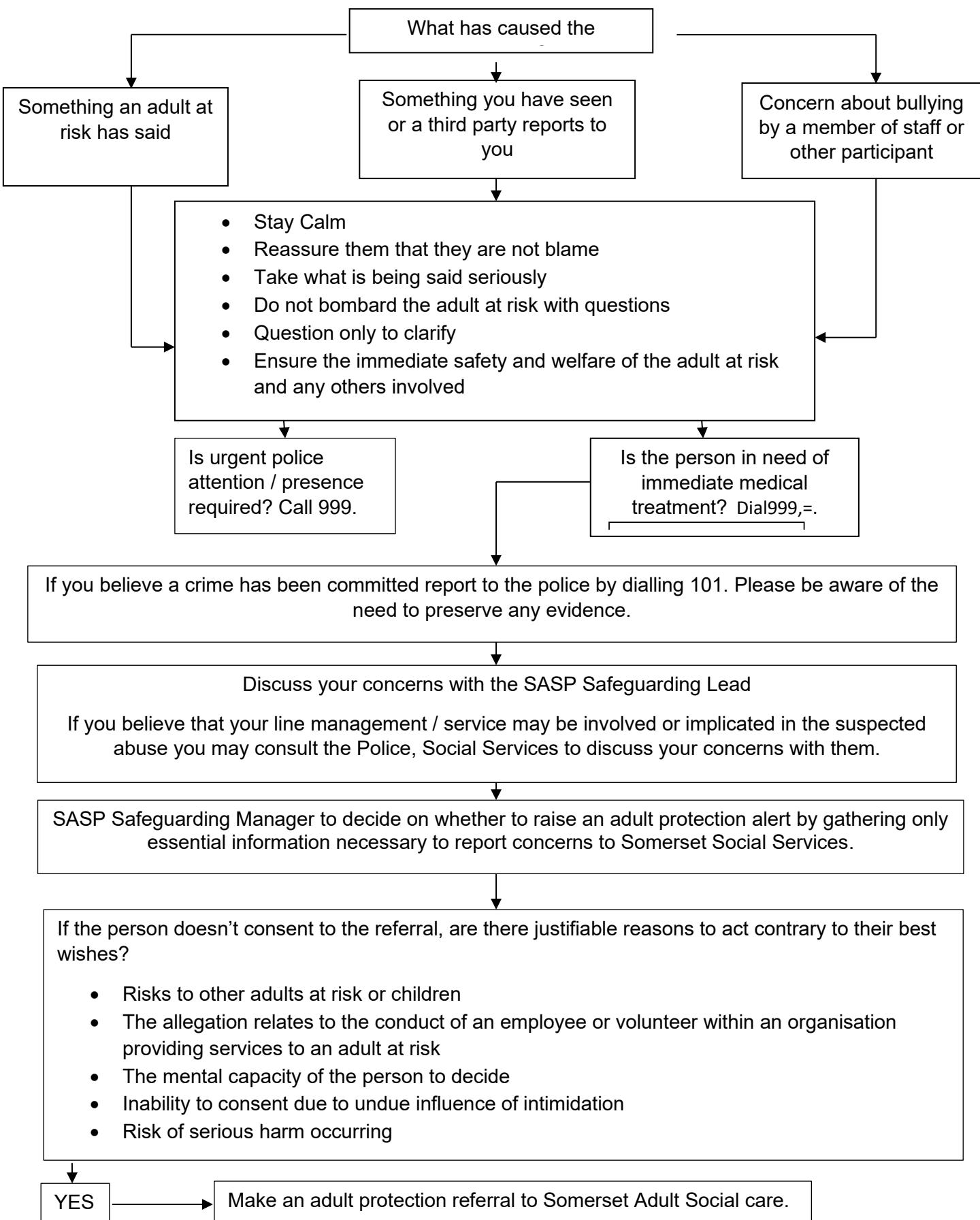
Appendix D

Information Sharing Flowchart



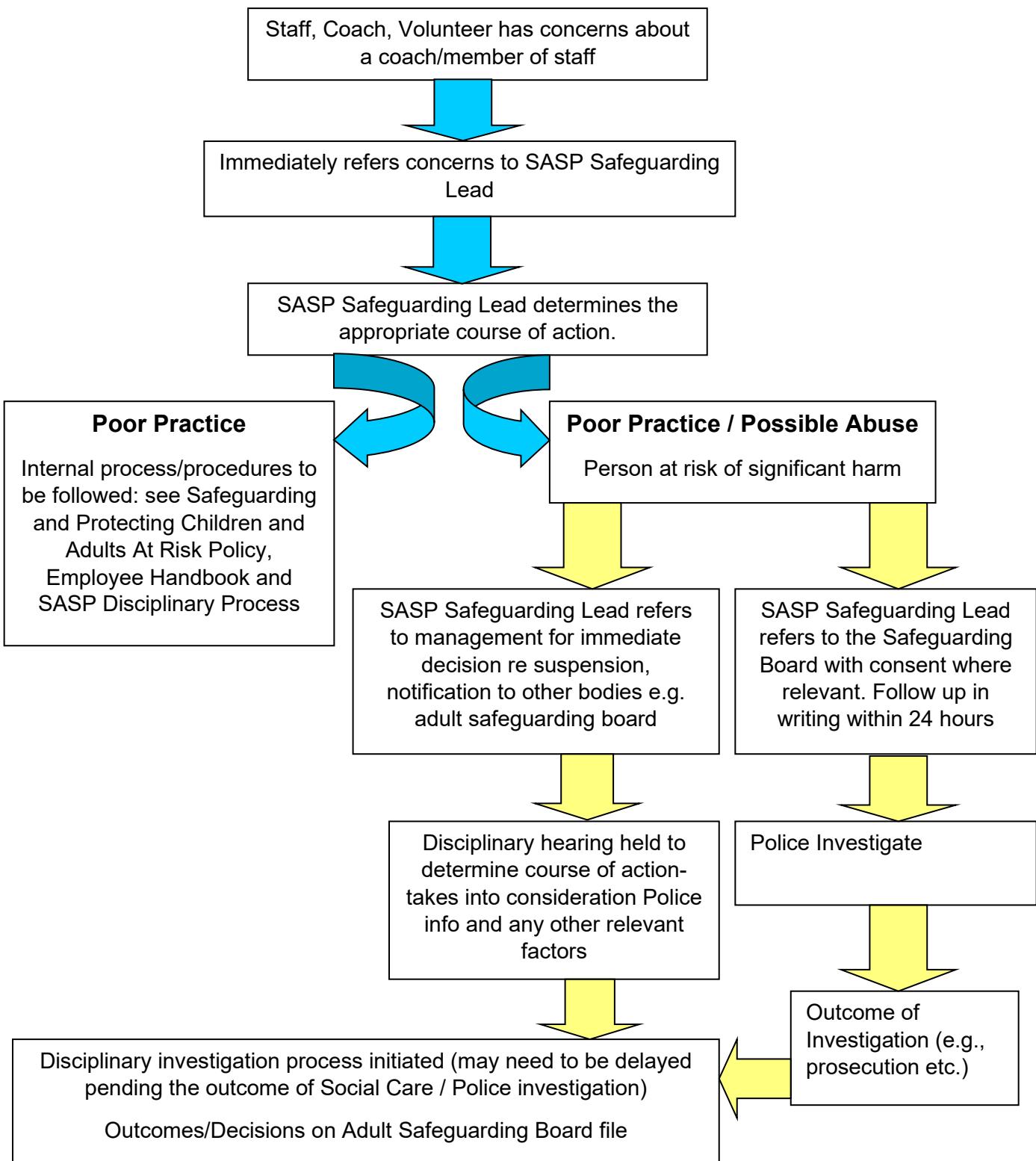
Appendix E

How to respond to a concern



Appendix F

Flow Chart for Reporting Adult Safeguarding Concerns



Appendix G

A Breach of a Position of Trust with an Adult at Risk

Here are some examples of what might constitute a breach of trust (not an exhaustive list):

Abuse or Neglect: Any form of physical, emotional, or financial abuse or neglect that causes harm or distress to the adult at risk.

Exploitation: Taking advantage of the vulnerable adult for personal gain, which could include financial exploitation, manipulation, or coercion.

Failure to Provide Care: Neglecting to provide necessary care or assistance, especially if the person in a position of trust has a duty to do so.

Violation of Confidentiality: Sharing sensitive information about the adult at risk without proper authorization or in a way that could lead to harm.

Conflict of Interest: Engaging in activities or behaviours that create a conflict between the interests of the person in a position of trust and the well-being of the adult at risk.

Failure to Report: Not reporting suspected abuse or neglect when required by law, professional standards, or organizational policies

Appendix H

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

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

