

# **SAFEGUARDING POLICY AND PROCEDURE**



IMS Section:

Human Resources

LD-SG-POL-1



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## **CHANGES FROM LAST ISSUE**

**1.1** Reference made to The Children's Services Co-operation Act (Northern Ireland) 2015, All Wales Child Protection Procedures 2019 and Well-being of Future Generations (Wales) Act 2015

**1.2** In England and Wales Local Safeguarding Children Partnerships (LSCPs) have replaced Local Safeguarding Children Boards (LSCBs)

**1.8** Further information added about safeguarding adults

**2.5** Information regarding GLL's approach to sexual violence and harassment outlined

**2.7** The nine 'protected characteristics' of The Equality Act 2010 listed

**2.10** Reference made to the Mental Capacity Amendment Act (2019), which replaces the Deprivation of Liberty Safeguards with a scheme known as the Liberty Protection Safeguards (LPS) which are due to come into effect in April 2022

**2.11, 2.12 and 2.13** Specific references made to GLL's approach to so called 'low-level' or neutral notification safeguarding concerns, including encouraging staff to self-refer if appropriate. Examples of 'low-level' concerns given

**3.5** Further information added to the information provided on child-on-child abuse, including reference to all the children involved being treated as being at potential risk, including the child allegedly responsible for the abuse

**3.7** Specific reference made to sexual harassment ('unwanted conduct of a sexual nature'), examples listed of both online and offline types of sexual harassment, including 'upskirting'

**8.1** Specific reference made to Female Genital Mutilation (FGM) as a safeguarding issue, like others already explicitly referred to, in the wider context of so-called 'honour-based' violence (HBV)

**8.2** Those children identified by HM Government as those who organisations should be particularly alert to the potential need for early help listed

**8.3 and 9.2** Clarification given with regards to procedures for responding to/raising a concern about a child's or adult's welfare – distinction drawn between information gathering and a 'formal' investigation and guidance given to staff about gathering facts or factual information about an allegation, incident or injury

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**8.3** Clarification given with regards to procedures for responding to/raising a concern about a child's welfare – staff instructed not to discuss any matter further with a child or their parents/carers if this would potentially put the child at further risk of harm

**20.0** Reference made to Keeping Children Safe in Education (September 2021)

Throughout the term peer-on-peer abuse replaced by child-on-child abuse

Throughout minor layout, grammatical and word order changes.

## **SECTION ONE - INTRODUCTION**

### **1.0 PURPOSE AND SCOPE**

**1.1** Under sections 10 and 11 of the Children Act 2004 and chapter 14 of Care and Support Statutory Guidance (Safeguarding), issued under the Care Act 2014, Greenwich Leisure Limited (GLL) are required to cooperate with local authorities to promote the well-being of children and adults at risk in each local authority area.<sup>1</sup> This co-operation should exist and be effective at all levels of the organisation, from strategic level through to operational delivery. Relevant legislation/guidance for Northern Ireland is The Children (Northern Ireland) Order 1995, the Safeguarding Board Act (Northern Ireland) 2011 and The Children's Services Co-operation Act (Northern Ireland) 2015 and for Wales is the All Wales Child Protection Procedures (2019), the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015.

**1.2** Professionals working in agencies with these duties are responsible for ensuring that they fulfil their roles and responsibilities in a manner consistent with the statutory duties of their employer.

**1.3** The purpose of this policy and procedure is to:

- Set out GLL's commitment to safeguarding the children, young people and adults at risk using its services and desire to create a culture of listening to children, young people and adults at risk<sup>2</sup>
- Provide guidance to staff working with children and adults at risk on safe and responsible working practices, in order to protect them from their actions/intentions being misinterpreted

<sup>1</sup> Adults who have care or support needs (whether or not the local authority is meeting any of those needs), are experiencing, or at risk of, abuse or neglect and, as a result of those care or support needs, is unable to protect themselves from abuse or neglect (Care and Support Statutory Guidance, chapter 14).

<sup>2</sup> 'Safeguarding' describes the broader preventative and precautionary approach to planning and procedures that are necessary to protect children, young people and vulnerable adults from any potential harm of damage. Child protection and safer recruitment are important aspects of safeguarding. *Keeping it Safe*, National Council for Voluntary Youth Services, 2002.

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- Outline the procedure for staff to follow if they suspect that a child, young person or adult may be at risk of harm or guide staff how to respond if a disclosure is made to them
- Outline the procedure for staff to follow if they have a concern about a member of the public's behaviour in terms of a child or adult being harmed or their welfare being threatened
- Provide staff and managers with the procedure to use if an allegation is made against/concern raised about a member of staff
- Provide clear whistleblowing procedures, which are suitably referenced in staff training, and help establish a culture that encourages and enables issues about safeguarding and promoting the welfare of children and adults at risk to be addressed
- Outline the measures that GLL will take to ensure that its staff are competent and safe to work with children and adults with care/support needs, including policies on when to obtain a Disclosure and Barring Service (DBS) check and appropriate supervision and support for staff, including the undertaking of safeguarding training
- Set out clearly GLL processes for sharing information (where appropriate following the advice in Information Sharing - Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, July 2018), including in England and Wales with other professionals and with Local Safeguarding Children Partnerships (LSCPs) and Safeguarding Adults Boards (SABs)
- Describe how staff should respond to allegations made by, or concerns raised about an adult at risk – in terms of establishing the facts, ascertaining the adult's views, listening to wishes and gaining consent (where possible) and enabling the adult to be empowered and supported and to achieve resolution and recovery, whilst recognising the first priority should always be to ensure the safety and well-being of the adult
- Describe a clear line of accountability and responsibility for the organisation's safeguarding arrangements, including outlining the role of the National Safeguarding Manager
- Contribute to organisational compliance of sections 10 and 11 of the Children Act 2004 and the requirements laid out in chapter 14 of the Care and Support Statutory Guidance 2014 (or relevant legislation and statutory guidance for Northern Ireland and Wales).

**1.4** This policy and procedure applies to all staff, regardless of whether this is in a paid or unpaid capacity. The term 'staff' will be used in the policy to cover employees, casual workers, agency staff, volunteers and any others working in GLL centres or for GLL.

**1.5** Whilst this policy and procedure is focused on safeguarding children and young people under the age of 18, much of the guidance also has relevance to those working with adults at risk. Whilst, there is cross-over in terms of the broad aims of child and adult safeguarding/protection and the

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core components which make up an appropriate organisational response, there are also important differences between the two.

**1.6** This policy and procedure takes account of relevant legislation and statutory guidance in England, Wales and Northern Ireland.

**1.7** Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

**1.8** Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This process must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances. Adults have different rights and responsibilities to children, including the right to choose to take risks in their lives and make decisions that others may think are not in their best interests.

**1.9** The safeguarding duties apply to an adult who:

- Has care and support needs (whether or not the local authority is meeting any of those needs)
- Is experiencing, or at risk of, abuse or neglect
- 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.

## **2.0 PRINCIPLES**

**2.1** GLL is committed to providing an environment that is safe, supportive and promotes the welfare of children, young people and adults at risk needs as paramount, within a culture that allows them to feel confident about raising concerns about their own and others' safety and wellbeing.

**2.2** Safeguarding and promoting the welfare of children is everyone's responsibility and GLL aim to consider, at all times, what is in the best interests of the child (a child-centred approach). GLL

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recognises that everyone who comes into contact with a child has a role to play in identifying concerns, sharing information and taking prompt action. GLL advises staff to maintain an attitude of 'it could happen here' where safeguarding is concerned.

**2.3** GLL will take all reasonable steps to ensure that staff working with children and adults at risk within the organisation are competent and safe to do so, through following stringent recruitment procedures, providing training and having clear procedures to follow when concerns are raised.

**2.4** GLL will not accept unlawful or unsafe practices from staff in relation to children, young people and adults at risk and will respond to all allegations of abuse or poor practices promptly and effectively. Where necessary, appropriate disciplinary action will be taken.

**2.5** GLL acknowledges the scale of sexual violence and harassment in UK society and understands that not recognising or downplaying some behaviours related to abuse can lead to a culture that normalises abuse, leading to children, young people and adults at risk accepting it as normal and not coming forward to report it. GLL will endeavour to establish a zero-tolerance approach to sexual violence and sexual harassment on in its premises and promote an attitude that it is never acceptable and it will not be tolerated. GLL will never pass off sexual violence and sexual harassment as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. GLL staff will reassure victims that they are being taken seriously and that they will be supported and kept safe and never give a victim the impression that they are creating a problem by reporting abuse or make a victim feel ashamed for making a report.

**2.6** GLL acknowledges that some children, young people and adults at risk have special needs (including learning or physical disabilities) that make them more vulnerable, potentially at greater risk of harm and in need of a higher level of support. GLL is committed to taking appropriate action to enable these children, young people and adults at risk to access its facilities safely and enjoy a wide range of activities. GLL recognises that not all vulnerability is obviously noticeable.

**2.7** GLL recognises that all children, young people and adults at risk have an equal right to protection and is committed to applying the standards laid out in this policy consistently, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

**2.8** Following the publication of Working Together to Safeguard Children (July 2018) statutory guidance, GLL recognises that those working with children should be particularly alert to the potential need for early help for a child who meets certain profile characteristics – e.g. those with special educational needs, young carers, those at risk of modern slavery/trafficking/exploitation, those who frequently go missing from care or home, those at risk of radicalisation, those who

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return home to their family from care, those who face challenges around drug, alcohol, domestic abuse and mental health issues and those who are privately fostered children.

**2.9** The publication of Making Safeguarding Personal (Guide: 2014) is recognised by GLL as representing a shift in culture and practice for adults at risk and to what we now know about what makes safeguarding more or less effective from the perspective of the person being safeguarded. This new culture and practice is about having conversations with people about how we might respond to safeguarding situations in a way that enhances the involvement of the adult, their choice and control as well as improving their quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them. It is about collecting information about the extent to which this shift has a positive impact on people's lives. It is a shift from a process supported by conversations to a series of conversations supported by a process.

**2.10** For adults at risk, where appropriate, GLL will consider the principles and procedures outlined in the Mental Capacity Act (2005) and the Mental Capacity Amendment Act (2019) and the Liberty Protection Safeguards (LPS), due to come into effect in April 2022, which replace the Deprivation of Liberty Safeguards (DoLS) - see Age UK Factsheet (February 2018).

**2.11** GLL will promote an open and transparent culture amongst its staff and on its premises, recognising, responding, recording, reporting and sharing information appropriately on all safeguarding concerns it becomes aware of no matter how small and even ones just causing a sense of unease or 'nagging doubt' that an adult working children, young people or adults at risk may have acted in a way that:

- Is inconsistent with the safeguarding code of conduct, reflects poor practice, including inappropriate conduct outside of work and
- Does not meet the threshold to consider a referral to a local authority Designated Officer (LADO).

These concerns are sometimes called 'low-level' concerns/neutral notifications and such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

**2.12** Examples of such behaviour could include, but are not limited to:

- Being over friendly
- Having favourites
- Using inappropriate sexualised, intimidating or offensive language
- Taking photographs of children/adults at risk on their mobile phone



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- Engaging with a child/adults at risk on a one-to-one basis in a secluded area or behind a closed door
- Communicating with a child/adult at risk via messaging services without parents/carers involvement.

**2.13** GLL will strive to create an environment where staff are encouraged and feel confident to self-refer, where, for example they have found themselves in a situation, which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

### **3.0 CONTEXTUAL SAFEGUARDING AND CHILD-ON-CHILD ABUSE**

**3.1** Contextual Safeguarding expands the objectives of child protection systems, recognising that young people are vulnerable to abuse in a range of social contexts.

**3.2** As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online.

**3.3** These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines, trafficking, online abuse, sexual exploitation and the influences of extremism leading to radicalisation. These threats, which are outside the control of their families, cannot necessarily be addressed by traditional social work interventions, which focus on individual children and families. Contextual Safeguarding aims to create safety in the places and communities in which young people spend their time.

**3.4** Extremist groups use the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered. See **A Guide To The Prevent Duty OPs-G6**.

**3.5** Children can abuse other children. This child-on-child abuse and can take many forms. This can include, but is not limited to, bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting, the sharing of nude or semi-nude images and initiating/hazing type violence and rituals. In cases of child-on-child abuse or alleged child-on-child abuse all children involved should be treated as being at potential risk, including the child allegedly responsible for the abuse. Whilst it is more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.

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**3.6** Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

**3.7** Sexual harassment is 'unwanted conduct of a sexual nature' and can occur online and offline and includes; sexual comments/'jokes'/taunting, physical behaviour and online sexual harassment (non-consensual sharing of images/videos, bullying, unwanted comments/coercion/threats) and upskirting. 'Upskirting' is now a criminal offence and is defined as 'taking a picture under a person's clothing without them knowing with the intention of viewing body parts for sexual gratification or cause the victim humiliation/distress/alarm'.

**3.8** Where appropriate, when responding to allegations/concerns of child-on-child abuse GLL will consult the relevant safeguarding partner and any relevant practice guidance issued by it. GLL will also consult the new advice which has been issued by the Department for Education (Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, December 2017), as appropriate, if relevant to any allegations/concerns raised in relation to child-on-child abuse.

**3.9** As with all types of child and adult abuse, GLL look to take a preventative approach to child-on-child abuse.

## **4.0 ROLES AND RESPONSIBILITIES**

**4.1** Managers are responsible for:

- Logging and reporting incidents, allegations or concerns
- Briefing and communicating with senior management and following any incident through to its conclusion with a Designated Safeguarding Officer (DSO)
- Publicising and promoting this policy and procedure to staff, parents/carers, children/young people, adults at risk
- Creating an environment which is safe and supportive
- Working with Human Resources to ensure that all staff working on GLL premises are safe and competent to do so
- Ensuring that the staff they manage follow the Safeguarding Code of Conduct
- Understanding and following the procedures laid out in this policy for addressing any concerns reported to them in relation to children, young people and adults at risk
- Booking staff onto the relevant training for their roles
- Ensuring correct supervision is included in respect of safeguarding.

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**4.2** Staff (including employees, casual staff, agency workers and volunteers) are responsible for:

- Reading and understanding this policy and procedure
- Taking all reasonable steps to ensure the safety and wellbeing of the children, young people and adults at risk involved in activities for which they are responsible
- Following the Safeguarding Code of Conduct
- Attending the correct level of training for their role and demonstrating understanding and competency
- Understanding the procedure to follow if issues are raised about the safety or welfare of children, young people or adults at risk

**Recognising** signs/indicators of possible abuse

**Responding** appropriately (doing nothing is not an option)

**Recording** what they have seen, heard or been told

**Reporting** all concerns to the relevant senior manager.

**4.3** The National Safeguarding Manager is the lead for the organisation and is responsible for:

- Taking overall responsibility for GLL's practices and procedures relating to the safeguarding of children, young people and adults at risk
- Raising awareness of safeguarding issues amongst managers and staff and amongst parents/carers and children and young people and adults at risk using GLL facilities, including publicising and promoting this policy and procedure
- Regularly reviewing this policy and procedure and the Safeguarding Code of Conduct to ensure that they continue to meet statutory and organisational requirements
- Liaising with, working with, seeking advice from and making referrals to the Local Authority Multi Agency Safeguarding Hubs (MASH), safeguarding partners, Safeguarding Adults Boards, police, local authority Designated Officers (LADOs), Children's social care/services, OFSTED, adult social care/services, Health and Social Care Trusts in Northern Ireland and designated staff in Wales as is necessary in relation to the safeguarding of children, young people or adults at risk
- Advising managers and staff on the appropriate course of action to take when a concern about safeguarding is raised, including with regards to information sharing (referring to the principles set out by the HM Government in July 2018 of 'necessary and proportionate, relevant, adequate, timely, secure, record')
- Ensuring safeguarding training is made available to managers and staff, and monitoring attendance
- Ensuring safeguarding training is up to date and reflects best practice

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- Maintaining complete and accurate records of any concerns or issues raised in relation to the safeguarding of children, young people and adults at risk.

## **SECTION TWO – SAFER WORKING PRACTICES**

### **5.0 DUTY OF CARE**

**5.1** All staff working with children, young people and adults at risk on Greenwich Leisure Limited (GLL) premises have a duty of care to safeguard and promote their welfare. This is defined as taking all reasonable steps to ensure the safety of any child, young person or adult at risk engaged in an activity for which they are responsible. All staff working with children, young people and adults at risk are considered to owe them this duty of care, both morally and legally, and failure to do so may be regarded as neglect.

**5.2** The duty of care encompasses the way that staff exercises authority, manage risk, and conduct themselves with the children, young people and adults at risk they work with. Children, young people and adults at risk have a right to be treated with dignity and respect, and to be protected from physical, sexual, emotional abuse and neglect. The staff working with them need to demonstrate integrity, maturity and good judgement at all times.

**5.3** Organisations also have a duty of care towards staff, and part of the purpose of this policy and procedure, and the Safeguarding Code of Conduct, is to ensure that staff are protected from misinterpretation of their actions/intentions.

**5.4** To help facilitate this, wherever possible staff should avoid working on a one to one basis with children, young people and adults at risk in an environment away from other adults as this may leave the member of staff in a vulnerable position. Where one to one working is required, this should be in an open environment, where other people are able to witness the activities.

### **6.0 SAFEGUARDING CODE OF CONDUCT**

**6.1** The Safeguarding Code of Conduct covers the supervision and care of children, young people and adults at risk and is referenced in the Associated Internal Documents section. The Safeguarding Code of Conduct sets out the behaviours and good practice required of all staff (including employees, casual staff, agency workers and volunteers) and others working on GLL premises in relation to:

- Well-being, welfare and safety being paramount
- Reporting allegations, concerns and disclosures
- Reporting low-level concerns
- Sexual violence and sexual harassment
- Working with colleagues and others
- Position of trust/authority
- Inclusion and diversity
- Openness and transparency
- Listening to victims
- Giving and receiving gifts

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- Supervision and care of children
- Professional and personal boundaries, including on social media
- Transporting children and adults at risk
- Core/fundamental British values
- Photography and videos
- Professional behaviour
- Confidentiality
- Record keeping

**6.2** The purpose of the Safeguarding Code of Conduct is primarily to safeguard children, young people and adults at risk, but following it will also help to provide a degree of protection for staff against any misplaced or malicious allegations of inappropriate behaviour.

## **7.0 BREACHES**

**7.1** All staff working on GLL premises are expected to follow the Safeguarding Code of Conduct. If there is a reason why the code should not be followed in a specific case in the interests of a child or adult at risk, then the senior manager on duty should be informed, and the nature of and reasons for the action should be recorded.

**7.2** Any member of staff otherwise found to be in breach of the code, or shown to have failed in their duty of care, is liable to be subject to disciplinary action. Breaches serious enough to constitute gross misconduct will, if proven, lead to dismissal.

**7.3** If any member of staff is alleged to have mistreated, exploited, bullied, victimised, abused or in any other way subjected a child, young person or adult at risk to harm, then the procedure set out in Section Three should be followed.

**7.4** Where a member of staff's actions are potentially unlawful, this will be referred to the Police for investigation and may result in criminal prosecution.

## **SECTION THREE – PROCEDURES FOR RESPONDING TO/RAISING CONCERNS**

### **8.0 PROCEDURE FOR RESPONDING TO/RAISING CONCERNS ABOUT A CHILD'S WELFARE**

**8.1** If a member of staff witnesses anything which gives them cause for concern about the welfare of a child or recognises signs or symptoms that a child might be being harmed, then they should follow the procedure outlined below (unless they believe the alleged perpetrator to be another member of staff, in which case the procedure under 11.0 should be followed).

Harm to a child may include:

- **Physical abuse** – hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child

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- **Emotional abuse** – persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development
- **Sexual abuse** – forcing or enticing a child to take part in sexual activities (which may include physical activities or non-contact activities such as looking at sexual material)
- **Neglect** – the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development
- **Exploitation** – human trafficking, forced labour and modern slavery, which includes sexual exploitation and sexual abuse, forced prostitution and the exploitation of children for the production of child abuse images and videos. This type of child abuse is listed a separate entity in Northern Ireland but is covered by the other 4 types in England, Wales and Scotland
- **So-called ‘honour-based’ violence (HBV)** – incidents or crimes which have been committed to protect or defend the honour of the family/community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing/flattening

Signs/indicators may include:

- **Physical indicators** – repeated injuries, bruises, burns, marks from implements etc. (maybe inconsistent stories/excuses about injuries)
- **Behavioural indicators** – unexplained changes in behaviour (becoming withdrawn or aggressive), distrust of adults, changes in performance or attendance, reluctance to remove clothing

**8.2** Whilst any child may benefit from early help, HM Government suggests organisations are particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care

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- Is a privately fostered child.

### **8.3** The member of staff should:

- Report their concerns immediately to the most senior manager on duty, who must complete a PRIME report and may seek advice from a Designated Safeguarding Officer (DSO) if necessary
- Write a statement recording their concerns in a clear factual way, providing as much detail as possible about the child, the alleged perpetrator (if known) and the incidents/signs leading them to raise the concern
- Ask open, not leading, questions with regards to incidents/injuries, keep an open mind and not make assumptions or offer explanations when gathering facts or factual information about an allegation, incident or injury. Information gathering is distinct from a 'formal' investigation
- Avoid discussing the matter further with the child or parents/carers if this would potentially put the child at further risk of harm or attempting to investigate the matter themselves until further advice has been taken (to ensure this doesn't conflict or interfere with a police investigation)
- Maintain strict confidentiality and avoid discussing the matter with anyone other than the senior manager, DSO or anyone legitimately investigating/involved in the case
- Not contact the police or Children's Social Care/Services themselves.

### **8.4** If a child discloses to a member of staff that someone in another setting is causing them harm, the member of staff should follow the above procedure, but in addition should:

- Reassure the child that they are right to tell someone
- Listen to the child, but keep questions to a minimum to avoid leading or intimidating them
- Inform the child about the need to share the information with other adults who can help them
- Make a written factual record of the discussion/disclosure as soon as possible
- Follow 8.2 above.

### **8.5** The DSO contacted will decide on the necessary course of action, taking advice from the relevant Multi Agency Safeguarding Hub (MASH) or Health and Social Care Trust in Northern Ireland. This may include referral to the police or Children's Social Care/Services. The parents/carers will normally be informed of the action being taken, unless it is decided in discussion with the MASH team/Police that this is not in the best interests of the child. The DSO involved will also monitor progress in the case, and will provide updates to relevant senior managers (including the Partnership Manager, Regional Director and National Safeguarding

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Manager) and, if appropriate, feedback to the staff member who raised the concerns. A record of all cases raised will be maintained.

**See Flowchart for Responding To/Raising Concerns about a Child's Welfare**

## **9.0 PROCEDURE FOR RESPONDING TO/RAISING CONCERNS ABOUT AN ADULT'S WELFARE**

**9.1** If a member of staff witnesses anything which gives them cause for concern about the welfare of an adult, recognises signs or symptoms an adult might be at risk or an adult discloses that they are being or are in danger of being harmed, then they should follow the procedure outlined below (unless they believe the alleged perpetrator to be another member of staff, in which case the procedure under 11.0 should be followed).

Risks to an adult may include (see Social Care Institute for Excellence update April 2018):

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanction
- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse, so called 'honour-based' violence
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting to
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- **Modern slavery** – slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex or sexual orientation
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in



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relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- **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
- **Radicalisation and recruitment into terrorist organisations** – adults with care/support needs are often targeted by such organisations. Organisations have a role to play in trying to prevent people from being drawn into terrorism. See Revised Prevent Duty Guidance for England and Wales and A Guide To The Prevent Duty.

Signs/indicators that someone has been or is on the way to becoming radicalised are numerous and wide ranging. They could include:

**Emotional signs/indicators** – being short-tempered, angry, exhibiting a new-found arrogance, being withdrawn, depression

**Verbal signs/indicators** – being fixated on a subject, being closed to new ideas/conversations, using new language/ words, asking inappropriate questions, using 'scripted' speech

**Physical signs/indicators** – new tattoos, changes in routines, having a new circle of friends, particular use of the internet, being absent from home/school/college/sports training.

The following 6 principles should inform the ways staff work with adults with regards to safeguarding:

1. **Empowerment** – being supportive and encouraging adults to make their own decisions and give informed consent
2. **Prevention** – staff taking action before harm occurs
3. **Proportionality** – staff making the least intrusive response to the risk presented
4. **Protection** – staff giving support and representation for those in greatest need
5. **Partnership** – staff finding local solutions through services working with their communities
6. **Accountability** – staff delivering accountability and transparency in safeguarding.

**9.2** The member of staff should:

- Seek the consent of the adult at risk concerned to share the information
- Not disclose information about the identity of the adult to anyone else if the adult at risk does not give his/her consent for information to be shared and seems to have the capacity to make that decision

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- Report their concerns without disclosing information about the identity of the adult immediately to the most senior manager on duty, who can seek advice from a DSO if necessary
- Communicate with the adult in a way that supports them in making choices and having control about how they want to live
- Recognise that adults may make decisions about their lives that involve an element of risk-taking
- Ensure the maximum amount of independence, privacy and dignity for the adult is at the heart of everything they do
- Be aware there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in their best interest and/or the public interest because it may affect other people or a serious crime has been committed
- Work with the DSO and manager to make a decision about whether information should be shared if the adult at risk has not given their consent for information to be shared
- Ask open, not leading, questions with regards to incidents/injuries, keep an open mind and not make assumptions or offer explanations when gathering facts or factual information about an allegation, incident or injury. Information gathering is distinct from a 'formal' investigation
- Avoid attempting to investigate the matter themselves until further advice has been taken (to ensure this doesn't conflict or interfere with a Police investigation)
- If information is to be shared, write a statement recording their concerns in a clear factual way and providing as much detail as possible about, the alleged perpetrator (if known) and the incidents/signs leading them to raise the concern or the details of the disclosure made
- Maintain strict confidentiality and avoid discussing the matter with anyone other than the senior manager, DSO or anyone legitimately investigating/involved in the case
- Not contact the Police or the Adult Social Care/Services themselves.

**9.3** The manager will submit a PRIME report about the concern/disclosure. Depending on whether the adult involved has given consent for information to be shared, is considered to have the capacity to make decisions or whether it is considered to be in the public interest/the adult's best interest to share the information, the PRIME report will either be anonymous or contain data that allows the individual to be identified.

**9.4** The DSO involved will decide on the necessary course of action, taking advice from the relevant Adult Social Care team or Health and Social Care Trust, and may have a conversation about the correct course of action with the local authority safeguarding adults team without

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disclosing the identity of the person in the first instance. This may include a referral to the Police or Adult Social Care/Services. The DSO will also monitor progress in the case, and provide updates to relevant senior managers (including the Partnership Manager, Regional Director and National Safeguarding Manager) and, if appropriate, feedback to the staff member who raised the concerns. A record of all concerns raised will be maintained.

**See Flowchart for Responding To/Raising Concerns about an Adult's Welfare**

## **10.0 PROCEDURE FOR RESPONDING TO/RAISING CONCERNS ABOUT A MEMBER OF THE PUBLIC'S BEHAVIOUR**

**10.1** Any member of staff witnessing behaviour from a member of the public that causes them to have concerns about the welfare and safety of a child or adult at risk, should follow the procedure outlined below:

Concerning behaviour may include:

- Attempting to photograph or video a child or adult without permission
- Loitering and watching children or adults without cause, particularly when they are in a state of undress (such as in a swimming pool or changing rooms)
- Approaching and talking to children or adults in a way that makes them appear uncomfortable
- Any kind of physical contact with a child or adult who does not know them
- Causing significant harm to a child or adult.

**10.2** The member of staff should:

- Report their concerns immediately to the most senior manager on duty
- Continue to monitor the suspect while they are in the building to ensure that no children or adults are at risk whilst the manager is deciding on the correct course of action
- Record a full description of the individual (sex, age, skin tone, hair, height, build, dress and distinguishing features) with their membership number and vehicle registration if available
- If applicable, try to distract the suspect from leaving the building in a non-confrontational way (having due regard for their own personal safety) if the Police have been called
- Maintain strict confidentiality and avoid discussing the matter with anyone other than the senior manager, DSO or any other staff legitimately involved.

**10.3** The manager should:

- Inform a DSO and the General Manager/Partnership Manager
- Decide, in consultation with the DSO and General Manager/Partnership Manager, whether it is necessary to call the Police (but dial 999 immediately if an assault has been committed or there is imminent danger)

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- If appropriate, inform the parents/carers of the child/children of the concerns raised and actions taken
- Complete a PRIME report of the incident as soon as practically possible (and preferably within 24hrs of the incident occurring/concerns being raised)
- Maintain strict confidentiality and avoid discussing the matter with anyone other than the member of staff who raised the concern, the parents/carers, the DSO and the Police.

#### **10.4 The DSO should:**

- Help decide whether it is necessary to call the Police
- Inform the relevant senior managers (including the Partnership Manager, Regional Director and National Safeguarding Manager)
- Monitor progress in the case and provide feedback to the relevant senior managers, the staff member who raised the concern and the child(ren)'s parents/carers, especially if the Police are called
- Ensure a full record of the case is maintained on PRIME.

**See Flowchart for Responding To/Raising Concerns about a Member of the Public's Behaviour**

### **11.0 PROCEDURE FOR RESPONDING TO ALLEGATIONS MADE AGAINST/CONCERNS RAISED ABOUT A MEMBER OF STAFF**

**11.1** If an allegation is made or concern is raised in relation to a child, young person or adult at risk and the behaviour/conduct of a member of staff, by a parent, child, member of the public or other member of staff, the matter must be taken very seriously and dealt with promptly and appropriately, using the following procedure:

#### **Learning of allegations/concerns**

**11.2** Managers or staff may encounter allegations made/concerns raised about a member of staff from a number of different sources and their approach may need to differ slightly depending on how the matter comes to light.

**11.3** In all cases, as much information should be gathered as possible from the complainant to allow the matter to be considered, investigated or escalated effectively. This should be done sensitively and confidentially, away from other parents, children or members of the public. Notes should be made of all information gathered.

**11.4** If a member of staff does not feel equipped to obtain the necessary information, they should ask the complainant if they can wait while they go and get a manager or more senior staff member.

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In any case, they should inform the complainant that a manager is likely to contact them to obtain further information as part of an investigation or information gathering exercise.

**11.5** If a child or adult at risk is physically hurt, appropriate medical attention should be sought immediately.

#### **Allegations/concerns from a parent/carers**

**11.6** If a parent/carers makes the allegation/raises the concern, the staff member will need to ask them for:

- Full details of the incident/concerns, including details of the alleged perpetrator
- Information about whether they witnessed the events or were told about them (and, if the latter, who told them)
- Details of any reaction by the child or adult at risk
- Their (i.e. the parent/carers's) and the child's or adult's at risk full contact details.

#### **Allegations/concerns from a child**

**11.7** Particular care needs to be taken when listening to disclosure of allegation/concern from a child to ensure that they are dealt with age appropriately, sensitively and the child does not feel intimidated. Ideally, discussions should take place with another member of staff present as a witness. A single member of staff should not talk to the child in a closed room. The member(s) of staff should:

- Reassure the child that they are right to tell someone and that they are not in trouble
- Listen to the child, but keep questions to a minimum to avoid leading or intimidating them
- Inform the child about the need to share the information with other adults who can help them and if possible gain the child's consent for this information sharing
- Make a written factual record of the discussion as soon as possible
- Report the allegation/concern immediately to the most senior manager on duty, who will then contact the DSO and HR Business Partner/HR Advisor in order that they can take advice and initiate appropriate action.

#### **Allegations/concerns from a member of the public**

**11.8** If a member of the public makes the allegation/raises the concern, the staff member will need to ask them for:

- Full details of the allegation/concern, including details of the child or adult at risk involved and who the allegation is made against or concern raised about
- Confirmation of whether they witnessed the events or were told about them (and, if the latter, who told them)

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- If the member of public does not know the names of the people involved, then sufficient details, dates, times, descriptions etc. should be taken so as to allow the individuals involved to be identified
- If the member of public does know the names of staff involved, check how they know them and what previous interaction they have had with them
- Their (i.e. the member of the public's) full contact details
- Report the allegation/concern immediately to the most senior manager on duty so the relevant child/adult at risk can be identified. The manager will then contact the DSO and HR Business Partner/HR Advisor in order that they can take advice and initiate appropriate action.

#### **Allegations/concerns from another member of staff**

**11.9** If a member of staff wishes to make an allegation of harm to a child, young person or adult at risk or raise a concern of poor practice by another member of staff, they should:

- Report their allegation/concern verbally to the most senior manager on site
- Write a statement giving the date and time of the incident, a full account of the circumstances, details of who else was there and any other information which might help with an investigation
- Be prepared to attend an investigatory meeting and be a witness at a disciplinary hearing if there is found to be a case to answer.

#### **Reporting the allegation/concern**

**11.10** Any member of staff being told about an allegation/concern must notify the most senior manager on duty at the premises immediately.

**11.11** The senior manager must report all allegations/concerns to the DSO and People Business Partner/People Advisor at the earliest opportunity.

**11.12** The DSO and People Business Partner/People Advisor will require as much information as possible to enable them to decide on the correct course of action. This will include (where available):

- The child/adult's name, home address (including postcode), telephone number and date of birth
- The name and details of the person making the allegation/raising the concern and those of the person they raised them with
- The name and details of the alleged perpetrator (if known)
- Dates and times of incidents, any special factors or other relevant information if known
- The child/adult's account, if available, of what happened

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- Confirmation of whether the parents/other agencies have been contacted
- Details of any witnesses (if known).

**Confidentiality must be observed throughout this process**

### **Taking appropriate action**

**11.13** The DSO and People Business Partner/People Advisor will use the information provided by the complainant and senior manager to identify the correct course of action, taking advice from the relevant local authority Designated Officer (LADO), who should always be notified (within one working day) of any allegations which meet threshold criteria and relate to a member of staff:

- Behaving in a way that has harmed a child or may have harmed a child
- Possibly committing a criminal offence against or related to a child
- Behaving towards children in a way that indicates they may be unsuitable to work with children.

**11.14** Action by the DSO and People Business Partner/People Advisor may include referral to/informing:

- The Police in order for a Police investigation of a possible criminal offence to be initiated
- Children's Social Care/Services for an assessment to see if the child is in need of protection or other services
- OFSTED (if involving a registered provision)
- Adult Social Care/Services for an assessment to see if the adult is in need of additional support/services
- The relevant sport National Governing Body Welfare Officer or Safeguarding Manager
- The local authority Designated Officer or Designated Senior Manager in Children's Social Services in Wales
- Relevant senior managers (including the Partnership Manager, Regional Director and National Safeguarding Manager).

**11.15** Having taken advice, the DSO and People Business Partner/People Advisor will discuss and agree with the relevant senior managers how the alleged perpetrator will be informed of the allegation/concern.

**11.16** The DSO and People Business Partner/People Advisor will also need to consider what support may need to be provided for the parties involved in the process, including children and their parents/guardians, adults with care/support needs and the alleged perpetrator.

**11.17** Unless a Police, Children's Social Care/Services or Adult Social Care/Services investigation is taking place and GLL has been asked to wait for this to be completed, an appropriate manager

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will be identified to undertake an investigation into the allegation/concern. This investigation will include obtaining any additional information necessary from the complainant, children, parents/guardians and adults at risk, interviewing witnesses and holding an investigatory meeting with the alleged perpetrator to obtain their version of events.

**11.18** Even where the matter is relatively minor, or believed to be unfounded, and is likely to result in informal or no actions being taken, some level of investigation should be undertaken to reassure all parties that the matter is being taken seriously and there is nothing more untoward behind the allegations/concerns.

**11.19** The Investigating Officer should aim to complete their investigation in line with target timescales laid out in safeguarding guidance.

**11.20** Where a matter, if proven (substantiated), would constitute serious or gross misconduct, the member of staff may be suspended in accordance with the Disciplinary Policy and Procedure.

**11.21** If, following the investigation, it is felt that there is a disciplinary case to answer, then a disciplinary hearing will be set up in accordance with the Disciplinary Policy and Procedure. The disciplinary hearing should aim to take place in line with target timescales laid out in safeguarding guidance.

**11.22** If, following a disciplinary hearing, a staff member is dismissed or GLL ceases to use the services of someone who is not a direct employee, then the DSO will consult the local authority Designated Officer and/or local authority MASH team to determine whether a referral to the Disclosure and Barring Service (DBS) is required. This is likely to be appropriate if the individual is deemed unsuitable for further work with children or adults at risk.

**11.23** If, following investigation, the view is taken that there is not a formal disciplinary case to answer, other informal action may be considered appropriate. This may include:

- An informal warning being given
- Increased management or supervision
- The setting of more stringent boundaries for the staff member to work within
- Training or other input to help the individual understand how their behaviour might have been misinterpreted or how to improve their practice.

**11.24** If the allegation/concern is found to be malicious or unfounded, further consideration will need to be given to any support the member of staff may need to enable them to come to terms with the incident and resume effective working. This may include support from their manager, the staff team, occupational health or available counselling services.



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**11.25** If the allegation/concern relates to a DSO another one of the DSO team and People Business Partner/People Advisor should be consulted. If the allegation/concern relate to a senior member of the management team it should be reported directly to the Associate Director of National Standards and Compliance.

### **Monitoring Progress and Record Keeping**

**11.26** The DSO and People Business Partner/People Advisor should regularly monitor progress with the case and ensure the necessary liaison takes place between any external bodies involved (such as the Police or local authority Designated Officer) and those carrying out the internal processes.

**11.27** Written feedback on progress with the case (whether internal or external) should first be discussed with the Partnership Manager before being submitted to the:

- Parents/guardians and child/young person
- Adult at risk
- Complainant (if not one of the above)
- Member of staff that the allegation has been made against/concern raised about
- General Manager, National Safeguarding Manager, HR Director and Associate Director of National Standards and Compliance.

This feedback may include (as relevant):

- The referral of the matter to the local authority MASH team and/or Designated Officer
- Any decision to refer to the Police or Children's Social Care/Services or Adult Social Care/Services
- The timescales for the internal investigation
- The suspension of the member of staff
- Any decision to proceed to a disciplinary hearing and the outcome of that hearing.

**11.28** For each case, the DSO and HR Business Partner/HR Advisor will keep a clear and comprehensive written record of the:

- Nature of the allegation made/concern raised
- Actions taken (including referrals to other agencies)
- Outcomes and findings of the internal investigation/disciplinary process
- Outcomes of any external investigations.

**11.29** A copy of this record will be provided to the staff member and a copy which has been authorised and signed by the HR Director will be kept on the individual's personal file until the

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accused has reached normal pension age or for a period of 10 years from the date of the allegation/concern if that is longer (regardless of whether the person leaves the organisation). This is to enable GLL to give an accurate response to requests for references and to prevent unnecessary re-investigation if concerns arise again at a future date.

**11.30** All information about the case will be stored securely and treated with the utmost confidentiality.

**See Flowchart for Responding To Allegations Made Against/Concerns Raised About a Member of Staff**

## **12.0 WHISTLEBLOWING**

**12.1** If any member of staff or others working on GLL premises (including external hirers) have concerns about poor working practices in relation to children or adults at risk or believe that the welfare of children or adults at risk is not being taken seriously, they should discuss these in the first instance with their manager or the most senior manager on duty.

**12.2** Concerns about the welfare of individual children or adults at risk should normally be raised under this policy and procedure. However, if a member of staff is concerned about a wider organisational issue or has raised concerns under the above procedures and feels that the matter had not been taken sufficiently seriously, then they can take the matter further using the Whistleblowing Policy and Procedure. This policy supports staff and others to raise concerns made in good faith without fear of repercussion.

**12.3** Employees who are worried about the way their, or another, organisation is dealing with child safeguarding/protection issues and who don't feel able to escalate these issues internally can contact the NSPCC Whistleblowing Advice Line. It can be reached for free on 0800 028 0285 and can be contacted anonymously.

## **13.0 COMPLAINTS**

**13.1** Where a parent/carer or member of the public has concerns about poor working practices or has raised an issue that they feel has not been taken sufficiently seriously, they can take the matter further under the Customer Comments and Complaints Procedure.

## **SECTION FOUR – ORGANISATIONAL MEASURES TO SAFEGUARD CHILDREN/ADULTS AT RISK**

### **14.0 NATIONAL SAFEGUARDING MANAGER**

**14.1** The GLL National Safeguarding Manager is the Safeguarding Lead for the organisation and has the key responsibility for safeguarding in the organisation and has undertaken the necessary training to enable them to:

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- Set up the appropriate organisational procedures, systems and practices to ensure GLL's responsibilities for safeguarding are fully met
- Advise managers and staff on safeguarding issues and the appropriate course of action to take when a concern about a child or an adult at risk is raised
- Liaise with other agencies (such as the local authority MASH team and/or Designated Officer, Police, Children's Social Care/Services, Adult Social Care/Services, Health and Social Care Trust and OFSTED) as is necessary in relation to safeguarding matters.

**14.2** A list of DSOs and Safeguarding Trainers by Region can be obtained from the National Safeguarding Manager and is available on the IMS Documents section of the intranet.

## **15.0 RECRUITMENT PROCEDURES**

**15.1** GLL recognises that the nature of the services it provides may attract a small minority of people with harmful or unlawful intentions towards children or adults at risk and is committed to ensuring that all reasonable steps are taken to prevent such people from working on its premises and/or for the organisation.

**15.2** All staff working with children, young people or adults at risk must be recruited following GLL's recruitment and selection procedures. These require potential candidates to:

- Complete an application form, providing information about their qualifications and full career history
- Complete a form to declare all past and/or current criminal convictions and/or investigations, and consent to a DBS check being undertaken
- Undertake an interview, during which any gaps in employment history or unusual employment history patterns should be accounted for
- Provide 2 professional references
- Provide evidence of identity (such as passport or driving licence) with a photograph
- Provide evidence of having obtained the relevant qualifications
- Meet all person specifications for posts working with children or adults at risk including the qualifications and competencies necessary to work with and safeguard children, young people and adults at risk
- Be informed at the outset that GLL has a Safeguarding Policy and Procedure and Safeguarding Code of Conduct that it stringently applies
- Have references and qualifications checked thoroughly for posts working with children or adults at risk
- Have an enhanced DBS and children's barred list check certificate for anyone appointed to relevant posts.

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## **16.0 SAFEGUARDING TRAINING**

**16.1** All staff (including casual staff, agency workers and volunteers) will be informed of the need to adhere to the provisions of the Safeguarding Policy and Procedure and Safeguarding Code of Conduct as part of their induction when they commence work.

**16.2** In addition:

- All staff who work regularly with children, young people and adults at risk are required to complete the GLL training on Safeguarding Children and Adults (classroom based) and/or Safeguarding Awareness (online module), with records being kept to demonstrate completion
- Coaching staff are encouraged to attend their National Governing Bodies safeguarding training module. Where possible at least one coach at each session should have attended safeguarding training
- Where possible managers involved in the recruitment of staff should have attended GLL's Recruitment and Selection training to ensure that they understand safer recruitment practices
- Staff with particular responsibilities for safeguarding (including the National Safeguarding Manager and DSOs) will attend the DSO training course every two years.

**16.3** Safeguarding training for staff will include information on:

- The purpose and need for safeguarding and child protection
- Preventative and precautionary measures
- Recognising signs and indicators of abuse and neglect
- Responding - personal responsibilities for safeguarding
- Recording and reporting - procedures to follow in response to concerns.

## **17.0 RECORD KEEPING**

**17.1** GLL recognises that it is essential that confidential, accurate and comprehensive written records are maintained wherever concerns are raised about the conduct of anyone working with or coming into contact with children, young people and adults at risk. The National Safeguarding Manager is responsible for maintaining these records.

**17.2** Records of any concerns raised about the welfare of children or adult's at risk in relation to the conduct of staff, parents/carers, members of the public or adults in other settings will also be maintained by the National Safeguarding Manager, along with any safeguarding related issues raised under the Whistleblowing Policy and Procedure or Customer Comments and Complaints Procedure.

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**17.3** All written records relating to safeguarding will be securely stored and treated with the utmost confidentiality, only being shared with those who have a legitimate right to obtain information about the specific case.

**17.4** Safeguarding reports, providing (anonymised) information on any new cases raised and referrals made will be provided to the Senior Leadership Team on a quarterly basis. A Safeguarding Report, containing summary information about the number and type of cases raised during the course of the year and any other relevant strategic information, will be provided to the GLL Senior Leadership Team and Board annually.

**17.5** Under section 11 of the Children Act any safeguarding records required by the local authority will be made available to them.

## **18.0 ORGANISATIONS THAT DELIVER IN GLL FACILITIES**

**18.1** Organisations that deliver services to children, young people and adults at risk in GLL facilities will be required to sign a declaration confirming that they have safeguarding policies and procedures in place that comply with the requirements of Sections 10 and 11 of the Children Act 2004, Working Together to Safeguard Children 2018 and the Care Act 2014. GLL reserves the right to request copies of these policies and procedures at any time.

**18.2** Bookings should be dealt with in accordance to Contract for Hire of Venue.

**18.3** If any member of staff is concerned about the safety or welfare of any children, young people or adults at risk engaged in an activity run by an external group, they must follow the procedure laid out in Section Three and inform the most senior manager on duty immediately.

## **19.0 ASSOCIATED INTERNAL DOCUMENTS**

**Safeguarding Code of Conduct LD-SG-G-7**

**Safeguarding Code of Conduct Supplementary Information LD-SG-G-8**

**Flowchart for Responding To/Raising Concerns About a Child's Welfare LD-SG-G4**

**Flowchart for Responding To/Raising Concerns About an Adult's Welfare LD-SG-G9**

**Flowchart for Responding To/Raising Concerns About a Member of the Public's Behaviour LD-SG-G3**

**Flowchart for Responding To Allegations Made Against/Concerns Raised About a Member of Staff LD-SG-G2**

**Disciplinary Policy and Procedure CON-DISC-POL-1**

**List of Designated Safeguarding Officers and SG Trainers by Region – available from the National Safeguarding Manager and on IMS Documents section of the intranet**

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**Whistleblowing Policy and Procedure CON-WB-POL-1**

**A Guide To The Prevent Duty OPS-G6**

**Customer Comments and Complaints Procedure OPs-OP20**

**Contract for Hire of Venue FIN-F25**

## **20.0 FOR FURTHER INFORMATION**

**The Children Act 2004**

**Working Together to Safeguard Children (2018)**

**Keeping Children Safe in Education (2021)**

**The Children (Northern Ireland) Order 1995**

**The Safeguarding Board Act (Northern Ireland) 2011**

**The Children's Services Co-operation Act (Northern Ireland) 2015**

**All Wales Child Protection Procedures (2019)**

**The Social Services and Well-being (Wales) Act 2014**

**The Well-being of Future Generations (Wales) Act 2015**

**Disqualification under the Childcare Act 2006 (2018)**

**The Care Act (updated July 2018)**

**Making Safeguarding Personal (Guide: 2014)**

**Contextual Safeguarding: An overview of the operational, strategic and conceptual framework (2017)**

**Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2018)**

**Information Sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)**

**Mental Capacity Act (2005)**

**Mental Capacity Amendment Act (2019) – including the Liberty Protection Safeguards**

**Age UK Factsheet (February 2018)**

**Types and indicators of adult abuse updated, Social Care Institute for Excellence (April 2018)**

**Revised Prevent Duty Guidance for England and Wales (2015)**

**Children and Social Work Act (2017)**

**Developing and implementing a low-level concerns policy: A guide for organisations which work with children Farrer & Co (2020)**