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BRITISH PARALYMPIC ASSOCIATION Safeguarding Vulnerable Adults Policy

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Glossary of terms used in the safeguarding of Vulnerable Adults:

Abuse	See Appendix One.
Adult	A person of, or over the age of, 18 years.
Advocate	An individual who speaks on behalf of, or represents the interests of, the vulnerable adult where appropriate.
Athlete	A generic term to include individuals from all sports as well as those who may be part of ParalympicsGB, or an employee who may be a Vulnerable Adult.
British Paralympic Association (BPA)	The National Paralympic Committee recognised by the International Paralympic Committee and responsible for the selection and organisation of the Great Britain and Northern Ireland Team for the summer and winter Paralympic Games (ParalympicsGB).
ParalympicsGB	The British Team at the Summer and Winter Paralympics Games, selected by BPA and signed a Team Members or Associate Team Members Agreement.
Child(ren)	Anyone under the age of 18.
Children and Vulnerable Adults Social Care	The Local Authority statutory agency with

responsibility for safeguarding and protecting Services children and families, formerly known as Social Services.

Criminal Records Check

A service carried by a government agency that checks the criminal record history of a potential employee or volunteer who will be working in a Regulated Activity that includes close or regular contact with Children or Vulnerable Adults, on behalf of organisations and recruiters throughout the United Kingdom. In England and Wales this agency is the Criminal Records Bureau; in Scotland it is called Disclosure Scotland, and in Northern Ireland checks are made through AccessNI.

Disclosure

The information contained on a certificate, or otherwise, issued by one of the Criminal Records Checking agencies (see above). The word may also be used to describe a verbal or written referral or information given about another individual or a child about whom someone has safeguarding concerns.

Duty of Care

The duty that rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of any person involved in an

activity for which that individual or organisation is responsible

Disclosure Barring Service (DBS)

Primary role to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups including children. The DBS was established under the protection of Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau and Independent Safeguarding Authority

Local Protection of Vulnerable Adults

These Vulnerable Adult protection committees (LPVAC) have responsibility for the co ordination of work undertaken by agencies involved both in providing services to and safeguarding Vulnerable Adults. LVAPCs provide local inter-agency guidelines detailing procedures for cases of actual or suspected abuse. Some areas have established sports sub-groups to inform their work. There are similar structures for children called Local Safeguarding Children's Boards (LSCBs).

Carer

A generic term that includes parents, carers and guardians.

Personnel

Employees of BPA, its affiliated NGBs, contracted suppliers or of

facilities used in the course of organizing its duties as a National Paralympic Committee, as well as volunteers.

Position of Trust

This is where an individual, such as a coach, team leader or member of staff who makes decisions for or about a vulnerable person, can influence a Vulnerable Adult's actions and may misuse that position to groom or Abuse the Athlete or individual. This position can be a positive one, in building confidence and self-esteem for vulnerable people.

Registered Body

An organisation that is able to act as recipient of CRB information on behalf of its members.

National Governing Body (NGB)

The organisation recognised by the International Federation for each sport as the body that selects British or UK teams for international competition.

Regulated Activity

Activity which involves:
Teaching, training, instructing, caring for or supervising children;
OR
Providing guidance/advice on well-being;
OR
Driving a vehicle only for children

AND

Happens frequently (once a week or more often)

OR

Happens intensively (on 4 or more days in a 30-day period, or overnight)

AND

The individual carrying out the activity of teaching, training or instructing is unsupervised

Regulated Activity Provider

The person or organisation responsible for employing or deploying workers to facilitate a Regulated Activity, whether these workers are paid or unpaid.

Risk assessment

A procedure to help identify possible sources of danger and take appropriate action to minimise these risks taking into account the age, number, impairment type and competence of participants.

Safeguarding Officer (LSO or DSO)

The BPA will appoint a Lead Safeguarding Officer (LSO) from its staff whose responsibilities are set out in section 4.1. At each BPA event a designated officer(s) (DSO) will be appointed for the period of that event, their responsibilities are set out in section 4.2

Vulnerable Adult

A person, 18 years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

No Secrets - definition based on that set out in the 1997

Consultation paper: "Who Decides?" Issued by the Lord Chancellor's Department.

In respect of sporting activity a person is also regarded as a Vulnerable Adult under the Vetting and Barring Scheme when they are:

- Receiving any form of medical care or therapy, such as being treated by a physiotherapist
- Receiving a service or participating in an activity that is specifically targeted at people with age-related needs or disabilities.

1. Safeguarding and Protecting Vulnerable Adults Policy

1.1 General principles

Every organisation that provides services for vulnerable adults has a part to play in safeguarding and promoting their welfare. The key elements to safeguarding include:

- The protection of vulnerable adults from abuse and neglect;
- The promotion of practices that contribute to vulnerable adults' safety, health and wellbeing; and
- Ensuring a safe and effective environment for vulnerable adults.

The BPA is the National Paralympic Committee for Great Britain and Northern Ireland. It has the sole mandate in this country from the International Paralympic Committee to select and enter a team for the Summer and Winter Paralympic Games.

The BPA is a membership body, through the National Paralympic Committee, which currently comprises of representatives from National Governing Bodies of Sport, the Home Country Disability Sport Federations and National Disability Sport Organisations, as well as various individuals.

The primary focus of the BPA is to deliver the best prepared ParalympicsGB team to the Summer and Winter Paralympic Games. The secondary foci include; supporting the development of disability sport opportunities across the UK, the inspirational impact of British athletes, influencing thinking and advocating policy on behalf of the Paralympic Movement, engaging decision makers in the UK and internationally and finally, ensuring the BPA is a high performance and robust organisation from London to Sochi, Rio and beyond.

In order to fulfil these strategic objectives some of the core responsibilities include, but are not limited to the selection, management and delivery of the ParalympicsGB team for each Paralympic Games, the provision of world class performance services and advice in support of NGB led programmes, including consideration of Games preparation strategies, multi-sport camps and sport events as well as engagement in targeted programmes for athlete identification and pathway development, in support of NGB and other partner activity as appropriate

The strategic objectives can only be widely achieved where vulnerable adults are safe and protected from harm.

BPA acknowledges that its' membership, and those accessing services include people with disabilities, and that these people can be additionally vulnerable, and may be targeted by those wishing to abuse.

Communication difficulties, isolation, a dependency on others and other factors may contribute to increasing risks to a disabled child's safety and welfare, and impact on their ability to access help and support. Care will be taken to ensure that individual needs are recognised and assessed, and appropriate additional safeguards are put in place.

Although the majority of individuals have a fulfilling experience in sport, some people may experience abuse and/or poor practice linked to their participation. While experience of harm occurs at every level of sport, research shows that vulnerability to abuse and poor practice increases as young athletes make progress through the competitive ranks.¹

It is vital that anyone involved in sports provision for vulnerable adults is alert to:

- Possible indicators of abuse and neglect
- Risks that individual abusers or potential abusers, may pose to vulnerable adults; and
- Understanding what actions they should take should concerns arise

This is particularly important in light of BPA's unique remit to select and enter athletes at elite level. In addition, the membership may have direct contact with vulnerable adults through the programmes delivered by BPA.

The aim of this policy to is to set context, commitment, principles, scope and core practice guidelines for any BPA, work or events that may have vulnerable adults in attendance. (A separate policy has been written to safeguard children that the BPA may come into contact with and can be found on our website www.paralympics.org.uk). These events include but are not limited to Paralympic Potential Days, Preparation Camps, Paralympic Inspiration Programme and the Great Britain and Northern Ireland team at the Paralympic Games.

At all BPA events a welfare plan will be written that shows how this policy is translated into practical action specifically for that event or context. Welfare plans will show how every aspect of the welfare plan will be implemented. All staff/volunteers/participants will be required to read the Welfare Plan carefully and fulfil their respective responsibilities.

¹ The experience of children participating in organised sport in the UK (Kate Alexander Anne Stratford, Ruth Lewis, 2011)

Individuals will be required to sign up to Codes of Conduct/behaviour/team agreement.

The British Paralympic Association recognises its responsibility to work in partnership with other partners and statutory bodies in the event of a concern arising relating to a Child. The BPA assumes that all NGBs will have their own policies covering safeguarding and welfare and whilst this policy does not seek to replace the policies and procedures for individual sports BPA expects participating sports to operate within the guidelines contained within this policy, and the specific event welfare plan, during BPA events and camps and whilst competing under ParalympicsGB team.

1.2 Scope

These policies apply to all Athletes, Personnel, carers, coaches, and anyone involved in a British Paralympic organised event or team. All these people have a duty of care to safeguard the welfare of Vulnerable Adults and prevent their Abuse.

1.3 Why these policies are needed

British Paralympic Association has realised the need for an individual policy for Vulnerable Adults, in line with the considerations of the *Equality Act 2010*, to promote equal opportunities and provide a clearer framework for those who suffer from physical, mental health and learning disabilities.

Vulnerable people are at heightened risk of abuse and discrimination because of their susceptibility and many experience this in all walks of life. Practice has shown that vulnerable people who are victims of Abuse in the sports setting can be reluctant to report their experiences for fear of losing a positive and important part of their lives. Therefore it is essential that all those involved with representing the British Paralympic Association are aware of the indicators of Abuse and can recognise and act appropriately to protect potential victims.

Abuse can occur in many situations, including the home, workplace, day centre, at the shops, on the bus, in educational institutions and of course in the sporting environment.

For the majority of Vulnerable Adults, sport will be a positive and rewarding experience, however, there is a growing recognition that sport generally provides easy access to vulnerable people for those who wish to perpetrate abusive behaviour for their own gratification. Therefore, the BPA is aware of the need to protect Vulnerable Adults from those individuals who may seek to harm them in the sports environment.

Although this document mirrors the *British Paralympic Association Safeguarding and Protecting Children Policy* for practical reasons, there

are fundamental differences between the policies.

The primary difference in addressing Adult and Child Abuse relates to the Adult's right to self-determination. Adults may choose not to act at all to protect themselves and only in extreme circumstances will the law intervene. This is not the case for Children because they are minors under the *Children Act 1980* and this legislation can be used quickly and effectively to ensure protection from abuse once it has been recognised.

In cases of suspected Adult Abuse it is important to recognise that assertive persuasion to encourage the individual to report or take action against an abuser or abusive situation may have negative outcomes for the Vulnerable Adult and could be detrimental to their wellbeing by causing them further harm. Therefore, the protection of Vulnerable Adults from abuse is a more complex process than Child protection and requires policy and procedures that reflect this. Policy users need to develop an understanding that protecting Vulnerable Adults necessitates a more supportive and advisory approach in response to reporting Abuse, than in Child protection situations where the legal framework is clear and definitive and requires stipulated responses. In serious situations the Child can be removed from the abusive environment, for Vulnerable Adults it is not always possible or appropriate to achieve this level of safety.

Each Vulnerable Adult is a unique individual with varying degrees of need and ability. Some people will have a combination of physical and learning disability, others may have one or the other; some may have mental health needs and a combination of other complex disabilities such as Epilepsy, Diabetes, Down Syndrome, visual or hearing impairment.

The appropriateness of involving Carers in any sporting and welfare related decision making will depend on the individual needs and circumstances of the Vulnerable Adult and, most of all, upon their wishes. Often Vulnerable Adults feel strongly that they want to maintain independence and make decisions for themselves; such views should be encouraged and supported wherever possible. Ideally, good practice suggests a partnership model of working involving the BPA, the NGB, coach, the Vulnerable Adult and their Carer. In these circumstances it is important that the Vulnerable Adult is at the centre of the decision-making process.

The provisions in the *Mental Capacity Act 2005* should be considered in relation to Vulnerable Adults and decision-making. Those without the capacity to make decisions under this legislation will be more dependent on their Carer or responsible adult in the decision making process. The act provides that:

"For the purposes of section 2, a person is unable to make a decision

for himself if he is unable—

(a) to understand the information relevant to the decision,

(b) to retain that information,

(c) to use or weigh that information as part of the process of making the decision, or

(d) to communicate his decision (whether by talking, using sign language or any other means).

(2) A person is not to be regarded as unable to understand the information relevant to a decision if he is able to understand an explanation of it given to him in a way that is appropriate to his circumstances (using simple language, visual aids or any other means).

(3) The fact that a person is able to retain the information relevant to a decision for a short period only does not prevent him from being regarded as able to make the decision.

(4) The information relevant to a decision includes information about the reasonably foreseeable consequences of—

(a) deciding one way or another, or

(b) failing to make the decision.”

The BPA encourages the individual's development of independence, confidence and self-esteem on a personal level and in their sporting activities. Hence it is important that everyone involved with the BPA is aware of the need to balance the involvement of Carers and the needs and wishes of individual Athletes in cases where Vulnerable Adults are concerned.

The following policy document draws from and includes relevant legislation and government guidance such as the *Safeguarding Vulnerable Groups Act 2006* and the *No Secrets* guidance (2000) regarding vulnerable people.

1.4 Policy statement

British Paralympic Association is committed to:

- Making the welfare of Vulnerable Adults paramount, even where the rights and needs of the other adults that work with them are overridden in order to provide the necessary protection to these individuals

- Enabling everyone, whatever their age, culture, disability, gender, first language, racial origin, religious belief and/or sexual identity, to participate equitably in sport in a fun and safe environment
- Taking all reasonable steps to protect Vulnerable Adults from harm, discrimination and degrading treatment and have respect for their human rights, wishes and feelings
- Taking all suspicions and allegations of Abuse or poor practice seriously and responding swiftly and appropriately to them in accordance with current procedures
- Ensuring that all BPA employees working with Vulnerable Adults are competent and appropriate for the responsibility and have been provided with relevant awareness training regarding the potential difficulties vulnerable adults can face and how to manage them
- Requiring all staff and volunteers to accept responsibility for the welfare of the Vulnerable Adults in their care in accordance with current legislation and government guidance and procedures, and that they incorporate such policies into their constitutions and rules,
- Ensuring all individuals, and NGBs are mindful of the differences between policies and procedures regarding Vulnerable Adults and those of Children, and particularly that each Vulnerable Adult has the right to self determination in all but the most extreme matters.
- Where appropriate, working in partnership with Carers to support the Vulnerable Adult and, where practicable, cooperating with their wishes to achieve the best outcomes for the Vulnerable Adult.

2. Good practice, poor practice and Abuse

2.1 Introduction

It can be difficult to distinguish poor practice from Abuse, whether intentional or accidental.

It is not the responsibility of any individual involved in sport to make judgements regarding whether or not abuse is taking place, however, all BPA Personnel have the responsibility to:

- recognise and identify poor practice and potential Abuse
- act on this if they have concerns, as explained in section 3.

2.2 Good practice

British Paralympic Association strongly advises, that all those working with Vulnerable Adults:

- hold a recognised coaching qualification
- have completed a recognised Safeguarding Vulnerable Adults Basic Awareness course as a minimum standard.
- fully accept the sportscoachUK Code of Conduct or an equivalent sports-specific code of behaviour
- have appropriate membership to a relevant professional body

Everyone should:

- conduct appropriate risk assessments before carrying out any sports-related activity
- aim to make participation in sport fun and enjoyable
- promote fairness and playing by the rules
- not tolerate the use of prohibited or illegal substances
- treat all Athletes equally and preserve their dignity; this includes giving attention, time and respect to all Athletes regardless of their level of ability

Coaches and those working with Vulnerable Adults should:

- respect the developmental stage of each Athlete and not risk sacrificing their welfare in a desire for club, national or personal achievement
- ensure that the training intensity is appropriate to the physical, social and emotional stage of the development of the Athlete
- work with Vulnerable Adults and their Carers (where appropriate) to develop realistic training and competition schedules which are

suiting to the needs and lifestyle of the athlete, not the ambitions of others such as coaches, team members, Carers or the NGB

- build relationships based on mutual trust and respect, encouraging Vulnerable Adults to take responsibility for their own development and decision-making
- always be publicly open when working with Vulnerable Adults, for example:
 - Avoid coaching sessions or meetings where a coach and an individual Athlete are completely unobserved.
 - maintain an appropriate and open environment with no secrets
 - avoid unnecessary physical contact with Vulnerable Adults. Physical contact may be appropriate where:
 - it is neither intrusive or disturbing
 - the athlete has provided permission openly
 - it is delivered in an open environment
- maintain a safe and appropriate relationship with Athletes and avoid forming intimate relationships with athletes you are working with as this may threaten the position of trust and respect present between Athlete and coach
- be an excellent role model by maintaining appropriate standards of behaviour
- gain the Vulnerable Adult's consent and, where appropriate, the consent of relevant Carers, in writing, to administer emergency first aid or other medical treatment if the need arises
- be aware of medical conditions, impairments, existing injuries and medicines being taken and keep written records of any injury or accident that occurs, together with details of treatments provided
- arrange that someone with current knowledge of emergency first aid is available at all times
- gain written consent from the correct people and fill out relevant checklists and information forms for travel arrangements and trips.

See Appendix One for more information on Good and Poor Practice when working with children.

3. Responding to suspicions and allegations of abuse

3.1 Introduction

Although many cases of Abuse take place within the family setting, Abuse can and does occur in sport.

- It essential that all allegations are taken seriously and appropriate action is taken.
- It is not your responsibility to decide if Abuse of a vulnerable person is taking place.
- It is your responsibility to report your concerns to the appropriate agencies (see below).
- Not acting is not an option.

3.2 Receiving evidence of possible abuse/poor practice

You may have concerns about Abuse and /or poor practice because:

- you see it happening
- you recognise signs such as those listed in Appendix One
- someone reports it to you
- a Vulnerable Adult approaches you directly

3.3 Recording information: confidentiality and information sharing

All concerns that you may have or receive should be recorded, ideally using the BPA Incident Report Form.

You are recording this information for:

- yourself, so you have a record of what happened
- the BPA Designated Safeguarding Officer (DSO) or other designated welfare person within your sport, who will co-ordinate any action that needs to be taken
- the BPA Lead Safeguarding Officer (LSO) so that they can advise you
- the Police/Social Care Services if appropriate

It is not appropriate to share sensitive and confidential information with other people, e.g.

- colleagues
- your fellow team members
- other acquaintances outside the sport or organisation.

Any information relating to Vulnerable Adults disclosures or concerns should be held under secure conditions and made available on a need-to-know basis.

When recording information you should:

- Stick to the facts – what you have seen, heard or had reported to you
- Distinguish between what is your personal knowledge and what you have been told by others
- Do not give your own opinions: be clear when you are giving your own or others' interpretation of events and reason for this (for example if a comment was in response to a question or an unsolicited remark)

3.4 Reporting the concern

The discovery that someone you know may be abusing a Vulnerable Adult will raise feelings and concerns. Although it can be difficult to report such matters, you must remember that:

- the welfare of the Vulnerable Adult is paramount
- being vigilant helps to protect the individual.
- Do not undertake to keep any disclosure of abuse confidential. It is important to explain to the vulnerable person BEFORE a disclosure that you may have to discuss the information they give with a person in a more responsible position than yourself
- Always ensure you have the permission of the individual and/or their Carer (where appropriate) before taking official action regarding the concern. It is important that the individual is able to exercise their right to self-determination unless, in exceptional circumstances, the level of Abuse is very serious and clearly necessitates criminal investigation.
- Do not pressurise the vulnerable person as this can contribute to their stress. Try to negotiate an amicable agreement with the individual about sharing your concerns and be honest about who must be told and what may then happen. Ensure the vulnerable individual feels in control of their information and seek to encourage

the individual to report the Abuse themselves.

- A good reporting structure ensures that concerns are dealt with fairly.

Reporting concerns outside of an event

Ensure you have permission of the individual before taking official action regarding the concern (unless it necessitates criminal investigation). With agreement, concerns should be passed to the BPA LSO, if however the LSO is not contactable and it is urgent, or you are concerned that a vulnerable adult may be in immediate danger then you should report your concerns to a statutory agency and ensure that you follow this up in writing and forward a copy of the BPA report form to the LSO as soon as possible or within 24 hours.

The BPA's Whistleblowing Policy assures all members, staff, and volunteers that it will fully support and protect anyone who, in good faith, reports a concern that a colleague is or may be abusing a vulnerable adult. This policy is available on the British Paralympic Association website.

The BPA LSO can be contacted on- 07747163127 or safeguarding@paralympics.org.uk

The flowchart for reporting concerns can be found in Appendix Four.

Reporting concerns at a Camps/Games

Ensure you have permission of the individual before taking official action regarding the concern (unless it necessitates criminal investigation). With agreement, concerns should be passed to the BPA LSO or DSO, if however the LSO/DSOs are not contactable and it is urgent, or you are concerned that a vulnerable may be in immediate danger then you should report your concerns to a statutory agency and ensure that you follow this up in writing and forward a copy of the BPA report form to the LSO as soon as possible or within 24 hours.

Contact details will be provided in the Games/Camps welfare plan.

The BPA's Whistleblowing Policy assures all members, staff, and volunteers that it will fully support and protect anyone who, in good faith, reports a concern that a colleague is or may be abusing a vulnerable. This policy is available on the British Paralympic Association website.

A template flowchart for reporting concerns at Games and Camp can be found in Appendix Five.

Reporting concerns at other BPA events

Please refer to the specific event welfare plan.

3.4.1 Involving Carers

The BPA is committed to working in partnership with Carers where appropriate. In most situations, it is important that the Designated Safeguarding Officer involves carers to clarify any initial concerns e.g. if a Vulnerable Adult seems withdrawn, it may be that they have experienced a recent bereavement. Consulting Carers or parents must be considered in light of the Vulnerable Adult's right to confidentiality and the *Mental Capacity Act* 2005 and ideally should be undertaken with the full consent of the vulnerable individual. Where there is doubt as to the vulnerable individual's mental capacity to make decisions then advice must be sought from the BPA LSO.

Where it is considered that a Carer may be the perpetrator of (responsible for) the Abuse or is colluding with it, or may not be able to respond to the situation appropriately, they should not be involved, as it may place the vulnerable individual at greater risk.

3.4.2 Involving the BPA and NGB

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

- what further action should be taken by the BPA or sport's NGB
- whether the Vulnerable Adult should consider taking further action or advice
- whether further action, advice or investigation is needed by/from the Police or Social Care Services.

Passing on this information is important because the matter may be just one of a series of other instances which together cause concern. It enables the BPA to work with the NGB to analyse trends and improve existing policy and guidance.

To contact the BPA LSO write to Lead Safeguarding Officer, 60, Charlotte Street, London W1T 2NU, always mark the envelope 'Private and Confidential'. Or telephone **07747163127**; or e-mail safeguarding@paralympics.org.uk

3.4.3 Involving statutory agencies

It should be noted that physical and sexual Abuse is illegal. Consequently there is an obligation that allegations and concerns are reported to the police who will decide whether to take criminal action or not. In some instances, other types of Abuse such as discrimination and financial exploitation may also be considered to be criminal and these should also be reported.

In any case of physical or sexual Abuse or where a Vulnerable Adult's safety is at risk, the Vulnerable Adult must be encouraged to contact one

of the following statutory agencies:

- the local police station or in an emergency, dial **999**. The police should be involved if the abuse is thought to be of a criminal nature. A record should be made of the details of the referral and the crime reference number
- Adult Social Care Services (formerly Social Services). This body has a statutory duty to ensure the welfare of adults in vulnerable positions and are legally bound to investigate allegations of Abuse. Such investigations will involve discussing the matter with the Vulnerable Adult, and where appropriate their Carer. They will also gather information from others who know and are involved with the vulnerable person

In an emergency, Social Care services contact details can be found on your area's County Council website or from the Samaritans (**08457 909090**) who will hold the Duty Officer's contact number.

All telephone referrals made to the statutory agencies must be confirmed in writing within 24 hours detailing the following information:

- the name and title of the member of staff to whom the concerns were passed and the date this happened
- any action that has been taken
- a summary of the information shared and the response received
- the time and date of the referral call to the statutory agency

Other services that can offer help and advice:

- Careline. Telephone counselling service for children, young people and adults on any issue, including relationships, depression, mental health, abuse, addictions, stress etc. www.carelineuk.org T **08451 228622**
- Disability Information Service. National service providing information on all aspects of disability for disabled people, their families, friends and carers. www.diss.org.uk
- Mencap. Charity working with people with a learning disability and their families and carers. www.mencap.org.uk T **0808 808 1111**
- Mental Health Foundation. Information about how to get help with any mental health problem in your local area. www.mentalhealth.org.uk
- Mind. A wealth of information about mental health issues and contact details for the nearest Mind group in your area. www.mind.org.uk T **0845 766 0163**
- Ann Craft Trust. Offer advice on issues relating to children and adults with learning disabilities. www.anncrafttrust.org T **0115 951 5400**

3.5 Allegations of previous Abuse

Allegations of Abuse are occasionally made some time after the event, for example by an adult abused as a young person by a member of staff who is still working with Children or Vulnerable Adults.

Where such an allegation is made, you should follow the procedures given above relating to the involvement of statutory agencies. This is because other Vulnerable Adults, either within sport or in other environments, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to Abuse should automatically be excluded from working with vulnerable groups.

3.6 Support to deal with the aftermath of Abuse

Consideration should be given to the kind of support that Vulnerable Adults and members of staff may need in the aftermath of an Abuse case. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling Directory is available from The British Association for Counselling, 1 Regent Place, Rugby CV21 2PJ, Tel: 01788 550899, Fax: 01788 562189, E-mail: bac@bacp.co.uk, Internet: <http://www.bacp.co.uk>.

Consideration should be given to what kind of support may be appropriate for the alleged perpetrator. Whilst the investigation is on-going the alleged perpetrator should be given the detail of the process to be followed and should have a point of contact within the organisation. They can also be directed towards The British Association for Counselling Directory (details above) or The Samaritans who provide, non-religious, non-political, 24-hour confidential support line: 08457 90 9090 www.samaritans.org.uk

4. Designated persons with responsibility for safeguarding Vulnerable Adults

4.1 Lead Safeguarding Officer (LSO)

This should be someone with good knowledge and understanding of the issues that vulnerable adults face in the sporting environment and a focussed approach to addressing concerns, raising awareness and improving practice. The post holder must be able to communicate effectively to provide advice and support at all levels. They should have influencing skills and an ability to work with conflict and with emotionally distressing matters. Knowledge of relevant legislation, government guidance, the BPA *Safeguarding and Protecting Vulnerable Adults/Children Policies* and procedures is essential. The ability to confront poor and discriminatory practice and also to promote and demonstrate high standards of anti-discriminatory practice in relation to safeguarding and abuse.

4.1.1 Responsibilities

The LSO has overall responsibility for the development and establishment of the BPA's approach to safeguarding Children and Vulnerable Adults.

4.1.2 Role related to SPVA Policy

- To liaise with the specialists and investigators who may be brought in to help with vulnerable adult cases regarding individual cases, proposed policy and guidance.
- To convene and chair the case management group as required. To convene and chair the Safeguarding Group meetings at least once a year. To take a lead role in maintaining and reviewing implementation of the BPA's *Safeguarding Vulnerable Adults Policy*.
- To coordinate the dissemination of this policy, procedures and related resources throughout BPA.
- To represent the BPA at external meetings related to safeguarding.
- To receive reports of referrals and investigations from the DSO or investigators on behalf of the BPA and convene meetings of the case management group as necessary.
- To keep up to date with own knowledge and skills.

The LSO should undergo the vetting procedure outlined in section 7.

4.2 Designated Safeguarding Officer (DSO)

4.2.1 Responsibilities

The DSO is responsible for co-ordinating action at an event on receipt of any concerns or referrals. The DSO should endeavour to gain an

understanding of BPA's *Safeguarding & Protecting Vulnerable Adults Policy* and have an appropriate level of training. It is essential that the DSO understands and can act in line with the Welfare Plan for the event.

4.2.2 Role related to SPVA policy

- To provide information and advice regarding the safeguarding of Vulnerable Adults at the event or camp
- To promote the safeguarding policies at the event
- To receive information from staff, volunteers, vulnerable adults, parents, Carers or Advocates who have protection concerns regarding Vulnerable Adults and record it.
- To assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- To report referrals or concerns to the LSO as soon as possible in line with BPA procedures.
- To report concerns where appropriate to the police in consultation with the individual or their Carer.
- To ensure that adequate information is available at the time of referral and that the referral is confirmed in writing, under confidential cover, where possible using the BPA Incident Report Form.
- To promote an equal opportunities approach at the event and within the team, by maintaining anti-discriminatory practice standards, acknowledging that discrimination exists, actively addressing instances in line with BPA policy and procedure

The DSO should undergo the vetting procedure outlined in section 7.

4.3 Safeguarding Group

The BPA will appoint a Safeguarding Group who will advise the BPA on all matters relating to Safeguarding strategy. The Safeguarding Group will be chaired by the LSO and will comprise at least three other members of staff with appropriate training and/or responsibility for athlete and team welfare.

Responsibilities will include:

- Ensure safeguarding policies reflect legislation and government guidance
- To review the implementation of the policy
- To review, annually, reported concerns and make recommendations relating to safeguarding policy

5. Recruiting and Selecting People to work with Vulnerable Adults

BPA will ensure that all reasonable steps are taken to prevent unsuitable people from working with vulnerable adults.

BPA will ensure effective recruitment and selection for core staff and will follow these steps:

1. Advertise all posts via appropriate outlets
A job ad should be designed to attract the best people, but also deter anyone who might present a risk to vulnerable adults' safety. It should describe what the role entails and the sort of person you are looking for. If a Disclosure and Barring Service check is required, this should be stated.
2. In every job ad, give a clear role description, explaining the full range of duties the job will involve. Also include a person specification that describes the skills and attributes the post-holder must have.
3. Shortlist the most suitable applicants and interview them accordingly.
In order to develop a shortlist, particularly paid roles, applications should be scored against the specifications of the role. Interview questions should relate to these specifications and be used to establish whether the candidate:
Understands the needs of the vulnerable adults
Understands the boundaries when working with vulnerable adults
Considers the views and perspectives of vulnerable adults and parents/carers
4. Obtain references, identification and originals of any necessary qualifications from candidates
5. Ask Applicants to complete a self-disclosure form declaring any convictions or cautions, including all spent or unspent convictions.
6. Carry out Disclosure and Barring Service checks, or other vetting procedures where appropriate
7. Provide a thorough induction for new staff to ensure they are familiar with responsibilities of the post. The induction process should include their signing up to the codes of conduct.
8. Appoint staff for an initial probationary/trial period, with a review before they are confirmed in the post

Those working and selected as part of ParalympicsGB for the Paralympic Games, signing a Team Members Agreement or Associate Team Members Agreement, who are employed by a NGB or other partner will be assessed for suitability by that employer or partner. The BPA will ask for the NGB or partner to provide a statement for suitability and proof of vetting and

barring where appropriate and may ask for evidence that an appropriate recruiting procedure has been followed.

Those working and selected to work with BPA on other events (e.g. Paralympic Inspiration Programme), who are employed by a NGB or other partner will be assessed for suitability by that employer or partner. The BPA will ask for the NGB or partner to provide a statement for suitability and proof of vetting and barring where appropriate and may ask for evidence that an appropriate recruiting procedure has been followed.

This applies to anyone whether voluntary or paid positions who are working with vulnerable adults. The steps that should be taken are the same for volunteers or employees.

The BPA's recruitment and selection procedures are based on the *Safeguarding Vulnerable Groups Act 2006* and may be revised from time to time.

5.1 Controlling access to Vulnerable Adults

All individuals who will have significant access to Vulnerable Adults must first be vetted to establish whether they have any criminal convictions or other past behaviour that suggests they are unsuitable to work with vulnerable adults or may present a risk to them. This applies equally to paid staff and volunteers.

All volunteers and paid staff working in a role that entails Significant Access to Vulnerable Adults, or where they have a Position of Trust, or existing volunteers or staff who change their role to work with these vulnerable groups, are required to complete the following vetting process:

- All volunteers/staff should complete an application form. The application form will help to assess an applicant's suitability to work with Vulnerable Adults based on their skills and competencies as well as eliciting information about an applicant's past and providing a self disclosure about any criminal record.
- provide two appropriate referees
- provide details of previous volunteering experience or relevant employment.
- provide evidence of their identity (such as a driving licence or passport with photo)

In addition those working in a Regulated Activity must also comply with legal requirements of the *Safeguarding Vulnerable Groups Act 2006*, as these are implemented:

- That is, for anyone working in a 'Regulated Activity' they must

complete an Enhanced CRB Disclosure check

**For more information on criminal records checks please go to
Appendix Three**

6. Awareness and training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is not likely to result in allegations being made.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible Abuse.
- Respond to concerns expressed by a Vulnerable Adult.
- Work safely and effectively with Vulnerable Adults.

BPA requires:

- Coaching staff to attend a recognised 3-hour Safeguarding workshop, to ensure they have an understanding of what is considered to be good practice and to facilitate the development of a positive culture towards safeguarding.
- Relevant personnel to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behaviour of an adult, or a child, towards a child or vulnerable adult.
- Attend updated training when necessary. Information about meeting training needs can be obtained from sportscoach UK (<http://www.sportscoachuk.org>), the National Society for the Prevention of Cruelty to Children (www.nspcc.org.uk), and the Home Country Sport Councils.
- Designated Safeguarding Officers – should attend CPSU Time to Listen Training or equivalent.

7. Complaints and disciplinary procedures

The BPA has its own Complaints and Disciplinary procedure for dealing with breaches of the *Safeguarding & Protecting Vulnerable Adults Policy* and procedures.

- If the Abuse is alleged to have been committed in the course of a person's employment, he or she will be subject to whatever disciplinary procedures and sanctions are stated in their employment contract. The BPA may decide to await the outcome of such procedures before starting its own investigation.
- If a case is being investigated by a statutory agency, the BPA may suspend / de-select the individual concerned whilst this investigation is taking place. This is a neutral act and is not intended to prejudge the outcome of the investigation, but simply to remove the individual from contact with Vulnerable Adults until the investigation is concluded. Once the statutory agency's investigation is completed, and irrespective of its findings, the BPA will assess the case following its own disciplinary procedures.
- Irrespective of the findings of any social services or police inquiries, the *case management group* will assess all individual cases to decide whether a member of staff, volunteer or athlete can be reinstated and how this can be sensitively handled. This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, the *LSO and/or DSO* must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of Vulnerable Adults must remain of paramount importance throughout.
- If the alleged perpetrator is a member of a NGB then BPA fully expects that NGB to enact its own procedures for dealing with accusations of abuse, bullying and poor practice. At all stages of this process BPA should be kept informed of the status of the investigation and the NGB's actions.
- BPA has a statutory responsibility to make a referral to the ISA where there have been allegations made against a member of staff or volunteer that have resulted in them being removed, or having resigned themselves, from their duties.
- Every effort will be made to maintain confidentiality for all concerned, and consideration will be given to what support may be appropriate to Vulnerable Adults, Carers, members of staff and

volunteers.

- It is not always possible to determine exact timescales for when cases will be resolved, however the BPA will always try to ensure that all parties know what procedure will be followed and what the expected time scales are. If there is a delay they will endeavour to inform all parties why there is a delay and when any development is expected. There should not be any period without communication of more than 28 days with involved persons. Ideally case management processes should not extend over more than three months, only in exceptional circumstances should they extend up to six months.

8 Implementation and monitoring procedures

The British Paralympic Association has established a Safeguarding Group to oversee the implementation of these procedures, to monitor their application in practice.

It is the Safeguarding Group's responsibility to check that:

- BPA's procedures continue to reflect the current recommendations of external agencies that specialise in child protection
- the procedures are disseminated and applied by the BPA's members and staff.

The Safeguarding Group will make an annual report to the BPA Board, through the LSO, on the progress of its activities in implementing and monitoring these procedures, and on the incidence and outcome of cases that have arisen in the year. The BPA may from time to time call upon external expert advice in auditing its procedures and improving its policies.

9 Appendix One

Poor practice

The following is regarded as being poor practice and should be avoided as far as is reasonable:

- unnecessarily spending excessive amounts of time alone with an individual Vulnerable Adult away from others
- engaging in rough, physical or sexually provocative games, including horseplay
- allowing or engaging in inappropriate touching of any form
- using language that might be regarded as inappropriate by the Vulnerable Adult, especially comments regarding disability which may be hurtful or disrespectful
- making sexually suggestive comments, even in fun
- reducing a Vulnerable Adult to tears as a form of control
- letting allegations made by a vulnerable adult go unchallenged, unrecorded or not acted upon
- doing things of a personal nature that a Vulnerable Adult can do for themselves
- taking a Vulnerable Adult alone on a car journey, however short inviting or taking Vulnerable Adults to your home or office where they will be alone with you
- sharing a room with a Vulnerable Adult

Note: at times it may be impractical to avoid some of these particular examples of poor practice. In this case, to protect both Vulnerable Adults and yourself, seek written consent from the Vulnerable Adult and, where appropriate, their Carer and ensure that the Designated Safeguarding Officer for the team or event is aware of the situation and gives their approval.

- If, during your care, you accidentally injure a Vulnerable Adult, they seem distressed in any manner, appear to be sexually aroused by your actions, or misunderstand/misinterpret something you have done, report these incidents as soon as possible to another adult in the organisation and make a brief written note of it. It may also be in the best interests of the Vulnerable Adult to discuss the matter with them openly and in a professional and sensitive manner that will avoid embarrassment; this is dependent on the individual and the circumstances.

Abuse

Abuse has many forms and can affect a Vulnerable Adult of any age or disability. The effects of such treatment can be degrading and damaging in the longer term and may follow an individual throughout their lives.

An individual who has been abused may exhibit a wide range of uncharacteristic behaviours some of which may manifest in the following ways:

- find it difficult or impossible to maintain a stable or trusting relationship
- become involved with drugs or prostitution
- increase alcohol consumption
- show angry or volatile behaviour without reason
- attempt suicide or self-harm
- go on to abuse another individual

Some of the reasons why Vulnerable Adults may be at increased risk of Abuse are as follows:

- stereotyping
- prejudice
- discrimination including ethnic or racial, sexual, disability orientated, etc.
- isolation low self image and low self esteem resulting in vulnerable self-presentation
- lack of knowledge about appropriate behaviours by others
- desire for acceptance , affection and attention
- powerlessness to protect themselves
- dependency upon others to care for them
- difficulty in communicating that abuse has occurred

Indicators of Abuse

Even for those experienced in working with the Abuse of Vulnerable Adults, it is not always possible to recognise potential abusive situations or situations where abuse is on-going. Personnel involved in the work of the BPA do not have responsibility for assessing and deciding situations where Abuse may be occurring. It is however the responsibility of everyone involved to be alert to the indicators of abuse and to act upon any concerns in line with BPA policy and procedures relating to the protection of Vulnerable Adults.

Indicators of Abuse may include one or more of the following:

- 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 an explanation seems inconsistent and improbable
- a disclosure made by a vulnerable individual describing what appears to be an abusive act involving him/her
- an expression of concern from a third party about the welfare of an individual
- unexplained changes in an individual's behaviour, such as loss of confidence, low self-esteem, becoming quiet and withdrawn, sudden outbursts of temper or uncharacteristic changes in behaviour: tearful , depressed, angry, watchful and frightened
- engaging in sexually explicit behaviour
- distrust of others, particularly those with whom a close relationship would normally be expected
- difficulty in making friends and socialising contrary to previous social behaviour
- being prevented from socialising with other individuals by a Carer or person in a position of authority
- displaying variations in eating patterns including overeating, loss of appetite or stealing and concealing food
- unexplained weight loss deterioration in personal hygiene and physical appearance
- refusal/reluctance to undress or change for sporting activities

Degree of abuse

In response to the *No Secrets* Government guidance, the Law Commission states that the severity and extent of Abuse should be evaluated based on the level of harm brought about by ill-treatment (not only physical ill-treatment) *"that leads to an impairment of, or avoidable deterioration in, physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development"*. In assessing the degree of Abuse, consideration should be paid to:

- the vulnerability of the victim
- the nature and extent of the Abuse
- the length of time the abuse has been occurring
- the impact on the individual
- the risk of repeated or increasingly serious acts involving this or other Vulnerable Adults.

Types of abuse

The Government guidance *No Secrets* provides the following as classifications of Abuse:

Neglect and acts of omission

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

In a sports environment this could include:

- a coach not keeping a vulnerable individual safe by exposing them to undue cold, heat or the unnecessary risk of injury e.g. allowing Athletes under their supervision to train or race inappropriately clothed for the prevailing conditions
- a parent, guardian or Carer consistently leaving a vulnerable individual without adequate provisions e.g. food, water, clothing, sun block where they are unable to provide themselves with these provisions

Physical abuse

"may involve hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions."

In a sports environment this could include:

- a coach disregarding the individual requirements of each vulnerable person's needs when setting a training programme e.g. allowing those who are limited by a physical impairment to undertake long, continuous or repetitious training that may lead to an injury or damage their health.

Sexual abuse

"Including rape and sexual assault or sexual acts to which the Vulnerable Adult has not consented, or could not consent, or was pressured into consenting."

In a sports environment indicators could include:

- a coach engaging in unnecessary and inappropriate physical contact e.g. massaging the shoulders of the athletes in a suggestive manner
- a coach making suggestive comments to their Athletes,

- an individual spending an unnecessary amount of time in the changing area where vulnerable individuals are present.

Psychological abuse

"Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks."

In a sports environment this could include:

- a Carer or coach subjecting an Athlete to constant criticism, shouting, name-calling, sarcasm, bullying or discriminatory behaviours or prejudicial attitudes
- a Carer or coach putting an Athlete under unrealistic pressure in order to perform to high expectations

Financial or material abuse

"Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits."

In a sports situation this could include:

- blackmailing an individual by requiring financial or material payment in return for certain benefits such as selection or complements
- charging vulnerable individuals more than the standard fee for participation in sports activities

Bullying

"Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves"

Bullying can be:

- **Emotional** being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting, (e.g. hiding kit or equipment, threatening gestures)
- **Physical** pushing, kicking, hitting, punching or any use of violence
- **Racist** racial taunts, graffiti, gestures
- **Sexual** unwanted physical contact or sexually abusive comments
- **Homophobic** because of, or focussing on the issue of sexuality
- **Verbal** name-calling, shouting, sarcasm, spreading rumours, teasing

Anti-Bullying Policy

The BPA is committed to fostering a caring, friendly and safe environment for everyone involved with Paralympic sport so they can participate in a relaxed and secure atmosphere. Bullying of any kind is unacceptable in sport. If bullying does occur, all Athletes, coaches, volunteers or Carers should be able to tell and know that incidents will be dealt with promptly and effectively.

Bullies come from all walks of life; they bully for a variety of reasons and may even have been bullied or abused themselves. Typically bullies can have low self-esteem, be excitable, aggressive or jealous.

Bullies can be boys or girls, men or women. Although bullying often takes place in schools and care homes, research shows it can and does occur anywhere where there is inadequate supervision—on the way to and from college, university or the sports club, at a sporting event or in the changing rooms.

Competitive sports are an ideal environment for the bully.

The bully in sport can be a:

- Parent or Carer who pushes too hard
- coach who adopts a “win at all costs” philosophy
- Athlete who intimidates or ridicules a peer
- sports official who places unfair pressure on a person
- spectator who constantly shouts abuse

Why is it Important to Respond to Bullying?

Bullying results in pain and distress to the victim. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Athletes and Personnel who are bullying need to learn different ways of behaving. Everyone involved with the BPA has a responsibility to respond promptly and effectively to issues of bullying.

Signs and Symptoms

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to all individuals, particularly vulnerable groups. An individual may indicate, by signs or behaviour, that he or she is being bullied. Coaches and those in staffing positions should be aware of these possible signs that they should investigate, especially where an individual:

- says they are being bullied
- is unwilling to go to club sessions
- becomes withdrawn, anxious, or lacking in confidence

- regularly feels ill before training sessions
- has clothes torn or possessions damaged
- has possessions go 'missing'
- asks for money,
- steals money or parts with their own money (to pay bully)
- has unexplained cuts, bruises or injuries
- is frightened to say what's wrong
- gives improbable excuses for any of the above

In more extreme cases:

- starts stammering cries themselves to sleep at night,
- has nightmares or demonstrates any other form of unusual behaviour during the evenings
- becomes aggressive,
- disruptive or unreasonable
- is bullying other individuals
- stops eating
- self harms
- attempts or threatens suicide or runs away

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated.

10 Appendix Two

Welfare planning for BPA events and camps

The following elements should be considered in forming a welfare plan:

Designated Safeguarding Officer(s)

At all events BPA will designate a member(s) of staff as the Designated Safeguarding Officer(s). The size and complexity of the event and the associated risks will be reflected the number of DSOs and the communication and reporting structure between them. Each DSO will undergo appropriate training to handle safeguarding concerns prior to their appointment. The roles and responsibilities of the DSO are set out in section 4.2.

At a Paralympic Games the Chef de Mission has ultimate authority for deciding what action should be taken on reported cases and is responsible for taking concerns forward to the statutory agencies if appropriate.

The ParalympicsGB safeguarding team will be clearly identified and communicated to all Athletes and support staff prior to their arrival and will be reinforced on arrival and during the course of their stay.

Team Agreement / Codes of Conduct

All members selected as part of ParalympicsGB for the Paralympic Summer/Winter Games as an associate team member or full member (athletes and support staff) are required to sign a Team Agreement outlining expected behaviour as well as broader aspects relating to participation at the Paralympic Games. Failure to behave in the appropriate manner as outlined in the Team Members Agreement can result in de-selection from the team.

For other events, BPA will have a Code of Conduct/event plans in place that all participants will be expected to adhere to, outlining the expected behaviours for different roles.

The Team Members Agreement covers areas around media, alcohol, drugs, sexual behaviour and anti-social behaviour. For further detail, please review the Code of Conduct and Team Members Agreement.

Changing rooms and facilities

- Where it is felt that supervision is necessary for vulnerable adults, this should be undertaken by two or more Personnel. All facilities should be fully accessible so that Athletes can, where they are able, change and shower independently.

- Adult coaches or volunteers should not shower or change at the same time as the vulnerable individuals they have been working with.
- No staff or volunteers, medical or otherwise should be present when Athletes of the opposite sex are showering or changing (for example a male coach working with a female crew)
- Separate changing facilities should be available. If a vulnerable individual is uncomfortable showering or changing in public, no pressure should be put on them to do so; they should be encouraged to change and shower at home
- Vulnerable Adults and, where appropriate, their Carers should be involved in deciding how best they can be assisted. Always ensure the Vulnerable Adult consents to the assistance that is offered
- No photographic equipment should be used in the changing room environment. This includes cameras, video cameras, camera phones etc.

Coaching and staff ratios

Although there is Government guidance for people working with vulnerable adults such as that found in the *No Secrets* guidance, it is essential that a separate risk assessment is undertaken for each group of Vulnerable Adults and that this is reviewed for each training session. Participants who require care or support from other adults for whatever reason, even those qualified as coaches, should be supervised at all times.

In line with the national guidance the level of supervision should take account of the:

- disability and level of physical and mental ability of each individual
- extent of dependency of the vulnerable individual on Carers
- type of training session being undertaken
- individual's scope for developing independence
- environment that the session is taking place in
- risk assessment

If there is an accident or incident you should ensure there is always someone available to supervise any other Vulnerable Adults; coaches should ensure they never work in isolation.

Transport

If transporting Vulnerable Adults as part of an event or camp points to consider include vehicle type (public transport, minibus, coach or private

car), accessibility, length of journey, competence of driver, journey time, distance, stopping points, supervision during journey and legislation regarding seat belts.

Emergency Procedures

The team leader or coach should know how to contact emergency services and have access to at least a basic First Aid box. Those in charge of Vulnerable Adults have a duty to ensure that they are kept safe and healthy and should not hesitate to act in an emergency and to take life saving action in an extreme situation. The plan and Risk Assessment should ensure there are sufficient and accessible escape routes for the number of wheelchair users and those with other types of impairments that might restrict their mobility.

Photography

The use of photography and film is an excellent way of capturing sporting moments for use in the promotion of the sport and/or to celebrate individual success. There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of Athletes with a disability in vulnerable positions. With this in mind BPA will only use appropriate imagery of its Athletes on its website and in its promotional documents. Consent to use this imagery will always be sought.

All staff should be vigilant and any concerns over the misuse of photography or images of BPA athletes should be reported to a DSO or the LSO.

Videoing as a coaching aid: there is no intention to prevent coaches using video equipment as a legitimate coaching aid. However, Athletes and their Carers should be made aware that this is part of the coaching programme, their consent obtained, and such films should be stored safely.

Missing People

If any person is suspected of being missing, the flow chart in Appendix 2 must be followed.

Case management group

At major events it may be appropriate to form a case management group to provide support for the DSO or LSO and to help investigate or manage any cases or referrals.

This group must work within the policies and procedures of BPA to ensure that all decisions relating to safeguarding Vulnerable Adults are reached following a fair, open and transparent process. The group will comprise of the LSO and two other suitably qualified persons. It may call upon whatever professional input is required on an advisory capacity for each case.

Responsibilities

- To recommend, where appropriate, that a person is referred to ISA in accordance with *Safeguarding Vulnerable Groups Act 2006*.
- To recommend to the appropriate member of BPA's senior management team where appropriate, that a person is temporarily suspended or banned from some or all activities at the event

Role

- To support the LSO to make decisions on the initial approach to all reported cases related to the welfare and protection of Vulnerable Adults. That is, to the 'route' a case will take either internally or via external referral to statutory agencies.

11 Appendix Three

Criminal Records Checks

All individuals who will have significant access to Vulnerable Adults must first be vetted to establish whether they have any criminal convictions or other past behaviour that suggests they are unsuitable to work with Vulnerable Adults or may present a risk to Vulnerable Adults. This applies equally to paid staff and volunteers.

All volunteers and employees working in a role that involves Significant Access to Vulnerable Adults, or where they hold a Position of Trust, or existing volunteers or employees who change their role to work with Vulnerable Adults, are required to complete the following vetting process:

- All volunteers/staff should complete an application form. The application form will help to assess an applicant's suitability to work with Vulnerable Adults based on their skills and competencies as well as eliciting information about an applicant's past and providing a self-disclosure about any matter that might influence their suitability to work with Vulnerable Adults.
- provide two appropriate referees
- provide details of previous volunteering experience or relevant employment.
- provide evidence of their identity (such as a driving licence or passport with photo)

In addition those working in a Regulated Activity must also comply with legal requirements of the *Safeguarding Vulnerable Groups Act 2006*, as these are implemented:

- That is, for anyone working in a 'Regulated Activity' they must complete an appropriate criminal records check. All of which must be at an Enhanced level,

The self-declaration form requires prospective volunteers and employees to declare any criminal records they may have, even if these are considered 'spent', or any disciplinary investigations by any organisation including employers, the police or social services that relate to inappropriate behaviour towards a child or vulnerable adult.

The recruiting officer should make it clear that a failure to disclose relevant information will result in disciplinary action and possible dismissal or exclusion. It should also be made clear that having a criminal record is not necessarily a barrier to working in sport. Individuals being asked to complete a self declaration and a Disclosure application should be made

aware of BPA's policy on the recruitment of ex-offenders.

Disclosure information for core staff will be assessed by the BPA LSO and an appropriately qualified BPA Officer in line with BPA's policy on the recruitment of ex-offenders and the CRB (or equivalent agency's) Code of Practice (available on website). Completing a criminal records Disclosure form is a confidential and sensitive matter for some people and care should be taken to explain how the information contained on the certificate will be treated.

Disclosure certificates must be renewed at least every three years if a person remains in post or more regularly if, for example, there is a concern raised, if the person changes their role or moves to a new role, or if the person has been absent from the BPA for a significant period.

Those working as part of the PGB Team and who are employed by a NGB or other partner will be assessed for suitability by that employer or partner. The BPA will ask the NGB to provide a statement of their suitability and may ask for evidence that an appropriate recruiting procedure has been followed.

Note: Completing the above process does not guarantee that an individual is safe to work with Vulnerable Adults. The BPA will use information from the Disclosure certificate and any additional information from the Disclosure agency as part of an overall recruitment and selection process to assess any potential risk. The Line Manager will also assess for the individual's suitability by taking up references, interviewing and supervision.

Disclosures should be renewed every three years if the individual remains in post, or more regularly if, for example, there is concern raised, if the person changes their role significantly or moves club frequently, or if the person has been absent for a significant period.

Who should be checked for their criminal records history?

- medical staff
- sport science staff,
- DSOs,
- coaches of junior athletes
- those with sole access to Children
- overnight staff supporting Children

It is not enough to meet the Disclosure Agency eligibility criteria, to state that an individual may come into contact with Children or Vulnerable Adults. Eligibility to apply for a Disclosure check depends on the specific role a person will perform whilst conducting their duties within an

organisation. A risk assessment should be undertaken to assess the role and duties they are expected to fulfil whilst carrying out their role and Disclosure applications should be made accordingly.

The following roles should only have their criminal records history checked if their role falls under the category of 'Regulated Activity' as defined by the *Safeguarding Vulnerable Groups Act 2006*,

- caterers,
- cleaning staff,
- sports officials

Information about the different Disclosure services in England, Wales, Scotland and Northern Ireland is available from:

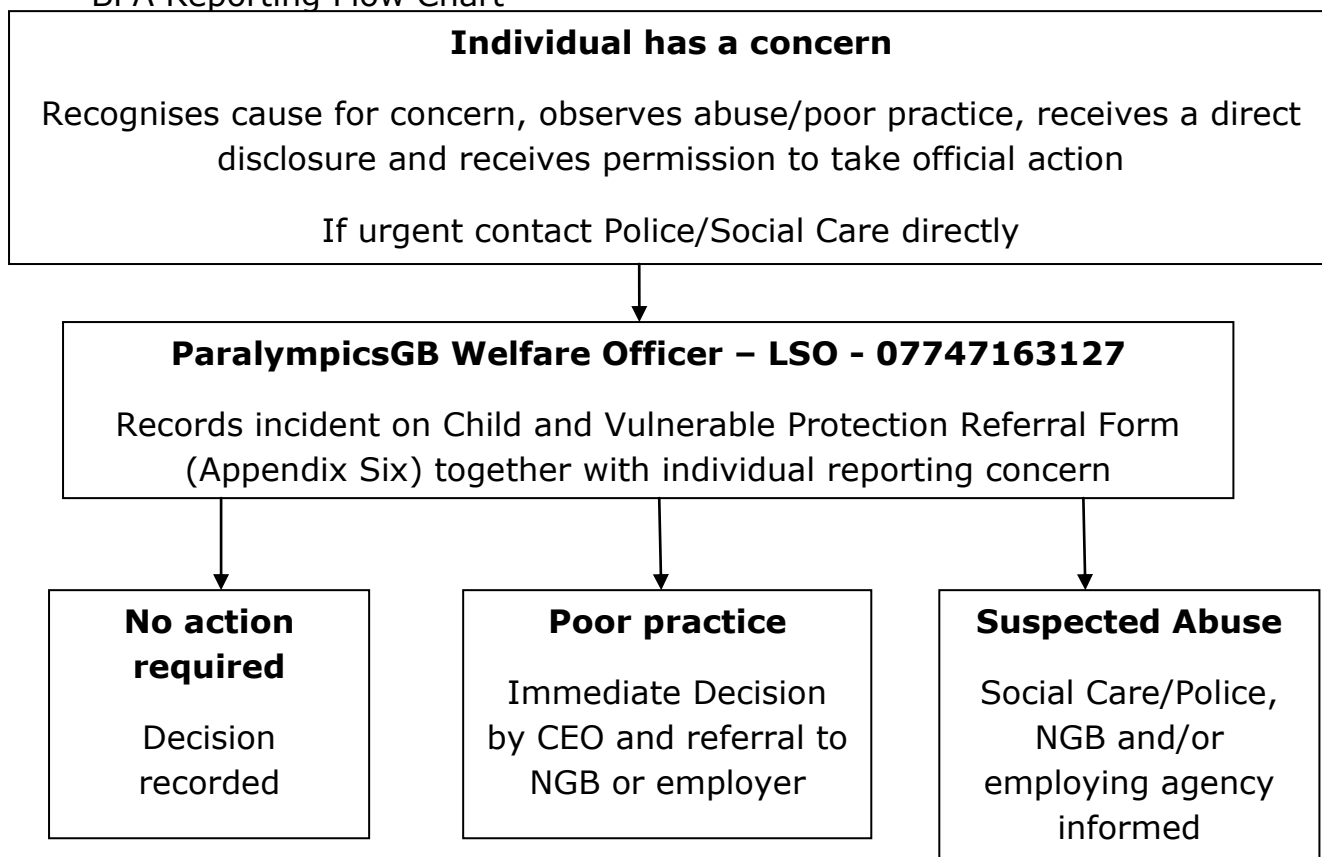
England and Wales: www.direct.gov.uk/crb

Scotland: www.disclosurescotland.co.uk

Northern Ireland: www.nidirect.gov.uk/criminal-record-checks-an-introduction

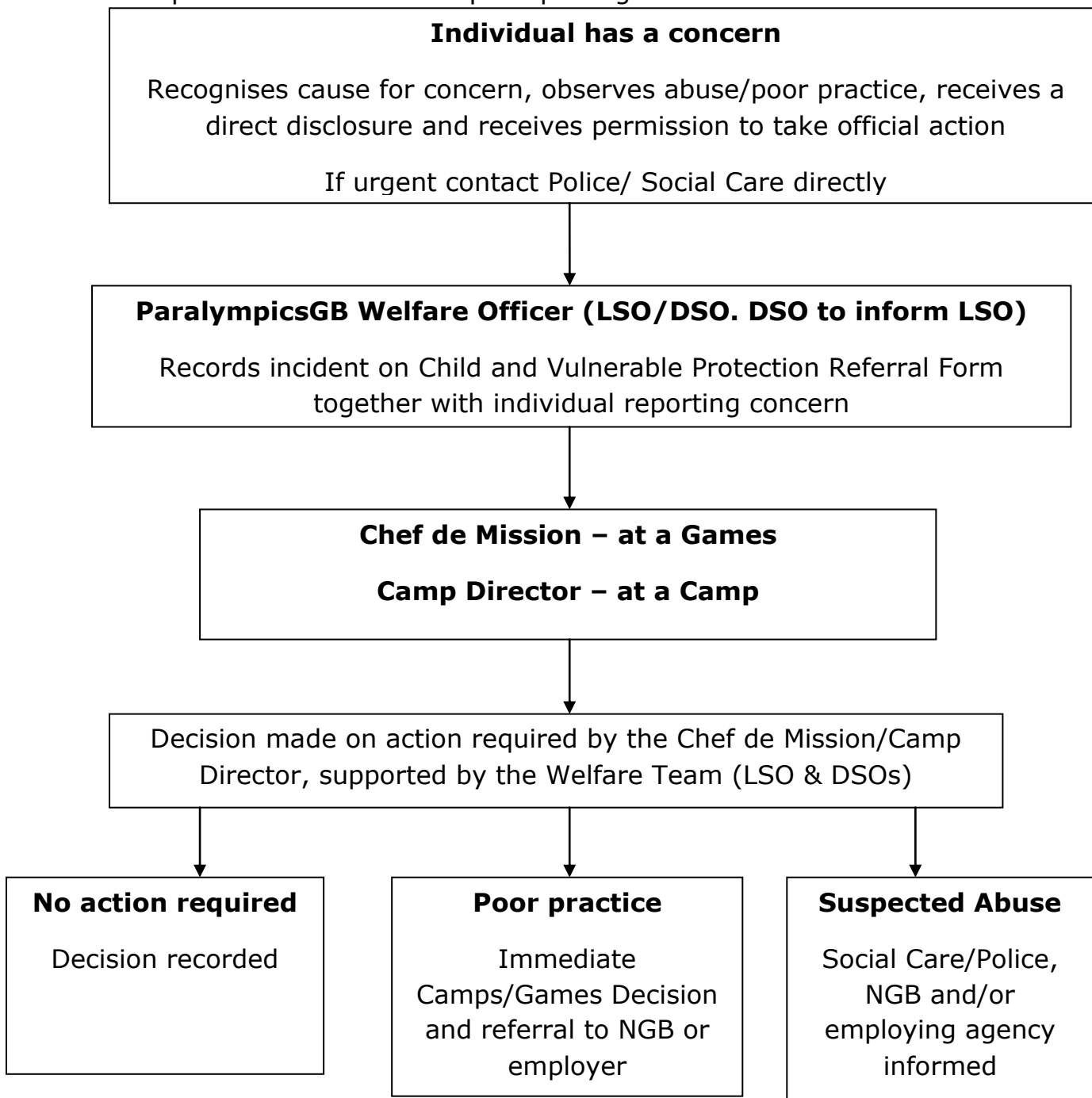
12 Appendix Four

BPA Reporting Flow Chart



13 Appendix Five

Template for Games & Camps Reporting Flow chart



14 Appendix Six

Vulnerable Adult Protection Incident Report Form

Your name:	Your position:
Your address:	Your phone number/s:
Child's name:	Child's address:
Date of birth:	
Parents/carers names and address:	
Date and time of any incident:	
Your observations:	

Exactly what the child said and what you said:

Action taken so far:

Alleged / suspected abusers':

Name:

Address:

External agencies contacted (date & time)

Police

yes/no

If yes – which:

Name and contact number:

Details of advice received:

<p>Social services</p> <p>yes/ no</p>	<p>If yes – which:</p> <p>Name and contact number:</p> <p>Details of advice received:</p>
<p>NGB</p> <p>yes/no</p>	<p>Name and contact number:</p> <p>Details of advice received:</p>
<p>Local authority</p> <p>yes/no</p>	<p>If yes – which:</p> <p>Name and contact number:</p> <p>Details of advice received:</p>
<p>Other</p> <p>(e.g. NSPCC)</p>	<p>Which:</p> <p>Name and contact number:</p> <p>Details of advice received:</p>

Signature:	Print name:
Date:	

NB This form should be received by the LSO who will forward it to social services within 24 hrs –immediately after completing the form, telephone the Lead Safeguarding Officer to report the incident.