

Safeguarding Policy

1. Introduction

- 1.1 The government published **Working Together to Safeguard Children** in July 2018. This guide promotes inter-agencies 'Working Together' and sets out the responsibilities of all professional agencies to safeguard children from harm and protect them from abuse. All practitioners (all Brio staff) who work with children and families should be familiar with the requirements of the legislation.
- 1.2 Brio's policy and procedures have been developed in line with this guidance and is based on a robust application of the framework and is underpinned by the Children's Act 1989 and 2004. It should be read and used in conjunction with other relevant guidance including specific national governing body's guidance, along with multi-agency policies and procedures.
- 1.3 Working Together 2018 seeks to ensure that all organisations working with children have effective safeguarding systems in place and sets out principles that should underpin all safeguarding arrangements.
- 1.4 Whilst the guide refers specifically to children, Brio Leisure recognises that vulnerable adults must also be protected, and the information and procedures outlined refers to both **Children** and **Vulnerable Adults**.
- 1.5 A vulnerable adult is deemed to be as a person aged 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.
- 1.6 Sport, and physical recreation are a key part in the development of the physical, social and personal skills of children and young people. The majority of a child's or young person's physical activity relies heavily on adult involvement.
- 1.7 Any adult working in the provision of physical activity for young people, in either a paid or voluntary capacity, is legally bound to provide a safe and caring environment, free from risk or potential risk of harm. Children must be protected from maltreatment and impairment of their health and development to ensure they grow up in circumstances consistent with the provision of safe and effective care.

- 1.8 Brio Leisure accepts and acknowledges their legal and moral responsibility to provide a duty of care to children/young adults and vulnerable adults, to safeguard their welfare and protect them from harm.
- 1.9 All forms of discrimination and abuse are treated equally, regardless of age, gender, race, culture, religion, language, sexual orientation or ability.
- 1.10 This policy and outlined procedure are relevant for all Brio Safeguarding Officers but all Brio staff are required abide by the code of best practice for reporting safeguarding concerns.

2. Safeguarding: Everyone's Responsibility

- 2.1 Everyone who comes into contact with children and families has a role to play in identifying concerns, sharing information and taking prompt action. All professionals need to share information appropriately, in a timely way, and with primary regard to the interests of the child or young person. This includes making sure that all agencies contribute to delivering whatever actions are needed to safeguard and promote a child's welfare.
- 2.2 The purpose of this document is to outline the process for Brio employees to report and respond to concern that a child or young person may be subject to abuse. It outlines the actions they should take, as a minimum, if they suspect that a child or young person is at risk of harm. Additionally, how to report concerns or information about the suitability of a colleague or adult who is in a position whereby they could cause harm to a child or young person.
- 2.3 Brio have designated Safeguarding Officers who are responsible for making the referral, and following:
 - a. **Process A** if the concern is about the safety and wellbeing of a child or young person;
 - b. **Process B** if the concern is about the conduct of an employee, volunteer of adult;
 - c. **Process C** if the concern is about the safety and wellbeing of a vulnerable adult.

3. Good Practice amongst Employees and Volunteers

3.1 This framework is to promote good practice amongst employees and volunteers by:

- Promoting the general welfare, health and safety of children and young person during any organised activity within Brio;
- Ensuring that all employees who come into contact with children and young persons are alert to their needs and any risks or potential risks of harm;
- Making the child or young person's needs paramount, so that every child or young person receives the support they need before a problem escalates;
- Enabling Brio employees, coaches, volunteers and parents to recognise potential signs of abuse;
- Providing clear procedures for Brio employees, coaches, volunteers, parents and young people to raise and report any concerns;
- Raising the awareness of Brio employees, coaches, volunteers, parents and young people about safeguarding issues;
- Ensuring that all employees, coaches, volunteers are appropriately recruited, vetted, trained and supervised.

3.2 **Employee/Volunteer Responsibilities:**

- To work safely to safeguard children, young people and vulnerable adults;
- To undertake regular safeguarding training;
- To be familiar with current documentation;
- To know the correct recording/reporting procedures if you have concerns about anything you have seen or heard;
- To understand that children, young people and vulnerable adults need to be listened to, taken seriously, and have their concerns acted upon;
- To be aware that abuse could be perpetrated by colleagues;
- To use communication systems provided to record, report and request support;

- If you are in doubt about a child being potentially at risk, first consult with your line manager or a Brio Safeguarding Officer.

3.3 Safeguarding Officer Responsibilities:

The role of a Safeguarding Officer who is designated an appointed person is to:

- Receive information from employees, volunteers, children or parents and carers who have safeguarding concerns;
- Assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate;
- Consult initially with their line manager or other safeguarding officer to test out any doubts or uncertainty about the concerns;
- To contact the child's or young person's parent or guardian to help evaluate the concerns;
- When required to make a formal referral to a statutory safeguarding authority, Integrated Access and Referral Team (iArt) or Emergency Duty Team (EDT) or the Police;
- To report the incident to the Brio Safeguarding Lead as soon as practically possible and to complete and obtain all required documentation and forms;
- It is not the Safeguarding Lead or Safeguarding Officer's role to decide whether a child, young person or vulnerable adult, has been abused or not.

3.4 Brio Safeguarding Contacts

The Safeguarding Lead for Brio Leisure is:

- **People Director** : Jess Arkley

The Safeguarding Officers for Brio Leisure are:

- **Human Resources Advisor:** Christine Dodd
Leanne Rutter
- **Facility Managers:** Jon Kelly
Julie Kirkham

Lesley Finnigan
Phil Harding
Paul Hesketh
Mark Swaffield
Peter Davies

- **Duty Managers:** All
- **Aquatics Leads:** All
- **Gym Leads** All
- **Aquatic & Fitness Officer:** Bev Pentland
- **Community Development Director:** Jess Jeffreys

3.5 Confidentiality

It is important that all staff and volunteers involved in a case maintain confidentiality throughout the disclosure, potential investigation and with the relevant documentation gathering. Any such breach in confidentiality could be damaging both to the child and to the investigation and is a potential serious breach of data protection legislation.

Effective sharing of information between Safeguarding Officers, local organisations and agencies is essential to keep children safe. The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows information to be shared without gaining consent.

4. A step-by-step guide

4.1 The process for Brio employees to report and respond to concerns that a child or young person may be subject to abuse is outlined. It outlines the actions they should take, as a minimum, if they suspect that a child or young person is at risk of harm. Additionally, how to report concerns or information about the suitability of a colleague or adult who is in a position whereby they could cause harm to a child or young person.

4.2 If the concern is about the safety and wellbeing of a child or young person **Process A** – see below.

4.3 If the concern is about the safety and wellbeing of a vulnerable adult **Process B** - see below.

4.4 If the concern is the about the conduct of an employee, volunteer or adult
Process C – see below.

4.4 **Process A - A child or young person is at risk of harm**

a. Step 1: Identifying cases

Any child or young person may find himself or herself in a situation which puts them at risk of harm. This list is not exhaustive. It is not the responsibility of those working with children and young people to decide that child abuse has occurred, **but it is their responsibility to act on any concerns.**

b. Step 2: Referring cases

Where staff or volunteers suspect that a child or young person is at risk or has concerns for a child's or young person's safety, they should discuss their concerns with their line manager or a Brio Safeguarding Officer immediately.

- The Brio Safeguarding Officer will make contact with the parent, guardian or supervising adult;
- They will raise their concerns in the form of an enquiry and listen to the parent guardian or supervising adult reply carefully and make an assessment;
- If a Safeguarding Officer still has concerns about the child or young person's welfare or safety, they will inform the parent, guardian or supervising adult that they will report the concern, initially to the Brio Safeguarding Lead and if required to the LSCB (Local Safeguarding Children's Board);
- The Brio Safeguarding Officer will then contact immediately the Safeguarding Lead or another Safeguarding Officer/their line manager to share their concern, seek advice to obtain consensus that the concern should be reported. If no other designated Brio Safeguarding Officer is available the initial Safeguarding Officer will make the decision in isolation;
- If after discussion concerns remain, the LSCB Pan-Cheshire Multi-Agency Safeguarding Children Procedures should be followed. The parent, guardian or supervising adult will be informed that the concern has now been passed to the LSCB;

- Where there is an imminent risk to a child or young person there should be no delay in taking action to safeguard. Where the threat is immediate it may be appropriate to inform Cheshire Police on telephone number 0845 458 0000 / 01244 350000 / 101 or if necessary through the emergency number 999;
- If the concern meets the criteria for a referral, initial advice and guidance should be sought from the Integrated Access and Referral Team (iArt), contact number 0300 123 7047 or the Emergency Duty Team (EDT), outside normal hours contact number 01244 977277;
- If a referral is to be made to the LSCB it is made to the iArt using the Multi Agency Referral Form (MARF) *online form*:
<https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/children-and-young-people/report-a-concern-about-a-child/making-a-referral.aspx>.

The Brio safeguarding report form must be completed along with the gathering of any statements, relevant documentation and should then be sent immediately to the Safeguarding Lead and the Business Development and Operations Manager.

c. Step 3: Assessment

When the referral MARF is received by iArt they will undertake further enquiries. iArt will decide whether the threshold is met to progress the referral either to Children's Social Care for a statutory Social Work assessment or to Early Help and Prevention, or whether the threshold has not been met for the referral to progress and provide other information/advice/guidance.

d. Step 4: Multi Agency meeting

The Brio Safeguarding Lead will then be responsible for the external multi-agency process and attendance at strategy meetings.

4.5 Process B - A vulnerable adult is at risk of harm

This process is very similar to process A.

a. Step 1: Identify cases

Any vulnerable adult may find himself or herself in a situation which puts them at risk of harm. This list is not exhaustive. It is not the responsibility of those working

with the vulnerable adult to decide that abuse/ neglect has occurred, **but it is their responsibility to act on any concerns.**

b. Step 2: Referring cases

Where staff or volunteers suspect a vulnerable adult is at risk or has concerns for their safety, they should discuss their concerns with their line manager or a Brio Safeguarding Officer immediately.

- The Brio Safeguarding Officer will make contact with the carer, guardian or supervising adult;
- They will raise their concerns in the form of an enquiry and listen to the carer, guardian or supervising adult reply carefully and make an assessment;
- If a Safeguarding Officer still has concerns about the vulnerable adults safety, they will inform the carer, guardian or supervising adult that they will report the concern, initially to the Brio Safeguarding Lead and if required to the Local Safeguarding Adults Board (LSAB).
- The Brio Safeguarding Officer will then contact immediately the Safeguarding Lead or another Safeguarding Officer/their line manager to share their concern, seek advice to obtain consensus that the concern should be reported. If no other designated Brio Safeguarding Officer is available the initial Safeguarding Officer will make the decision in isolation;
- If after discussion concerns remain, the LSAB Pan-Cheshire Multi-Agency Safeguarding Adult Procedures should be followed. The carer, guardian or supervising adult will be informed that the concern has now been passed to the LSAB;
- Where there is an imminent risk to the vulnerable adult there should be no delay in taking action to safeguard. Where the threat is immediate it may be appropriate to inform Cheshire Police on telephone number 0845 458 0000 / 01244 350000 / 101 or if necessary through the emergency number 999;
- If the concern meets the criteria for a referral, initial advice and guidance should be sought from the LSAB contact number 0300 123 7034 or the Emergency Duty Team (EDT), outside normal hours contact number 01244 977277;
- If a referral is to be made to the LSAB it is made via their email contact details: accesswest@cheshirewestandchester.gov.uk.

The Brio safeguarding report form must be completed along with the gathering of any statements, relevant documentation and should then be sent immediately to the Safeguarding Lead and the Business Development and Operations Manager.

4.5 Forms of Abuse

Forms of abuse can be:

- **Neglect:** Where adults fail to meet the young person's basic needs like food or warm clothing, or fail to refuse to give young people love, affection and attention. Young people might also be constantly left alone or unsupervised. Neglect in a sporting situation could conclude a helper not ensuring that young people were safe, exposing them to undue heat or cold, or to unnecessary risk of injury.
- **Bullying:** Bullying may be seen as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. Anyone can be the target of bullying, victims are often shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reason – being overweight, physically small, having a disability or belonging to a different race, faith or culture.
- **Physical:** Where adults physically hurt or injure young people by hitting, shaking, squeezing, burning or biting, or by giving young people alcohol, inappropriate drugs or poisonous substances. In sports situations, physical abuse might occur when the nature and intensity of training exceeds the capacity of the immature and growing body of a child or young person.
- **Sexual:** Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur using technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or

young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

- **Emotional:** Persistent lack of love and affection, where a child may be constantly shouted at, threatened or taunted and made to become very nervous and withdrawn would constitute emotional abuse. Emotional abuse could also occur when there is neglect, physical or sexual abuse. Emotional abuse might be constant criticism, bullying or unrealistic pressure to perform to high expectations.

4.6 Indications of Abuse

Some indications that a child has been abused may include:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries;
- An injury for which the explanation seems inconsistent;
- The child describes what appears to be an abusive act involving him/her;
- Having bruising on a regular basis or extreme bruising and the child cannot explain how they got the bruising;
- Someone else (a child or adult) expressing concern about the welfare the child;
- Chronic fatigue;
- Bites;
- Sudden drop in performance;
- Changes to attendance patterns;
- Unexplained changes in behaviour over time e.g. becoming very quiet, withdrawn or displaying sudden bursts of temper;
- Physical aggression towards parents, siblings, pets, teachers or peers;
- Low self-esteem;
- Engaging in explicit sexual behaviour;
- Detachment from age appropriate activities;
- Distrust of adults, particularly those with whom a close relationship would normally be expected;
- An apparent difficulty in making friends;
- The prevention by an adult from socialising with other young people;
- Displaying variations in eating patterns including overeating or loss of appetite;
- Weight loss for no apparent reason;
- An increasingly dirty or unkempt appearance, a change in appearance;
- Displaying frequent unexplained minor injuries;

- Going missing for a period of time;
- Sexual relationship with a significantly older person;
- Adults or older youths loitering outside or near child or young person;
- Excessive phone calls from an unknown adult or person;
- Inappropriate use of the internet and forming relationships.

4.7 Dealing with a Potential Victim of Abuse

When dealing with a potential victim of abuse:

- React calmly so as not to frighten the child or young person;
- Listen carefully to the child or young person;
- Take what the child or young person says seriously, recognising that there might be difficulties in interpreting what is being said;
- Keep questions to a minimum to ensure an accurate understanding of what has been said;
- Reassure the child, but do not make promises of confidentiality which might be impossible to keep;
- Make a full written record of what is said, heard and/or seen as soon as possible;
- The Safeguarding Officer should take witness statements and gather any relevant documentation.

4.8 Process C - Procedure for Managing Allegations against Adults

This procedure is for managing allegations of harm or concerns about adults working with children or young people, which may render an adult unsuitable to work with children. The key principle is that children and young adults are appropriately safeguarded and that the process is proportionate, consistent and timely. The process of any investigation can be very difficult and stressful for those involved, support is offered for both the children, young persons and the adult/s involved.

a. Step 1: Identifying cases

If you have a concern or an allegation is made about a person who works with children whether a professional, a staff member, volunteers, teacher or carer and they may have:

- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person;
- Possibly committed a criminal offence against a child or young person or related to a child or young person;
- Behaved towards a child, children or young person in a way that indicates s/he is unsuitable to work with children or young persons.

b. Step 2: Reporting procedure

- The member of staff should first report the matter to the Safeguarding Officer or their senior manager or the Brio Safeguarding Lead who is responsible for allegation management and who will liaise with the LADO (Local Authority Designated Officer) within the Local Authority Safeguarding unit;
- In the absence of either a Safeguarding Officer the Brio Safeguarding Lead will discuss the matter with a Brio site senior manager who will assess the allegation;
- If the allegation meets the criteria for referral the Safeguarding Officer can report or seek advice from a senior manager, the Safeguarding Lead or the LADO, contact number 0151 337 4570;
- The Safeguarding Lead must make a referral within one working day of the allegation. The LADO referral form can be obtained via this link: <https://www.cheshirewestlscb.org.uk/policy-and-procedures/allegations-management-lado/>.
- Once a referral has been completed it needs to be sent immediately to the Safeguarding Unit at safeguardinglado@cheshirewestandchester.gcsx.gov.uk.

5. Promoting good practice

- 5.1 All children and young people have the right to be safe and to be treated with dignity and respect. The following guidelines will help to protect young people, volunteers and the organisation as a whole.

5.2 It is possible to reduce the potential for the abuse of young people whilst protecting staff from allegations of abuse by using the following basic guidelines:

5.3 **Guidelines for Employees, Coaches and Volunteers**

- Children and young people in Brio's direct care should never be left unattended;
- Comply with the relevant national governing bodies' safeguarding guidance;
- Situations where a staff member or volunteer and an individual child are completely unobserved should be avoided whenever possible;
- Parents should take responsibility for their child in changing rooms when possible. If groups do need to be supervised in changing rooms, adults should preferably work in pairs;
- If any form of manual support is required during an activity, it should be provided openly according to guidelines provided by the relevant national governing body.

5.4 **It is advisable not to:**

- Spend time alone with young people away from others;
- Take young people alone on car journeys, even in the event of illness or an accident;
- Take young people to the home of staff or volunteers;
- Make contact with children from the work environment via social media;
- Engage in rough, physical or sexually provocative physical activities;
- Allow or engage in any form of inappropriate contact;
- Condone inappropriate language;
- Make sexually suggestive comments to a child or young person, even in fun;
- Become involved in personal task which young people can do for themselves.

5.5 Recruitment and Induction

All employees and volunteers:

- Who directly supervise children and young people as a requirement within their role will be screened via the Disclosure and Barring Service (DBS) as part of the recruitment process;
- Will have an updated DBS every 3 years throughout their employment;
- Employees or Volunteers working within the Integrated Wellness contract will be rescreened every 12 months;
- Who teach or coach children in sporting and activity sessions must hold a valid and appropriate qualification for the activity delivery;
- Will be expected to maintain a current technical knowledge and skill of the intended activity via CPD (Continuing Professional Development) and relevant ongoing training and updates;
- Are required to read, understand the safeguarding policy and procedures;
- Will be trained to the appropriate level for their role;
- All Safeguarding Officers will receive regular training on safeguarding and reporting processes.
- All new employees to Brio will undergo a Company and site induction and be familiar with Brio's policies and procedures.

5.6 Facility and Operations.

- Brio Leisure where possible will ensure the design and operations of its services takes into consideration safeguarding, most notably in new builds, but where this is not possible, sites will undergo a risk assessment of its services/ activities to ensure the environment is safe for children and vulnerable adults.
- Brio's operational policies will reflect good practice in relation to safeguarding, such as admission policy, social media policy and clear guidance on photography across Brio facilities.

57 **Photography/ Filming.**

- Whilst promoting and advertising our services are important to our organisation, the protection of children and those within our centres are paramount.
- Brio Leisure do not permit customers taking photographs or filming in or around the pool/changing room and gym areas. This is regularly reminded to customers via visible posters at these locations on all our sites.
- If we as an organisation require close-up photographs of children for promotional/marketing materials, a parental agreement form must be signed in advance and stored according to Brio's conditions of use.
- Images for marketing materials will always be appropriate to the sport/activity that it is promoting. No images will be used without consent or without taking into consideration the best interest of the child.
- Where large scale events occur and consent agreements cannot be obtained, all those in attendance will be notified of any professional photography or filming taking place and will be notified of the reasons behind this.
- All Brio employees and volunteers must report to the site management team if they suspect any intrusive or inappropriate images are being taken or recorded.
- Members and customers are encouraged to also be vigilant and report any concerns they have to the site management team.

5.8 **Social Networking.**

- Brio Leisure recognises that during the course of service delivery staff may need to make use of the internet and social media to communicate with staff and customers.
- Whilst there are many benefits to the use of social networking, it can also pose as a potential safeguarding risk-all staff when using social networking for Brio purposes must adhere to the acceptable use and behaviour within the Social Networking Policy HRPO-10.41.

5.9 Monitoring and recording.

- All safeguarding cases are recorded and monitored on a quarterly basis.

6. Contacts

Brio Safeguarding Lead:	01244 567255
Email:	jessica.arkley@brioleisure.org or hr@brioleisure.org
LSCB website:	http://www.cheshirewestlscb.org.uk
iArt:	0300 123 7047
EDT:	01244 977277
LADO:	0151 337 4570
Email:	safeguardinglado@cheshirewestandchester.gcsx.gov.uk
Cheshire Police Protection Unit referrals:	01606 364294
Email:	western.ppu@cheshire.pnn.police.uk

7. Useful Resources

Working Together to Safeguard Children:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

Child Protection in Sports Unit:

<https://thecpsu.org.uk/>

Cheshire West and Chester Safeguarding Children Partnership:

<https://www.cheshirewestscp.co.uk/>

Cheshire West and Chester Vulnerable Adults:

<https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/keeping-safe/vulnerable-adults/vulnerable-adults.aspx>