

# Safeguarding Policy & Procedures

**Contents:**

- 1. Safeguarding Policy Statement**
- 2. Disclosure & Barring Service & Checking**
- 3. Adopting Safe Recruitment Procedures**
- 4. Induction and Training for Staff Volunteers**
- 5. General Supervision**
- 6. Promoting Good Practice**
- 7. Definitions and Signs of Abuse**
- 8. Child Sexual Exploitation & Radicalisation**
- 9. Images & Social Media**
- 10. Positions of trust**
- 11. Alcohol and Drugs**
- 12. Guidance on how to respond to and disclosures of abuse**
- 13. Reporting Procedures**
- 14. Whistle Blowing Procedures**
- 15. Child Welfare and Concern Report Form**
- 16. Safeguarding Procedure – Line Managers**
- 17. Safeguarding Procedure – Coaches/Volunteers**
- 18. Safe Environment**

- 19. Insurance**
- 20. Code of Conduct and Ethics**
- 21. Contact Details**
- 22. Policy Review and Signatures**

## **1. Safeguarding Policy Statement**

Dallaglio RugbyWorks believes that all children and young people have the right to enjoy a high quality education and community engagement experience, including sport and physical activity, without any form of harassment or abuse.

All those involved with Dallaglio RugbyWorks have a moral and legal responsibility to protect all children and young people, regardless of age, disability, gender, racial origin and sexual orientation or identity from abuse. All Dallaglio RugbyWorks staff are aware, through induction training, of all forms of abuse, good practice and also what to do if abuse is suspected to ensure that the welfare of children and young people in their care is safeguarded.

This document sets out the policy of Dallaglio RugbyWorks in relation to the programmes / projects delivered and managed by Dallaglio RugbyWorks and is based on the following principles:

- The welfare of children and young people (the Children's Act 1989 defines a young person as under 18 years of age) and disabled adults is the prime concern.
- All young people, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse.
- It is the responsibility of the child protection experts to determine whether or not abuse has taken place, but it is everyone's responsibilities to report any concerns.
- All incidents of suspicious poor practice and allegations will be taken seriously and responded to swiftly and appropriately.
- Confidentiality should be upheld in line with the Data Protection Act 1984 and the Human Rights Act 2000.

## **2. Disclosure & Barring Service & Checking**

Dallaglio RugbyWorks will ensure that all staff and volunteers involved in projects will have undergone DBS checks before being recruited for the programme. If this is not possible for volunteer then appropriate supervision will be put in place until clearance is obtained.

## **3. Adopting Safer Recruitment Procedures**

Dallaglio RugbyWorks staff and volunteers will have either been through or will go through a stringent recruitment process. This will involve an application form detailing employment history and two references which will be closely scrutinised by Dallaglio RugbyWorks. Staff and volunteers progressing will then be interviewed before entering into the DBS process. Enhanced clearance through DBS will be a condition of employment.

#### **4. Induction & Training for Staff and Volunteers**

All Dallaglio RugbyWorks staff and volunteers are aware of issues related to Child Protection and are aware of the four types of abuse.

Dallaglio RugbyWorks staff and volunteers have read this policy and understand that any concerns must be reported through the procedure to the Designated Safeguarding Lead. Both new and current staff and volunteers will undergo Good Practice and Child Protection training through the course of this programme whilst continually being supervised by Dallaglio RugbyWorks Designated Safeguarding Lead.

#### **5. General Supervision**

Dallaglio RugbyWorks will ensure that its staff and volunteers arrive in time to ensure that all equipment and facilities being used are safe and in good working order. Dallaglio RugbyWorks will ensure there are enough staff and volunteers to ensure that the activities can be run in a safe and enjoyable way. Dallaglio RugbyWorks will ensure that staff coaching a specific sport as part of any programme, have the relevant coaching qualification. Dallaglio RugbyWorks will ensure that a suitable number of male and female staff are available to support the gender split of participants.

Health and Safety guidelines will be adhered to at any venues the programme uses including adoption of and authoring of appropriate risk assessments. If children participating in the programme are taken off site permission forms will be required from their parents/carers. This will be strictly enforced.

#### **6. Promoting good practice**

Principles of Good Practice

1. The welfare of the participants is paramount
2. Promote a culture in which all participants listen to and respect as individuals
3. Ensure that DRW's programmes are engaging, and that fair play is promoted
4. Challenge unacceptable behaviour
5. Report all concerns regarding unacceptable behaviour
6. Report all allegations/suspensions of abuse

Implementing Good Practice

To minimise the risk to children, young people and adults at risk the programmes will:

1. Ensure there is a person-centred approach which includes consultation and listening to participants opinions and issues.
2. Follow the DRW's policy and guidelines on recruitment and ensure that all individuals working with participants are screened, have the appropriate training/skills and attributes.
3. Ensure there are appropriate induction process is in place for new staff and volunteers.

4. Ensure all staff and volunteers have access to appropriate and relevant education and training.
5. Appoint and publicise the name of the Designated Safeguarding Lead and Deputy, who will be able to support and guide staff, volunteers, participants and parents on the issues and implementation of safeguarding, welfare and good practice
6. Follow DRW's Anti-Harassment and Bullying Policy, ensuring that this is publicised, and all staff and volunteers understand the policy.
7. Ensure that all staff, volunteers and participants and parents comply with DRW's Code of Conduct.
8. Adopt good practice policies and processes for:
  - a. Working with children
  - b. Changing
  - c. Dropping off and collecting participants at the programme (incl. Transporting participants)
  - d. Supervision of and communication with Participants
  - e. Photography and use of images
9. Regarding referrals to the Designated Safeguarding Lead:
  - a. Ensure you follow the DRW disclosure process
  - b. All handwritten notes and any other recording along with a timeline must be securely retained.

Good Practice when working with children, young people and adults at risk:

- ✓ Always work in an open environment – avoid private or unobserved situations. Encourage an open environment (e.g. no secrets)
- ✓ Treat all people equally, and with respect and dignity
- ✓ Always put the welfare of each person first – before winning or achieving goals
- ✓ Maintain a safe and appropriate distance and professional relationships with participants (e.g. it is not appropriate to have an intimate relationship with any participants or to share a room with them)
- ✓ Build balanced relationships based on mutual trust which empowers people to share in the decision-making process
- ✓ Ensure that if any form of manual / physical support is required, it should be provided openly and according to guidelines provided by the school or organisation
- ✓ If sports coaching, be aware that care is needed as it is difficult to maintain hand positions when the child is constantly moving. Participants should always be consulted, and their agreement gained.
- ✓ Keep up to date with the technical skills, qualifications and insurance in order to continue to deliver to participants.
- ✓ Involve parents / carers wherever possible, e.g. for the responsibility of their children in the changing rooms. If groups have to be supervised in the changing rooms, always ensure parents / carers / teachers / officials work in pairs.
- ✓ Ensure that during any residential, adults should not enter or invite any participants into their rooms
- ✓ Be an excellent role model – this includes not smoking or drinking alcohol in the company of participants.
- ✓ Give enthusiastic and constructive feedback rather than negative criticism.

✓ Recognise the developmental needs and capacity of the participants – avoid excessive training or competition and not pushing them against their will or beyond their capabilities.

Practice to be avoided:

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of someone in charge in the organisation or the child's parent/carers. For example, a young person sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a young person up at the end of a session.

- Avoid spending time alone with participants away from others
- Avoid taking participants alone on car journeys, however short

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games
- Share a room with a participant
- Allow or engage in any form of inappropriate touching
- Take participants to your home where they will be alone with you
- Allow participants to use inappropriate language unchallenged
- Make sexually suggestive comments to a participant, even in fun
- Fail to act on and record allegations made by a participant
- Do things of a personal nature for any participant they can do for themselves
- Constantly shout at and taunt a participant
- Use inappropriate language

Be Aware:

➤ There is a need to be responsive to a person's reactions. If a person is fully dependant on you, talk with him / her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

➤ If you accidentally hurt a person, he / she seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands or misinterprets something you have done, report any such incident as soon as possible to another colleague and make a brief written note of it then follow the Dallaglio RugbyWorks Safeguarding Procedure in reporting the incident.

• Good Practice – Changing

✓ Participants aged 11 and under must be supervised at all times in changing rooms by two members of staff, of the same gender as the participants.

✓ Adults, working with young teams, including, staff or volunteers, should not change or shower at the same time using the same facility as participants.

- ✓ If adults and participants need to share a changing facility, DRW must have consent from the parent/carers that their child/children can share a changing room with adults and be made aware of DRW's guidelines for good practice.
- ✓ If younger participants need to share changing facilities with adults, their parent/carers should be allowed to supervise them whilst they are changing.
- ✓ If participants are uncomfortable changing or showering in public, no pressure should be placed on them to do so. Encourage them to do this at home.
- ✓ If the programme has disabled participants involve them and their carers in deciding how, if applicable, they wish to be assisted to change and ensure they provide full consent to any support or assistance required
- ✓ The use of mobile phones should be banned from the changing rooms
- ✓ Photographs and any other media are strictly banned from changing rooms.

Good Practice Dropping off and collecting participants at the programme

Transportation:

- ✓ The School will be responsible for participants in their care.
- ✓ Assess whether the offsite activity is necessary and practical.
- ✓ Seek permission from the host school to transport the participants off site.
- ✓ Use transport provided by the School in the first instance.
- ✓ Use public transport in the second instance.
- ✓ It is not the staff or volunteer's responsibility to transport the participants to and from the programme.
- ✓ The School will provide the parents/carers with a contact number which may be used if the parent/carer will be late to collect their child/children
- ✓ DRW or the School will ask the participant/parents/carer to complete a form providing contact details, information about their child/children i.e. medical details etc.

Late Collection:

If a parent /carer is late DRW will:

- ✓ Attempt to contact the parent/carer.
- ✓ Check the programme contact number for any information regarding the participants.
- ✓ Wait with the participants, at the programme venue, wherever possible with other staff / volunteers or parents. This should be done until a resolution has been found.
- ✓ If parents/carers remain un-contactable staff will need to report the situation to Children's Social Care or the Police.

In emergencies staff and volunteers are permitted to use their own car, providing they:

- ✓ Contact DRW for signoff, before the session.
- ✓ Obtain additional permission from the School.



- ✓ Notify the School and DRW of anticipated time of departure and time of your arrival.
- ✓ Text DRW whatsapp group when you have arrived at your destination.
- ✓ You MUST have the appropriate business insurance.

Practice to be avoided – staff and volunteers should not:

- Remove a participant from the school / host site without host permission.
- Transport a participant via a method that has not been approved.
- Send a participant home with another person without permission or consulting another member of staff.
- Transport a participant in your car without permission from DRW and the School.
- Leave a participant in your car unsupervised.

Good Practice - Supervision of and communication with participants:

- For participants over the age of 8 – the ratio of adults to children is a minimum 1:10
- For participants under the age of 8 government guidance outlined in the Care Standards Act 2000 should be followed
- All venues should have First Aid provision by ensuring:
  - ✓ There is a qualified First Aider on site
  - ✓ First Aid boxes are up to date and accessible
  - ✓ There is access to a phone to be able to contact the emergency services if required
- All communication with young people should be through DRW or the School and between the hours of 9am-5pm
- Use of group Whatsapp to support the communication with Year 12 mentees is allowed but a minimum of 2 DRW staff members must be included within the group.

\*If you do to contact the young person due to an emergency this needs to be done in a professional manner, in line with DRW's code of conduct. Calling a participant from your own phone is not recommended, but if this is essential it is recommended that you withhold your own number.

(Use your mobile phone settings or, to withhold your number on individual calls, dial 141 before the telephone number you want to call)

## **7. Definitions and Signs of Abuse**

Recognised forms of abuse:

### **Neglect**

Where an adult fails to meet a child's basic needs like food or warm clothing, fails or refuses to give children love, affection and attention. Neglect in a sports situation could include a teacher or coach not ensuring children

were safe, exposing them to undue cold, heat, unnecessary risk of injury including not providing the correct kit or equipment.

### **Physical Abuse**

Where someone physically hurts or injures a child or young person by hitting, shaking, squeezing, and burning, poisoning, throwing, suffocating or otherwise causing physical harm to the child. In a sports situation physical abuse might occur when the intensity of training and competition exceeds the capacity of the child's immature and growing body.

### **Sexual Abuse**

Where girls and boys are abused by adults or other children – male or female - who use children to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex and fondling or showing pornographic material. In sport, coaching techniques that involve physical contact with children could potentially create situations where sexual abuse may go unnoticed. The power of the coach over young performers, if misused, may also lead to abusive situations developing.

### **Emotional Abuse**

The persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. This may involve causing children to feel frightened or in danger by constantly being shouted at or taunted which may make the child very nervous or withdrawn. Emotional abuse in sport may occur if children are subjected to constant criticism, name-calling, sarcasm, bullying, racism or unrealistic pressure to high expectations.

### **Financial 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

### **Discriminatory Abuse**

Including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

### **Institutional Abuse**

May take the form of isolated incidents of poor and unprofessional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.

## **Domestic Abuse**

The Government defines domestic violence as "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between people aged 16 years or over who are or have been intimate partners or family members, regardless of gender or sexuality." This includes issues of concern to black and minority ethnic (BME) communities such as so called 'honourbased violence', female genital mutilation (FGM) and forced marriage.

Where there is evidence of domestic violence, the implications for any children in the household should be considered, including the possibility that the children may themselves be subject to violence, or may be harmed by witnessing or overhearing the violence.

## **Forced Marriage**

Is a marriage in which one or both spouses do not (or, in the case of some adults at risk, cannot) consent to the marriage and duress is involved. Duress can involve physical, psychological, financial, sexual and emotional pressure.

## **Honour- based Violence**

The term "honour crime" or "honour-based violence embraces a variety of crimes of violence (mainly, but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community.

## **Possible Indications of Abuse**

### **Indications that a child may be being abused include the following:**

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly situated on a part of the body not usually 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.
- Someone else (child or adult) expresses concern about the welfare of another child.
- Unexplained changes in behaviour (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper).
- Inappropriate sexual awareness.
- Engaging in sexually explicit behaviour.

- Distrust of adults, particularly those with whom a close relationship would normally have been expected.
- Has difficulty in making friends.
- Is prevented from socialising with other children.
- Displays variations in eating patterns including overeating or loss of appetite.
- Loses weight for no apparent reason.
- Becomes increasingly dirty or unkempt.

## **8. Child Sexual Exploitation (CSE) & Radicalisation**

The sexual exploitation of children and participants is a form of child sexual abuse. Working Together to Safeguard Children and the National Working Group for Sexually Exploited Children and Participants define sexual exploitation as:

“Sexual exploitation of children and participants under 18 involves exploitative situations, contexts and relationships where participants (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 another or others performing on them, sexual activities.”

Sexual exploitation can take many forms from the seemingly ‘consensual’ relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from their peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. Technology can also play a part in sexual abuse, for example, through its use to record abuse and share it with other like-minded individuals or as a medium to access children and participants in order to groom them. A common factor in all cases is the lack of free economic or moral choice.

### **County Lines**

CL is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or ‘deal lines’. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms.

CL is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. CL activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

### Spotting the signs

A young person's involvement in CL activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of CL involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

### What is cuckooing?

- Drug dealers use 'cuckooing' methods to target the most vulnerable individuals in our society.
- Cuckooing may be happening in your area and we want you to know what it is, how to spot the signs and what to do;
- Cuckooing happens when a drug-dealer befriends, blackmails, or extorts a vulnerable person who often lives alone - such as someone old, or someone with a drug addiction - then takes over their home and uses it as a place to sell drugs from;
- The drug dealers then 'pay' the victim with drugs, usually crack cocaine and heroin, in exchange for staying at their home. Dealers sometimes also use the home as payment for a debt owed to them by the occupant;
- They then use the home to run their CL drugs operation from, putting the occupant and consequently the local community at risk of violence;

### Spot the signs of cuckooing:

- Other people seen inside the house or flat who don't normally live there
- People coming and going from the property

- More taxis and cars than usual appearing at the property
- Not seeing the person who lives there as frequently
- When you do see the occupant, they may appear anxious or distracted
- Seeing drugs paraphernalia near to the property

If you spot any of these signs you can speak to local police on 101 or call 999 in an emergency;

- If you'd rather stay anonymous you can call the independent charity Crimestoppers on 0800 555 111.

## Spot the signs and report

If you work with young people and vulnerable adults we need your help to spot the signs of CL:

Vulnerable children and adults are being used in CL drug dealing. If you work with young people or vulnerable adults, for example health professionals, teachers, social workers, we need your help to spot the signs and speak out if you have concerns;

- Even if you're not sure, trust your instincts and you might help safeguard a young or vulnerable person;
- Children aged 15-17 make up the bulk of young people involved in CL, and we know both girls and boys are groomed, exploited and threatened with violence if they don't comply;
- They are exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business;
- Often the people don't see themselves as victims, they are flattered by the attention and gifts they receive, so it's up to us all to spot the signs
- Figures from National Referral Mechanism released recently showed the number of modern slavery cases involving UK minors went from 676 in 2017 to 1,421 in 2018.

Some of signs of CL are:

- An increase in visitors or cars to a house or flat;
- Regularly changing residents;
- Substance misuse or drug paraphernalia;
- Changes in young people: new unaffordable things, going missing, unexplained injuries;
- If you have concerns, trust your instincts.

What you can do to help tackle CL:

- You can speak to local police on 101 or call 999 in an emergency;
- If you'd rather stay anonymous you can call the independent charity Crimestoppers on 0800 555 111;

- If you are a young person who is worried about being involved in CL, or knows someone who is, you can speak to an adult and let them know how you feel;
- You can also contact [www.fearless.org](http://www.fearless.org) who allow you to pass on information about crime anonymously;
- You can also contact Childline on 0800 1111 – they are a private and confidential service where you can talk to counsellors about anything that is worrying you.

The Home Office has published guidance for frontline professionals on dealing with CL, this is part of the government’s approach to ending gang violence and exploitation.

The Guidance outlines what CL is, signs to look for in potential victims and what to do about it.

### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

What is extremism?

Extremism is defined in “Keeping children safe in education” (2015) as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs... calls for the death of members of our armed forces, whether in this country or overseas.’

Any idea or belief can become extreme:

- Political Extremism
- Environmental Extremism
- Animal Rights Extremism
- Religious Extremism

These views may pose a threat to certain groups in society and may or may not, become violent.

What is the Prevent duty?

The Prevent duty was introduced as part of the Counter-Terrorism and Security Act 2015. It requires schools, councils, prisons, police, health bodies, colleges and universities to have ‘due regard to preventing people from being drawn into terrorism’. Frontline staff in key sectors, including sport, have a significant role to play.

What does this mean?

As an organisation working with children and participants, organisations should:

- Ensure they have robust safeguarding policies and procedures.
- Inform staff and volunteers of what might constitute signs of radicalisation
- Clear guidelines about who to report concerns to.
- Ensuring that there is no access to terrorist or extremist materials available at or through the sport.

Where a member of staff has any concerns about the risk of possible or actual radicalisation of an individual, then (s)he is required to report that immediately to a Designated Safeguarding Officer. They will then refer the concern via CHANNEL, which uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

Who should concerns be referred to?

Concerns can be reported through several channels:

- The Anti-Terrorism Hotline – 0800 789321 – for immediate concerns
- [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism) - for reporting of non-emergency information
- CHANNEL is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

It is also important to ensure that any concerns are reported to the Designated Safeguarding Lead using the appropriate process.

## 9. Images and Social Media

When using digital images staff should inform and educate participants about the risk associated with taking, sharing, publicising and distributing them. They should recognise the risks attached to publishing their own images on the internet, including social networking sites.

- Staff and volunteers are allowed to take digital / video images to support their work but must follow DRW policies including obtaining informed consent. These images are allowed to be taken on personal equipment but must always be in a professional manner.
- Digital and video images should be passed to the communications team promptly and then deleted from personal equipment immediately.
- Care should be taken when taking images that participants are appropriately dressed and are not participating in activities that might bring the participants or DRW into disrepute.
- Participants, staff and/or volunteers must not take, share, publish or distribute images of others without their written permission.
- Photographs publicised on the DRW website, or elsewhere must be selected carefully and comply with good practice guidelines on the use of such images.
- Parents / carers permission should be obtained at all times for participants under the age of 16 years.

**Why use social media:** The widespread use of social media brings opportunities to understand, engage and communicate with participants and practitioners in new ways, it is important that we use these technologies effectively and flexibly.



How to use social media safely: There are 3 basic online identities

- Personal • Professional • Organisational

By modelling good practice in your own engagement with the internet you can support participants to be safe, and to engage positively. All staff and volunteers working for DRW need to model the positive use of technologies.

If you have a professional / work profile on the internet, make sure your profile clearly explains;

- who you are,
- who you work for,
- how participants can verify your identity
- offer links to summaries of any relevant policies and information participants should be aware of (i.e. who to contact if any concerns/complaints about your activities on site)
- always be honest about any limits to your engagement online (i.e. I can't offer one to one advice here, but you can contact XYZ if you want someone to talk to)

**Bullying** in any form is unacceptable and with new technologies comes a new form of bullying, cyberbullying. Cyberbullying is no different from any other forms of bullying; the behaviour is the same and the impact is no less devastating. Cyberbullying is the term used to define bullying behaviour that takes place via mobile phone or over the internet through emails, instant messaging and social networking sites

**Friend Requests** – if you have a personal social networking account – do not 'friend' participants or add them to your contact list. You may be giving them access to personal information and allowing them to contact you inappropriately. They may also be giving you access to their personal information and activities without realising it.

**Groups** - If you create a group, host discussions or are encouraging media-sharing think about the rules / guidelines for participants engaging with this. You may find it useful to create group agreement with participants and the sorts of language and discussions allowed. Make sure these are accessible to all participants and are moderated by a DRW member of staff. If you want to use a web based social network site for a group or whole organisation, consider using a service that doesn't give you contact access to personal information and updates or allows collaboration without requiring permission i.e. a Facebook fan page or twitter list.

Keep a record of your activities on social media. Apply the same level of recording of your online activities as you would in face to face work.

Be a good ambassador. Whilst it is everyone's personal decision whether to use social media networks and tools you should always be aware that your behaviour and opinions reflect on DRW.

Before you post anything on the internet at work or at home, ask yourself these questions;

- Could this public expression impair my ability to work with my colleagues on a friendly basis?
- Would it make my colleagues uncomfortable?
- Would it make participants uncomfortable?
- Would it make parents / carers / other professional uncomfortable?
- Could it damage the reputation of my organisation?

Always express ideas and opinions in a respectful manner, make sure your communications are in good taste, be sensitive about linking to content and do not denigrate or insult others, including competitors.

### **Protect confidential information, yourself and your organisation:**

Online postings and conversations are not private. Realise that what you post will be around for a long time and could be shared by others.

- Avoid identifying and discussing others – including other organisations, your friends and co-workers – unless you have their permission
- Obtain permission before posting pictures of others, or before posting copied information.
- Externally communicating sensitive, confidential or financial information that is not intended for the public including; information related to specific projects / sessions, participants, partners, funders, partnership deals, funding bids, salary etc.) is ALWAYS forbidden and may be grounds for immediate dismissal and legal action.
- Posts should not speculate on DRW future plans, funding bids, recruitment or business prospects.

**Personal Information** - Astute criminals can piece together information you provide on different sites and then use it to impersonate you or someone you know – or even re-set your passwords.

If you do post personal information on a site like Facebook or Twitter, criminals can use it to send you emails that appear to come from a friend or other trusted source – even the site itself. Don't click links or attachments unless you trust the source.

**Disclaimer** - If you have a blog / social media presence and talk about work-related issues, add a disclaimer; to each page making clear that the views you express are your alone. Be aware that the disclaimer does not free you from the obligations under the Codes of Conduct policy.

Use a respectful Tone You may not post any material that is obscene, defamatory, profane, libellous, threatening, harassing, abusive, hateful or embarrasses another person. This includes but is not limited to comments regarding our organisational name, our employers, partners and competitors. You may not personally attack fellow employees, customers, stakeholders, management committee members, managers or participants.

Be transparent. It is important to keep distinct lines between your personal and professional life in the online world. Even when you are talking as an individual, people may perceive you to be talking on behalf of (organisation). It may be appropriate to add a disclaimer as above.

LOGO's. Only those authorised by Dallaglio RugbyWorks may use the organisation's logos in communications, so be sure you do not include this in your personal blogs or postings.

Speak the truth. If you are in a discussion that relates to DRW don't make unsubstantiated claims about features or performance. If you need to respond or make a comment on something specific, verify details through your line manager. Also, because situations change, make sure references or sources of information are current.

Keep your cool. One of the aims of social media is to create dialogue, and people won't always agree on an issue. When confronted with a difference of opinion, stay calm. Express your points in a clear, logical way. Sometimes, it's best to ignore a comment and not give it credibility by acknowledging it with a response.

Stay timely. Part of the appeal in social media is that the conversation occurs almost in real time. So, if you are going to participate in an active way, make sure you are willing to take the time to refresh content, respond to questions and update information regularly, and correct information when appropriate.

### **Purpose of using social media**

- To allow participants to use and access modern technology and methods of communication of their choice
- To provide a means of communicating with other participants in their programme and contributing to discussion and decision making regarding their participation
- To promote outcomes for participants, including enjoyment and achievement and making a positive contribution
- To provide a means of children and participants accessing information relating to their project, the wider community and beyond

### **Principles of using social media**

- We will reflect and reinforce our core values through the use of social media
- We will evidence our compliance with relevant legislation in relation to social media
- The use of social media will allow us to communicate with participants through a medium of their choice
- The use of social media will allow us to share information appropriately and safely with participants
- We can reinforce and provide evidence of good practice in our use of social media
- Using skilled staff to support the use of social media will help safeguard participants
- Using social media will ensure that we remain accountable to service users, funders and commissioners for the way in which we provide services
- Social media aimed at practitioners should be set up separately to be aimed at participants.

## **Responsibilities**

Staff and managers will ensure that:

- Programme clients (i.e. Schools) are informed of DRW's policies relating to this area of work
- Any participants utilising DRW's media team are above the legal age limit of 13 as upheld by all social media providers
- DRW will work with the programme client to promote e-safety to participants and their parents/carers.
- Skilled workers will be responsible for overseeing the development and implementation of a social media presence in our organisation.
- Skilled workers will take responsibility in any project for monitoring and moderating web pages
- Skilled workers will have the authority to remove offensive or inappropriate content
- Skilled workers will take responsibility for responding to any safeguarding concerns arising out of participants use of social media, including cyber-bullying and report any concerns to their manager immediately.
- Any social media pages developed will adhere to (organisation) branding guidelines including use of logos, colour schemes, layout etc.
- Information posted by staff will be accurate, relevant, updated regularly and removed where necessary
- Project information for participants and their parents will include information about their safe use of technology and social media.

## **Adopting Best Practice**

By adopting the points highlighted in these guidelines DRW will be putting into place the best possible practice to protect children/participants wherever and whenever photographs and recorded images are taken and stored.

These guidelines focus on the following key areas:

1. The publishing of photographic and/or recorded images of participants
2. The use of photographic filming equipment on DRW's programmes
3. The use of video equipment as a promotional material/coaching/education aid

And adopt the following key principles:

- The interests and welfare of participants taking part on programmes are paramount
- Parents/carers and participants have a right to decide whether their images are to be taken, and how those images may be used
- Parents/carers and participants must provide written consent for their images to be taken and used
- Images should convey the best principles and aspects of the programme, such as fairness and fun
- Care should be taken to ensure that images are not sexual or exploitative in nature, nor open to obvious misinterpretation and misuse
- Images should only be taken by authorised persons, as agreed in the protocol for a particular event/programme

- All images of participants should be securely stored
- In the case of images used on websites, particular care must be taken to ensure that no identifying details facilitate contact with a child by a potential abuser

#### Publishing Images - Easy Rules to Remember:

- Ask for written permission from the participant and parent/carer/s to take and use their image. This ensures that they are aware of the way the image is intended to be used to represent the sport/programme. Our Consent Form is one way of achieving this.
- If the participant is named, avoid using their photograph
- If a photograph is used, avoid naming the participant. And NEVER publish personal details (e.g. email addresses, telephone numbers, addresses etc.) of a participant.
- Only use images of participants in suitable dress to reduce the risk of inappropriate use.
- Try to focus on the activity rather than a particular child and where possible use photographs that represent the broad range of participants taking part in the programme.
- Ensure that images reflect positive aspects of participants involvement in the programme (enjoyment/competition etc.)

#### Use of Photographic Filming Equipment at DRW's Programmes

Dallaglio RugbyWorks does not want to prevent parents, carers or other spectators being able to take legitimate photographs or video footage of participants. However, there is evidence that certain individuals will visit events to take inappropriate photographs or video footage of participants. All athletes, staff and volunteers should be vigilant about this possibility. Any concerns during a programme should be reported to the DSL.

#### During a programme:

- Participants or parent/guardian (depending on age) will sign a consent form to use their image
- This image can then be used for the next two years
- After this time further consent is required from the participant to continue to use this image
- If consent is not given the image will be permanently deleted
- At any time, participant can withdraw the use of their image. If the image is already in the public domain then DRW has no obligation to withdraw this, but the image will be no longer used by DRW.

## **10. Position of Trust**

All adults who work with children, young people and adults at risk are in a position of trust that has been invested in them by the parents / carers, LP, Schools, DRW and the participant. This relationship can be described as one in which the adult member (staff or volunteer) is in a position of power and influence by virtue of their position.

The borrowing or lending of money between staff and volunteers with participants and or the giving or receiving of gifts is strictly not allowed and should be reported immediately.

Sexual intercourse or touching by an adult with a participant under the age of 16 years is unlawful, even where there is apparent consent from the participants. A consensual sexual relationship between an adult in a position of trust, within the DRW setting, and any participants or past participants is strictly prohibited.

In all of the programmes we deliver, adults are deemed to be in a position of trust and must recognise that there are certain boundaries between the staff and volunteers and the participant which must not be crossed in terms of the relationship with the participant. Any relationship that goes beyond the bounds of a professional relationship could be perceived as an abuse of trust and is contrary to this policy. If this were to happen, DRW would invoke the appropriate legal and disciplinary procedures.

DRW staff and athletes must not encourage a physical or emotionally dependant relationship to develop between any person in a position of trust, and a participant.

All those within the Dallaglio RugbyWorks organisation, have a duty to raise concerns about the behaviour of staff, partners and volunteers which may be harmful to the participants or any participant in their care, without prejudice to their own position.

No physical or emotionally dependant relationship should ever be formed with a participant or previous participant of any of our programmes.

## **11. Alcohol and Drugs**

The use of illegal drugs (to include legal highs and any drugs used for recreational purpose rather than medical) is prohibited whilst staff / volunteers are in the presence of, or responsible for, participants/young people.

- It is forbidden for staff / volunteers to consume alcohol whilst in the presence of, or whilst responsible for, participants/young people.
- If a staff / volunteer member is believed to be under the presence of alcohol or drugs whilst supervising or delivering programmes to participants/young people, they will be asked to leave the premises immediately.
- Staff / volunteers are prohibited from ever sharing with, providing or distributing alcohol or illegal drugs (to include legal highs) to participants/children/ young people.

## **12. 12. Guidance on how to respond to and disclosures of abuse**

- React calmly so as to not frighten the child.
- Tell the child he/she is not to blame and that he/she has the right to tell.

- Take what the child says seriously.
- Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said.
- Reassure the child but do not make promises of confidentiality, which may not subsequently be feasible, and explain why promises cannot be made.
- Make a full record of what has been said, heard and/or seen as soon as possible.

It is not the responsibility of anyone working under the auspices of sport in a paid or unpaid capacity for Dallaglio RugbyWorks, to take responsibility or to decide whether or not child abuse is taking place. However, there is a responsibility to protect children in order that the appropriate agencies can then make inquiries and take any necessary action to protect the child.

### **13. Reporting Procedures**

The first point of contact for reporting should be to follow the line management thread, Dallaglio RugbyWorks Designated Safeguarding Lead will follow appropriate procedure. Dallaglio RugbyWorks staff/volunteers should fill in a Child Safety and Welfare Concern Report form as soon as is possible following the incident.

#### **Records and Information**

Information passed to the school, social services or the police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern.

Information should include the following:

- Date and time of what has occurred and the time the disclosure was made
- Names of people who were involved
- What was said or done by whom
- Any action taken by the group to investigate the matter
- Any further action, e.g. suspension of a worker or volunteer
- Where relevant, reasons why there is no referral to a statutory agency
- Names of person reporting and to whom reported

Reporting the matter to the school, police or social services department should not be delayed by attempts to obtain more information. Wherever possible, referrals telephoned to the social services department should be confirmed in writing within 24 hours. A record should also be made of the name and designation of the school,

social services member of staff or police officer to whom concerns were passed, together with the time and date of the call, in case any follow-up is needed.

**A copy of this information should be kept by Dallaglio RugbyWorks and be held under password protected files to ensure GDPR compliance.**

### **Social Services**

Social Services have a statutory duty under The Children's Act 1989 to ensure the welfare of children. When a child protection referral is made its staff has a legal responsibility to investigate. This may involve talking to the child and family and gathering information from other people who know the child. Enquiries may be carried out jointly with the police.

### **Sharing Concerns with parents**

There is always a commitment to work in partnership with parents and carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation. However, the first point of contact for all incidents will be the Safeguarding Lead at the school the child attends.

### **When it is Not Appropriate to Share Concerns with parents**

There are circumstances in which a child may be placed at even greater risk if such concerns were shared (e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately). In these, or where concerns still exist, any suspicious, allegation or incident of abuse must be reported to the designated person as soon as possible and recorded.

### **Designated Officer**

It is the responsibility of the individuals working with the young person in question to inform the relevant Safeguarding Lead at the school. If the Designated Safeguarding Lead is not available the person discovering or being informed of the abuse should immediately contact the Deputy Safeguarding Lead. In these circumstances you do not have to give your name but it is helpful if you can.

### **Expert Advice**

If you are not sure what to do, you can obtain advice by telephone by calling the NSPCC 24-hour free phone Helpline on 0808 800 500. The police also have specially trained safeguarding teams who will give guidance and support, and deal with out-of-office enquiries when social services are not available.

## **14. Whistle Blowing Procedures**



The Designated Safeguarding Lead may be informed of situations where they are unsure about whether the allegation constitutes abuse or not, and are therefore unclear about what action to take. Those responsible should always consult senior colleagues and gain advice from social services or the NSPCC if there is any doubt. This is because it may be just one of a series of other instances which together cause concern.

### **Support for the Reporter of Suspected Abuse**

It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be, abusing a child, will raise concerns among other staff or volunteers. This includes the difficulties inherent in reporting such matters.

Dallaglio RugbyWorks assures all staff/volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports his or her concerns about a colleague's practice or the possibility that a child may be being abused.

### **Action if there are Concerns**

- If, following consideration, the Designated Safeguarding Lead is unsure then she must contact the school Safeguarding Lead.
- If the allegation is about the Designated Safeguarding Lead, or the matter has been handled inadequately and concerns remain, it should be referred to the Chief Executive Officer of Dallaglio RugbyWorks and the Designated Board Member with the responsibility for Safeguarding.

### **Suspected Abuse**

- Any suspicion that a child has been abused by either a member of staff or a volunteer should be reported to the designated person, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- The designated person will refer the allegation to the relevant person at the school who may involve the police or go directly to the police if out of hours.
- The parents or carers of the child will be contacted as soon as possible following advice from the school.
- The designated person should also notify Dallaglio RugbyWorks who will decide who should deal with any media enquiries.

### **Action by Dallaglio RugbyWorks**

- Dallaglio RugbyWorks will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries. Confirmation of any decision will be referred to the Board for approval and oversight.

- Irrespective of the findings of the social services or police inquiries, Dallaglio RugbyWorks must assess all individual cases under the appropriate misconduct/disciplinary procedure, to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled with other staff and volunteers. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, Dallaglio RugbyWorks must reach a decision based on the available information that could suggest, on a balance of probability; it is more likely than not that the allegation is true. The welfare of children should always remain paramount.
- Consideration should be given about what support may be appropriate to children, parents and members of staff and also to the alleged perpetrator of the abuse.

**Allegations of Previous Abuse**

Allegations of abuse may be made some time after the event. Where such an allegation is made, Dallaglio RugbyWorks should follow the procedures as detailed above and report the matter to the social services or the police. This is because other children, either within or outside sport, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Children’s Act 1999.

**15. Child Welfare and Concern Report Form**

<b>Young Person’s Name:</b>	<b>Date of Birth:</b>
<b>Date and Time of Incident:</b>	<b>Date and Time (of writing):</b>
<b>Young Person’s School:</b>	
<b>Name:</b> ..... <b>Print</b> <b>Signature</b>	
<b>Job Title:</b>	
<b>Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?</b>	
<b>What is the young person’s account/perspective?</b>	

Professional opinion where relevant.
Any other relevant information (distinguish between fact and opinion). Previous concerns etc.
What needs to happen? Note actions, including names of anyone to whom your information was passed and when.

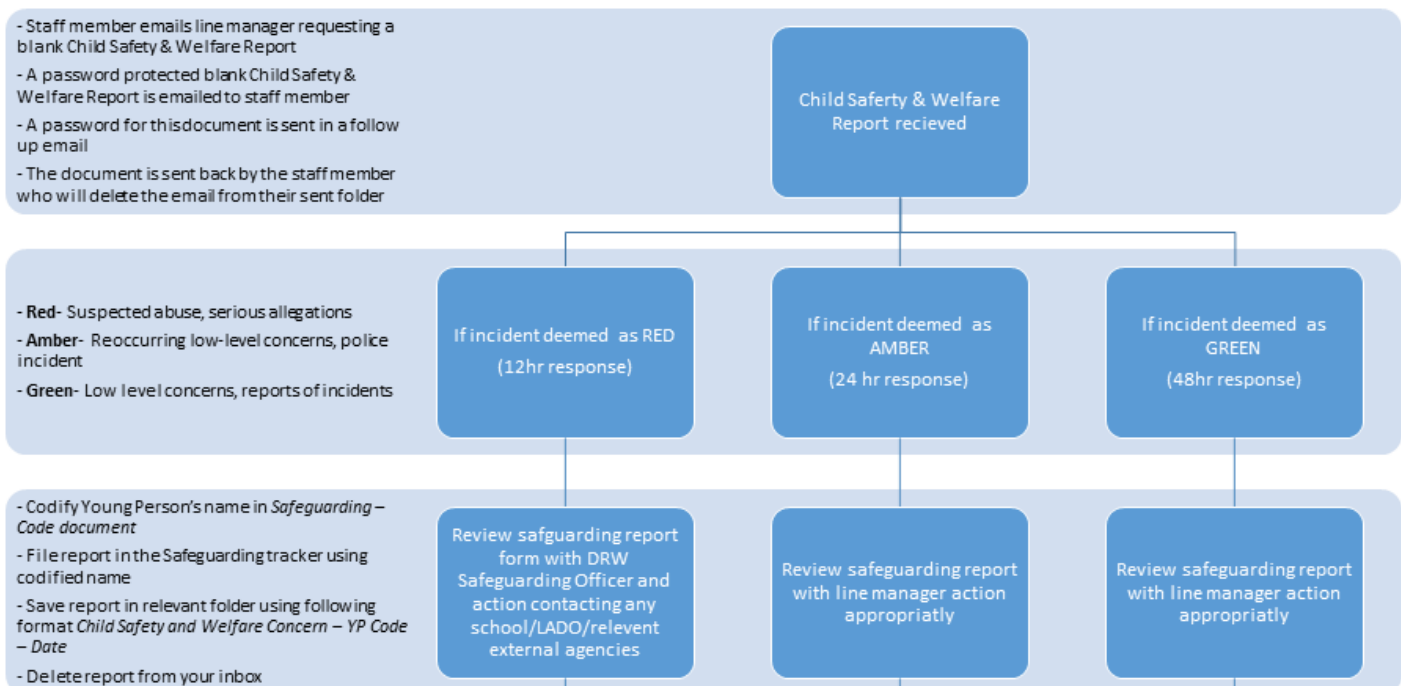
Check to make sure your report is clear to someone else reading it.

Please email this form to the line manager, delete from your sent folder, do not store locally on your laptop, and do not print.

NB.If action requires copy of this form should be sent to social services after the telephone report and to the (sport) Child Protection Officer.

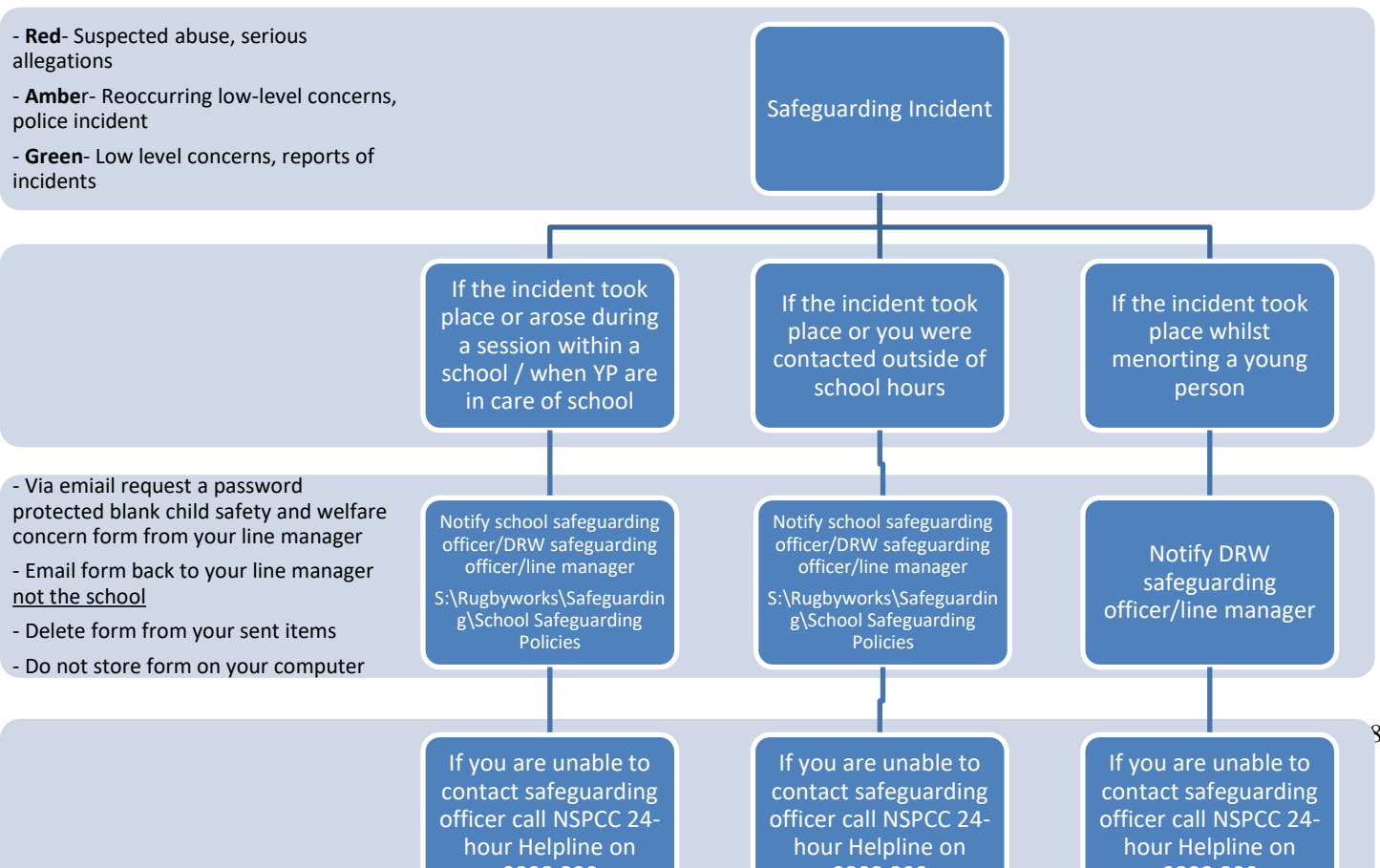
## 16. Safeguarding Procedure – Line Manager

Below is the guidance for DRW line management staff to support reporting procedure:



## 17. Safeguarding Procedure – Coaches/Volunteers

Below is the guidance for the DRW Coaching team:



## **18. Safe Environment**

The programmes being run by Dallaglio RugbyWorks will take place throughout England and Wales. The programme will be run at a range of locations that will have a Risk Analysis carried out before the programme begins. Dallaglio RugbyWorks staff and volunteers will ensure the centre and the equipment being used is safe and of a high quality before each session.

## **19. Insurance**

Dallaglio RugbyWorks has comprehensive insurance, which will cover the programmes covered by this policy document.

## **20. Code of conduct and ethics**

We are committed to safeguarding and promoting the well-being of all participants, staff and volunteers all associated with all DRW programmes. It is important that all those involved should at all times, show respect, and understanding for the welfare of others. The essence of good ethical conduct is summarised below and anything that falls outside of this is directly linked to our disciplinary procedures.

- Respect the rights, dignity and worth of every person and will treat everyone equally within the context of them taking part in activities regardless of age, ability, gender, race, ethnicity, religious belief, sexuality or social/economic status.
- Consider the wellbeing and safety of participants before the development of performance.
- Develop an appropriate working relationship with participants based on mutual trust and respect.
- Make sure all activities are appropriate to the age, ability and experience of those participating and ensure that all those taking part are prepared physically and mentally when learning new skills.
- Display consistently high standards of behaviour and appearance, dressing suitably and not using inappropriate language at any time.
- Never exert influence over participants to obtain personal benefit or reward.
- Never condone rule violations.
- Always report any incidents, referrals or disclosures immediately following appropriate guidelines set out in DRW's Safeguarding Policies and Procedures.
- Ensure that confidential information is not divulged unless with the express approval of all those concerned.

- Ensure that staff / participant ratios are maintained.
- Ensure that all issues/complaints go through the approved channels.
- Ensure neutrality in all activities.
- Arrive in plenty of time to set up activities and ensure that risk assessments are undertaken.
- At the outset clarify with participants (and where appropriate) their parents/carers exactly what is expected of them of what they can expect from you.
- Never transport participants in your own vehicle and will not arrange transportation for participants in private vehicles where they will be travelling solo.
- Never communicate inappropriately with participants by email, text, phone or social media.
- Never accept friend requests on social media platforms with participants.
- Be aware that discriminatory, offensive and violent behaviour will not be tolerated, and all complaints will be acted upon.
- Build balanced relationships based on mutual trust which empowers participants to share in the decision-making process.
- Maintain a clear boundary between friendship and intimacy with participants and do not conduct inappropriate relationships with participants.
- Never enter into a physical or emotionally dependant relationship should ever be formed with a participant or previous participant of any of our programmes.

## **21. Contact Details**

### Dallaglio RugbyWorks Designated Safeguarding Lead

Sarah Mortiboys

Mobile Number: 07894 706366

Email : [sarah@dallaglorugbyworks.com](mailto:sarah@dallaglorugbyworks.com)

### Dallaglio RugbyWorks Deputy Designated Safeguarding Lead

Phil Hannah

Mobile Number: 07584 621071

Email: [phil@dallaglorugbyworks.com](mailto:phil@dallaglorugbyworks.com)

### Designated Safeguarding Lead – Board Member

Zenna Hopson

Mobile Number: 07792 696551

Email: [zenna@zennahopson.com](mailto:zenna@zennahopson.com)

### Local Authority Designated Officer (LADO)

The LADO for the areas that Dallaglio RugbyWorks operates within can be found on the respective Local Authority website.

**If you have an immediate concern for the well-being of a child or young person, contact the Police on 999**

NSPCC Child Protection Helpline

Tel: 0808 800 5000

**22. Signatures & Review**

Dallaglio RugbyWorks Designated Safeguarding Lead will ensure that regular Safeguarding courses are run for staff and volunteers. The NSPCC Website will also be monitored regularly in case of alterations in Safeguarding Policy.

**Matthew Key**  
**Chairman**  
**Dallaglio RugbyWorks**  
**Date:**

**Sarah Mortiboys**  
**Designated Safeguard Lead**  
**Dallaglio RugbyWorks**  
**Date:**