



SAFEGUARDING ADULTS POLICY AND PROCEDURE

Review date: November 2021

Greenhouse Sports Safeguarding Adults Policy and Procedures

Foreword

The safety and well-being of all participants is at the heart of everything we do at Greenhouse Sports. The Greenhouse Sports Board of Trustees recognises and values greatly the safety of all Adults involved in any programme and activity that we deliver in accordance with the Care Act 2014. Trustees take full responsibility for ensuring that Greenhouse Sports works tirelessly to ensure that best practice is implemented across all the charity's operational, administrative and development activities without compromise. This policy, together with the accompanying guidance notes and training programme, is a clear and unequivocal statement of intent that demonstrates our commitment to all Adults, their families, our staff, our funders and supporters and all the other key stakeholder partners from across the communities within which we work.

The development and communication of this policy is once again a clear step in providing everyone working as part of the Greenhouse Sports team with a clear understanding of what is expected from them when working with our participants. To ensure awareness and understanding of the changes to the policy and the practical application of it to working practices at all levels, an updated programme of comprehensive training and development for all paid and voluntary members of our team will follow its publication. The Board of Trustees will also ensure that we not only continue to charge our team of people with employing all the good practice guidelines and principles set out within the policy at all times, but also look to continue to develop and improve our policies and practices by constantly reviewing and updating our procedures as and when legislation or other reasons require it.

I would like to thank everyone for their continued commitment to the development of this core piece of our work. I now set down the challenge to everyone involved with Greenhouse Sports to embrace the principles set out within it and continue to provide the highest quality safe, effective and friendly environments within which all Adults can reach their potential.

Beatrice Butsana-Sita (CEO)

Dated 29th September 2020

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1 Introduction to the Policy

Greenhouse Sports is committed to the belief that all Adults have a right to protection and the needs of disabled Adults and others who may be particularly vulnerable must be taken into account. Greenhouse Sports is committed to ensuring the safety and protection of all Adults involved through the operation of our policies in line with standards in this document. Relevant policies include: Safer Recruitment; Whistleblowing; Health & Safety; Data Protection; and E-Safety related policies (these can be found on the Greenhouse Sports website). In addition, our Code of Conduct can be found at Appendix A of this policy.

Greenhouse Sports has a duty of care to safeguard directly from harm all Adults involved in any programme and activity that we deliver. Greenhouse Sports also has the responsibility to ensure that, within all the programmes we deliver, any partner organisations must also have established policies and provide protection to Adults.

Greenhouse Sports is committed to devising and implementing policies so that everyone in the organisation, whether they are paid staff or volunteers, accepts their responsibilities to safeguard Adults from harm and abuse. This means following procedures to protect Adults and reporting any concerns about their welfare to appropriate authorities.

The aim of the policy is to promote good practice, providing Adults at Risk with appropriate safety/protection whilst in the care of Greenhouse Sports and to allow all staff to make informed and confident responses to specific safeguarding issues.

1.1 Principles

The guidance given in the policy and procedures is based on the following principles:

The six principles of Adult safeguarding

The Care Act sets out the following principles that should underpin safeguarding of Adults

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - The least intrusive response appropriate to the Risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability** - Accountability and transparency in delivering safeguarding.

1.2 Guidance and Legislation

The practices and procedures within this policy are based on the principles contained within the UK and legislation and Government Guidance and have been developed to complement the Safeguarding Adults Boards policy and procedures, and take the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 1998 and the General Data Protection Regulation 2018 (GDPR)

1.3 Definitions

To assist working through and understanding this policy a number of key definitions need to be explained:

- 1.3.1 **Adult at Risk** is a person aged 18 or over who is in need of care and support regardless of whether they are receiving them, and because of those needs are unable to protect themselves against abuse or neglect. In recent years there has been a marked shift away from using the term 'vulnerable' to describe Adults potentially at risk from harm or abuse.
- 1.3.2 **Abuse** is a violation of an individual's human and civil rights by another person or persons. See section 4 for further explanation.
- 1.3.3 **Adult** is anyone aged 18 or over.
- 1.4.4 **Adult safeguarding** is protecting a person's right to live in safety, free from abuse and neglect.
- 1.4.5 **Capacity** refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).
- 1.4.6 **Centre** is the Greenhouse Centre at 35 Cosway Street, London NW1 5NS
- 1.4.7 **DSL** is the Designated Safeguarding Lead and **DDSL** is the Deputy Designated Safeguarding Lead

1.4 Communication of the Policy

To ensure the successful implementation of this policy it is essential that we at Greenhouse Sports communicate to our entire staff, partners, Adults at Risk and their parents/ carers, our commitment to safeguarding.

In addition, access to the Policy is available to all staff, partners, parents, participants and the general public at large via the Greenhouse Sports website. This ensures people have access to this information and are able to understand both how the policy will be implemented and the process they should follow should an issue arise.

1.5 Monitoring and Review

The implementation of procedures will be regularly monitored and reviewed. The Designated Safeguarding Team at Greenhouse Sports (DST) will regularly report progress, challenges, difficulties, achievements, gaps and areas where changes are required to the Trustees via the Operations Committee.

The policy will be reviewed every year or whenever there is a major change in the organisation or in relevant legislation.

2 Organisation

2.1 Greenhouse Sports Designated Safeguarding Team

The Greenhouse Sports Designated Safeguarding Team is currently:
Designated Safeguarding Lead (DSL) – Chris Allbut; Adam Whale
Designated Safeguarding Leads for the Centre* safeguarding: Jason Sugrue, Daniel Basterfield & Maria Ingles (together the '**Centre DSLs**')
Deputy Designated Safeguarding Leads (DDSLs) Richard Joyce, Deputy Director of Programmes, Sarah Louis and Kiri Madhani, Delivery Managers

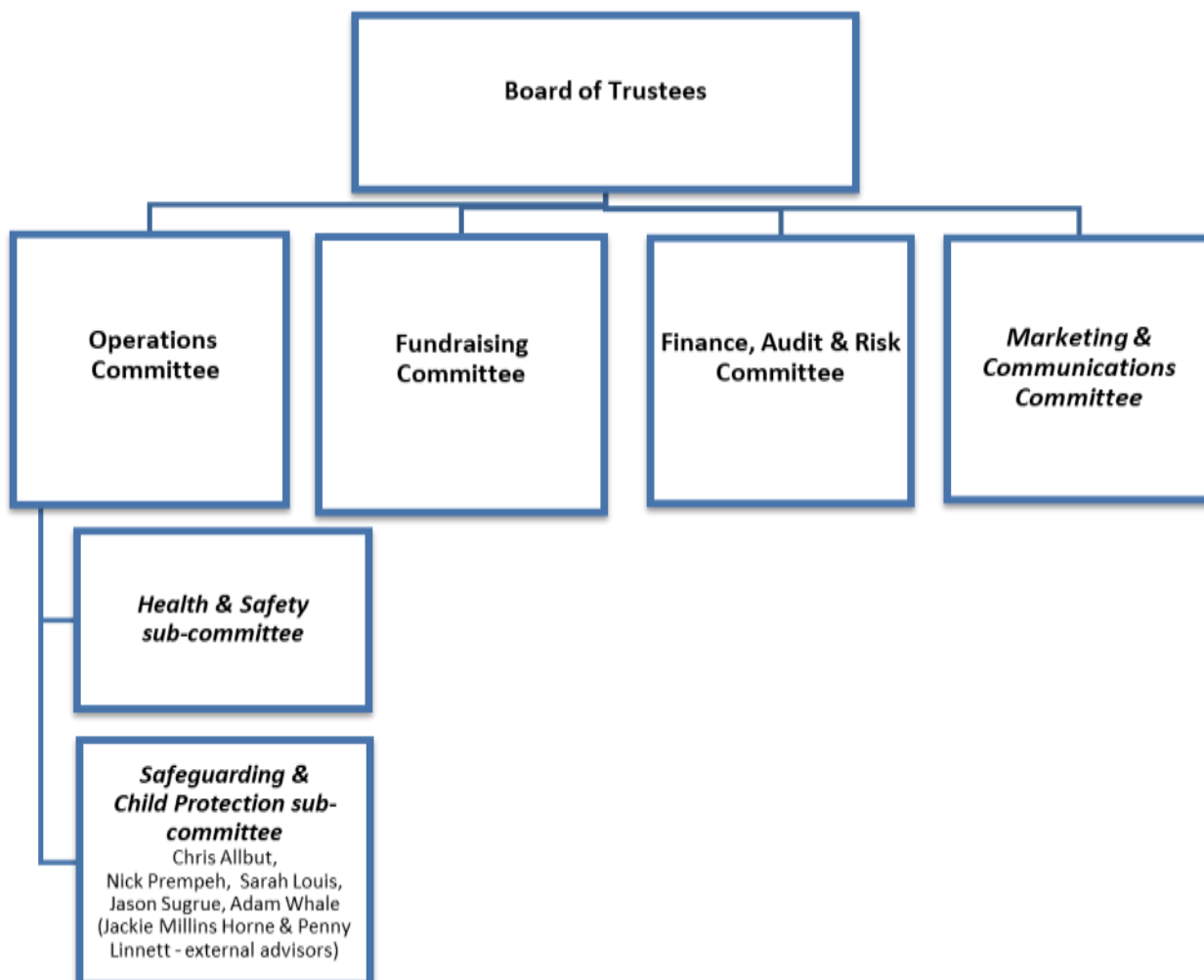
*The Greenhouse Centre, at 35 Cosway Street, London NW1 5NS (the 'Centre').

If you cannot contact any of the above, in an emergency, please contact the duty officer at the Centre.

2.2 Greenhouse Sports Safeguarding Structure



2.3 Greenhouse Sports Governance Structure



The board of trustees administers the charity and determines Greenhouse Sports' strategic direction. It is supported by the committees that meet regularly throughout the year. Each committee comprises trustees and relevant senior management.

3 Arrangements for dealing with safeguarding concerns

3.1 Introduction - Responding to Suspicions and Allegations

3.1.1 It is not the responsibility of anyone working at Greenhouse Sports in a paid or unpaid capacity to decide whether or not abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate people and authorities so that the necessary inquiries and actions are followed to protect the Adult.

3.2 Receiving Evidence of Possible Abuse

3.2.1 Greenhouse Sports staff may become aware of possible abuse in various ways. Greenhouse Sports staff may see it happening, may suspect it is happening because of signs that have been noticed, or may have it reported by someone else or directly by the Adult affected.

3.2.2 When an Adult reports directly to a Greenhouse Sports member of staff, it is particularly important for the member of staff to respond appropriately. If an Adult says or indicates that they are being abused, staff should:

- **Stay calm** so as not to frighten the Adult reporting.
- **Reassure** the Adult that they are not to blame and that it was right to tell.
- **Listen** to the Adult, showing that you are taking them seriously.
- **Keep questions to a minimum** so that there is a clear and accurate understanding of what has been said. (The law is very strict and abuse cases have been dismissed where it is felt that the Adult at Risk has been led and ideas have been suggested when questioning). Only ask questions to clarify.
- **Inform** the Adult that you have to inform other people about what they have told you. Tell the Adult this is to help stop the abuse continuing.
- **Safety of the Adult at Risk** is paramount. If the Adult needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a safeguarding issue.
- **Record** all information on the Incident Referral Form (Appendix B).
- **Report** the incident to a Centre Designated Safeguarding Lead (DSL) who will then contact the Greenhouse Sports Designated Safeguarding Team. If the Centre Safeguarding Officer is not available, the Centre duty officer or Greenhouse Sports Designated Safeguarding Team must be contacted.

3.3 Recording Information

3.3.1 To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern (Appendix B). In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions.

3.3.2 Information should include the following:

- The person's name, age and date of birth.
- The person's home address and telephone number.
- Whether or not the person making the report is expressing their concern or someone else's.
- The nature of the allegation, including dates, times and any other relevant information.
- A description of any visible bruising or injury, location, size etc. Also, any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The person's account, if it can be given, of what has happened and how any bruising/injuries occurred.
- Has anyone else been consulted? If so record details.
- Has anyone been alleged to be the abuser? Record details.

Liaise with a Centre DSL and the Greenhouse Sports Designated Safeguarding Team. Together they will formulate an action plan and advise you of any actions you need to take. No contact with any other person should be made unless part of the action plan. Once contacted record this communication.

3.4 Reporting the Concern

3.4.1 All suspicions and allegations MUST be reported appropriately. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.

3.4.2 Greenhouse Sports expects its members of staff to discuss any concerns they may have about the welfare of an Adult at Risk immediately with a Centre DSL, who will then contact the Greenhouse Sports Designated Safeguarding Team and subsequently check that appropriate action has been taken. If the Centre DSL is not available, the Centre duty officer or the Greenhouse Sports Designated Safeguarding Team must be contacted immediately.

3.4.3 If none of the Greenhouse Sports Designated Safeguarding Team is available then immediately seek advice from your local Adult Social Care department or the police (for key local authority numbers see Appendix D).

3.4.4 Two reporting procedure flow charts for allegations involving either an Adult at Risk or member of staff/volunteer are available (see below). Where there is a complaint against an employee or volunteer, there may be three types of investigation.

- **Criminal** in which case the police are immediately involved.
- **Safeguarding** in which case the social services and (possibly) the police will be involved.
- **Disciplinary or misconduct** in which case Greenhouse Sports will be involved.

Greenhouse Sports staff members are not safeguarding experts and it is not their responsibility to determine whether or not abuse has taken place. All suspicions and allegations must be shared with professional agencies that are responsible for safeguarding.

Adult Social Care has a legal responsibility under The Care Act 2014 to investigate all safeguarding referrals by talking to the Adult and family (where appropriate), gathering information from other people who know the person and making inquiries jointly with the police.

NB: If there is any doubt, you must report the incident: it may be just one of a series of other incidents which together cause concern.

3.4.5 Any suspicion that an Adult has been abused by an employee or a volunteer should be reported to a Centre DSL who will then contact the Greenhouse Sports Designated Safeguarding Team, who will take appropriate steps to ensure the safety of the Adult in question and any other person who may be at Risk. If a Centre DSL is not available, the Centre duty officer or the Greenhouse Sports Designated Safeguarding Team must be contacted immediately.

The Greenhouse Sports Designated Safeguarding Team will:

- Refer the matter within 24 hours to the appropriate Local Authority *Designated Officer and the Disclosure and Barring Service*. Remember to involve the Adult at Risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity.
- Include details of the allegation on a secured file.
- The parent/carer of the Adult will be contacted as soon as possible following advice from the social services department.
- The Head of HR should be notified, if applicable, to implement any immediate disciplinary proceedings that may be needed.
- If applicable, the Head of HR should notify the relevant sport's governing body.
- If appropriate, the Director of Development and Communications should also be notified to decide who will deal with any media.

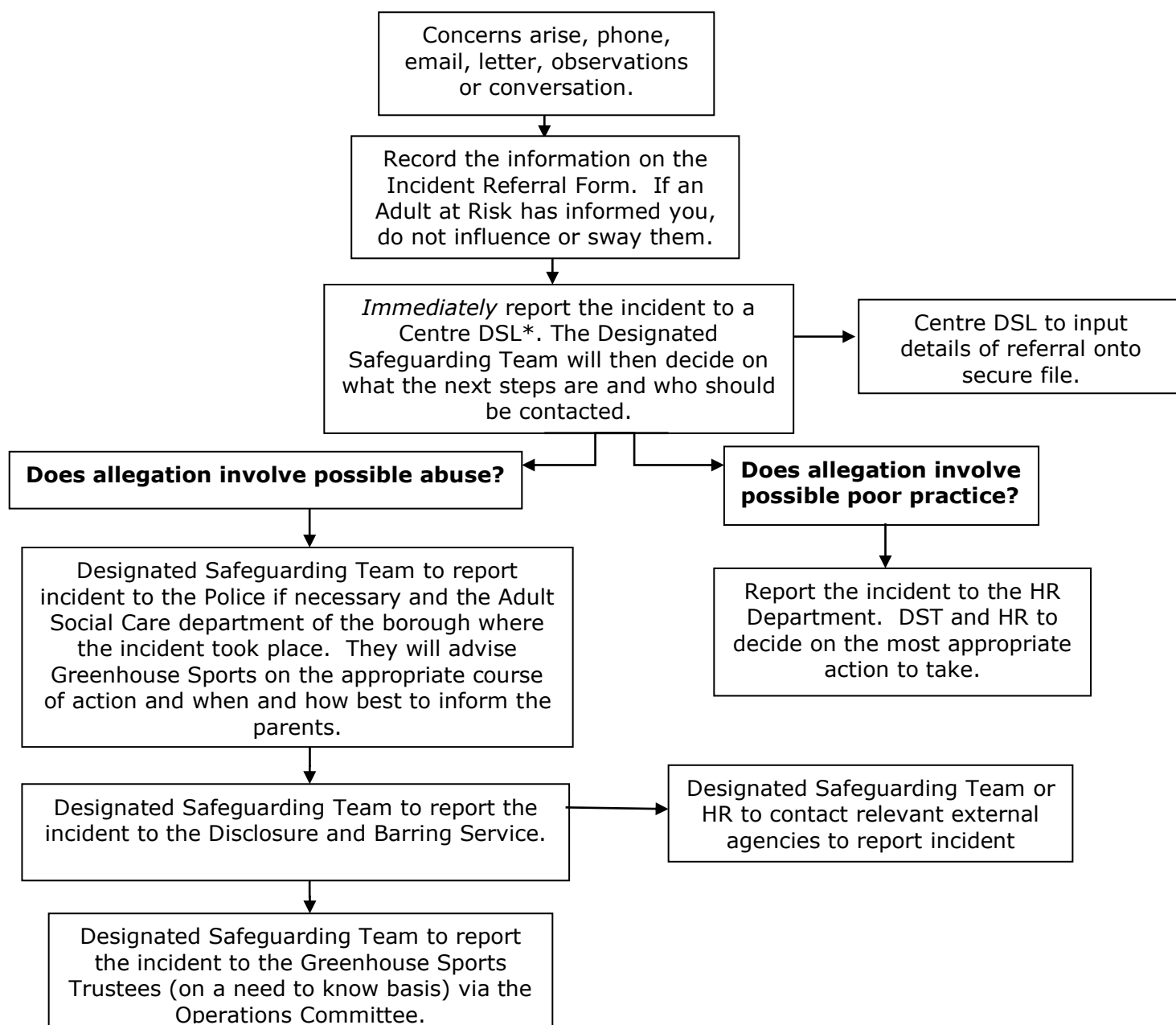
Notwithstanding the need to contact the people listed above, it is vital to maintain confidentiality on a need to know basis.

3.4.6 Allegations of abuse can be made some time after the event. When such allegations are made, you should follow the same procedures. This is because other Adults may be at Risk from the alleged abuser. Anyone who has a previous conviction for offences related to abuse against Adults at Risk is automatically excluded from working with them.

3.5 Concerns outside the immediate environment

3.5.1 You may become concerned about possible abuse to an Adult which is taking place outside the immediate Greenhouse Sports environment i.e. abuse at home or a residential or day care centre. You must still report your concerns to a Centre DSL who will contact the Greenhouse Sports Designated Safeguarding Team. If the Centre DSL is not available, the Centre duty officer or the Greenhouse Sports Designated Safeguarding Team must be contacted immediately.

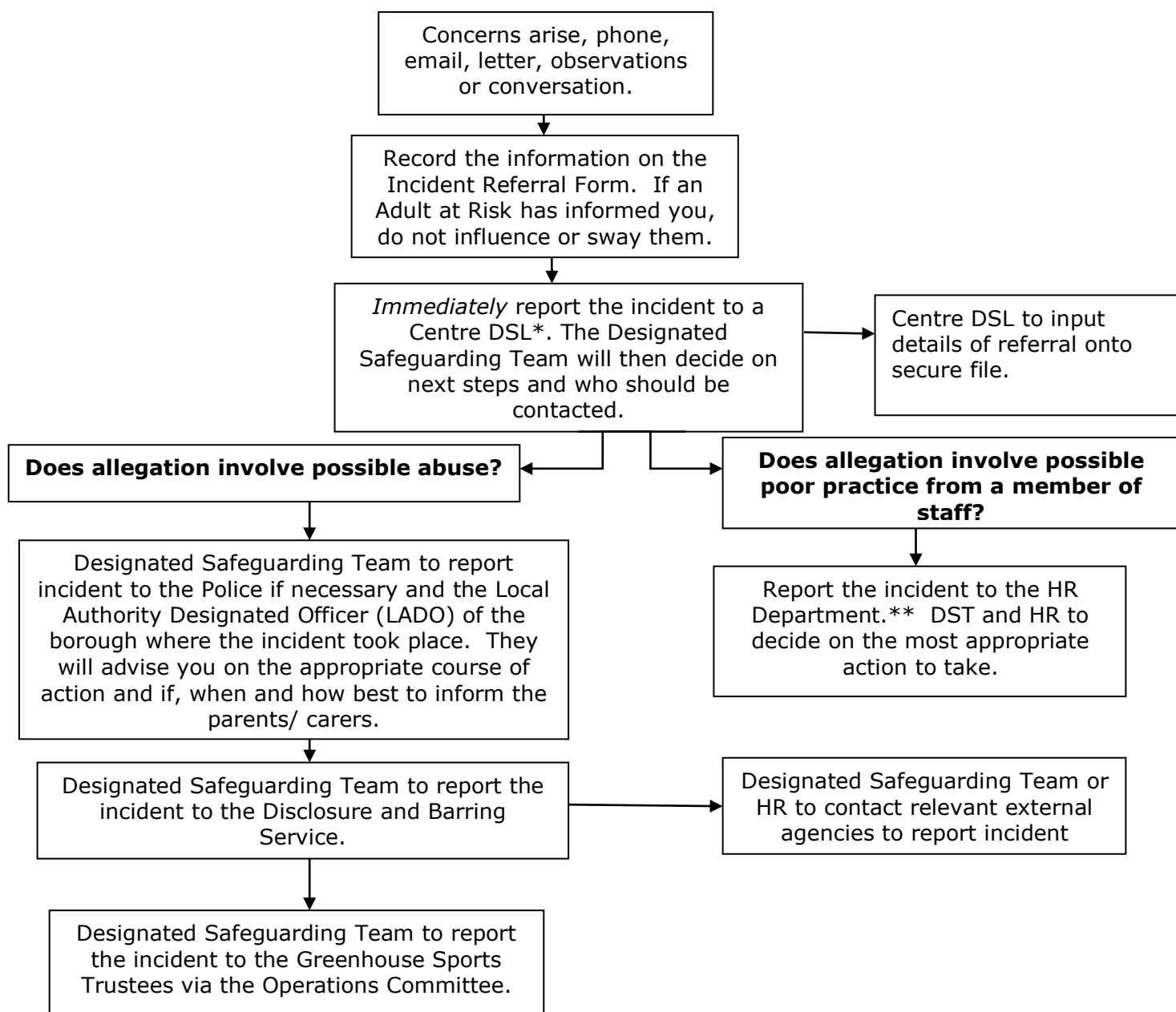
3.6 Process for responding to suspicions and allegations concerning an Adult at Risk



*. If a Centre DSL is not available, contact the Centre duty officer or another member of the Greenhouse Sports Designated Safeguarding Team immediately.

Remember to involve the Adult at Risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity.

3.7 Process for responding to suspicions and allegations concerning any person working with Adults at Risk



* If a Centre DSL is not available, contact the Centre duty officer or another member of the Greenhouse Sports Designated Safeguarding Team immediately.

**If the allegation involves a member of the Designated Safeguarding Team or HR, report the incident to the Greenhouse Sports CEO, who will decide on the most appropriate action to take.

Remember to involve the Adult at Risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity

3.8 Confidentiality & information sharing

3.8.1 Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The Greenhouse Sports Designated Safeguarding Team.
- The Centre duty officer
- Adult Social Care/Police.
- The parents/ carer of the Adult at Risk (unless the allegation involves a parent/ carer).
- The person making the allegation.
- The alleged abuser (and parents/carer if the alleged abuser is an Adult at Risk).

3.8.2 All information should be given to the Greenhouse Sports Designated Safeguarding Team and stored in a secure place for a minimum of 10 years with limited access to designated people, in line with data protection laws. Information classified as strictly confidential may only be exchanged electronically both within Greenhouse Sports and in exchanges with third parties if the information is strongly encrypted prior to exchange.

3.8.2 Timely information sharing is essential to effective safeguarding. The Data Protection Act (DPA) 2018 and the General Data Protection Regulation 2018 (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping Adults at Risk safe. This includes allowing practitioners to share information without consent.

3.8.3 The government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If you are in any doubt about sharing information, you should speak to a member of the Designated Safeguarding Team.

3.9 Internal Inquiries and Suspension

3.9.1 The Greenhouse Sports Designated Safeguarding Team in conjunction with HR will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

3.9.2 Irrespective of the findings of the Adult Social Care and or police inquiries, the Greenhouse Sports HR Department will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled. This may be a difficult decision; especially where there is insufficient evidence to uphold any action by the police. In such cases the HR Department must reach a decision based upon the available information which could suggest that, on the balance of probability, it is more likely than not that the allegation is true. The welfare of the Adult at Risk should remain of paramount importance throughout.

3.10 Additional policies

3.10.1 For specific guidance on: (i) Safer recruitment; (ii) Whistleblowing; (iii) Data Protection and (iv) E-safety/use of media - covering safeguarding procedures for photography, video, publishing and on-line work, please refer to the relevant policies available via the Greenhouse Sports website.

3.11 Duty of care to employees

3.11.1 Greenhouse Sports has a duty of care to its employees to ensure their safety and well-being. An employee receiving evidence of abuse will be assisted by a Centre DSL and the Greenhouse Sports Designated Safeguarding Team who will put in place an action plan to support that employee throughout the process.

4 Further information, references and good practice

4.1 Introduction - Types of abuse and determining good practice

To provide Adults at Risk with the best possible experience and opportunities at Greenhouse Sports everyone must operate within an accepted ethical framework which is set out in Appendix A - The Greenhouse Sports Code of Conduct for Staff and Volunteers.

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees or participants at Greenhouse Sports to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the Adult as explained above.

This section will help to identify what is meant by abuse, good practice and poor practice.

4.2 What is Abuse?

4.2.1 Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to an Adult regardless of their age, gender, sexual orientation, race, religion or ability.

4.2.2 The main types of abuse: **physical abuse, sexual abuse, emotional abuse, neglect and bullying**. The abuser may be a family member, someone the Adult encounters in residential care or in the community, including sports and physical activities. Any individual may abuse or neglect an Adult directly or may be responsible for abuse because they fail to prevent another person harming the Adult.

4.2.3 Adults with disabilities may be at increased Risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse has occurred.

4.3 Types of Abuse and Neglect - Definitions from the Care Act 2014

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

4.3.1 Physical Abuse: Includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. This could be a coach intentionally striking an athlete.

In sport, physical abuse may occur when the nature and intensity of training disregards the capability of the Adult at Risk.

4.3.2 Sexual Abuse: Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the Adult has not consented or was pressured into consenting.

In sport, this could be a fellow athlete who sends unwanted sexually explicit text messages to a learning-disabled Adult they are training alongside.

4.3.3 Emotional or Psychological Abuse: This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

In sport, this could be an athlete threatening another athlete with physical harm and persistently blaming them for poor performance.

4.3.4 Self-neglect: This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

In sport, this could be a player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.

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

In sport, this could be a coach not ensuring athletes have access to water.

4.3.6 Modern Slavery: Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

In sport, you may notice that a participant has been missing from practice sessions and is not responding to reminders from team members or coaches.

4.3.7 Domestic Abuse: Including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence.

In sport, you may notice a power imbalance between a participant and a family member.

4.3.8 Discriminatory: Discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

In sport, this could be the harassing of a club member because they are or are perceived to be transgender.

4.3.9 Organisational Abuse: Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

In sport, this could be training without a necessary break.

4.3.10 Financial or Material Abuse: Including theft, fraud, internet scamming, coercion in relation to an Adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. *This is more common in relation to older Adults.*

In sport, this could be someone taking equipment from an athlete with dementia.

4.3.11 Bullying: This may come from another Adult. Bullying is defined as deliberate, hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are four main types of bullying. It may be physical (e.g. hitting, kicking, slapping), verbal (e.g. racist or homophobic remarks, name-calling, graffiti, threats, abusive text messages), emotional (e.g. tormenting, ridiculing, humiliating, ignoring, isolating from the group), or sexual (e.g. unwanted physical contact or abusive comments).

In sport bullying may arise when a coach pushes the Adult too hard to succeed or a rival athlete or official uses bullying behaviour.

Not included in the Care Act 2014 but also relevant:

4.3 13 Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the Adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Additional forms of abuse exist - For details of the abuse of: 'Honour based' violence; Forced marriage; peer-on-peer abuse including 'sexting'; radicalisation; homelessness, serious violence, 'upskirting' see appendices

4.4 Indicators of Abuse

4.4.1 Even for those experienced in working with abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that an Adult is being abused 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.
- The Adult describes what appears to be an abusive act involving them.
- Another Adult expresses concern about the welfare of an Adult at Risk.
- Unexplained changes in an Adult's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper.
- Inappropriate sexual awareness or engaging in sexually explicit behaviour.
- Distrust of others, particularly those with whom a close relationship would normally be expected.
- Difficulty in making friends.
- Being prevented from socialising with others.
- Displaying variations in eating patterns including over-eating or loss of appetite.
- Losing weight for no apparent reason.
- Becoming increasingly dirty or unkempt.
- Over-tiredness.
- Suicidal threats or behaviours.
- Displaying frequent unexplained minor injuries.

4.4.2 Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training or enter competitions.
- An unexplained drop-off in performance.
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed-wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes.
- A shortage of money or frequent loss of possessions.

4.4.3 It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place.

It is NOT the responsibility of those working at Greenhouse Sports to decide that abuse is occurring, it is however their responsibility to act on any concerns by reporting any incident to a Centre DSL, as well as completing an Incident Referral Report Form (Appendix B). If a Centre DSL is not available, contact the Centre duty officer or the Greenhouse Sports Designated Safeguarding Team immediately.

4.5 Good Practice

4.5.1 By promoting good practice the occurrence of abuse of Adults at Risk should be reduced and this should also protect Greenhouse Sports staff, thus reducing the likelihood of allegations arising. All personnel should adhere to the following principles and action:

- Complete a course in basic awareness in working with Adults at Risk if requested by Greenhouse Sports.
- Where an activity/ action requires consent, this must be from the Adult themselves if they have capacity to do so.
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- If involved in a 1:1 (mentoring) situation, give some thought before the meeting to the venue and environment where the meeting will take place. Avoid private, closed places; instead meet in an open, transparent space. If privacy is needed, make sure that the room/office has windows and is situated in a natural walkway. Always inform a colleague of your meeting.
- Make the experience of your sports programme or session fun and enjoyable: promote fairness, confront and deal positively and pro-actively with bullying, harassment or any other inappropriate behaviour.
- Treat all people equally and with respect and dignity.
- Always put the welfare of the Adult at Risk first.
- Always use the mobile phone and tablet supplied to you by Greenhouse Sports (for further detail on E-safety/use of media - covering safeguarding procedures for photography, video, publishing and on-line work, please refer to the E-safety related policies available via the Greenhouse Sports website).
- Maintain a safe and appropriate distance with players (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with an Adult at Risk or to share a room with them).
- Avoid unnecessary physical contact with an Adult at Risk. Where any form of manual/physical support is required it should be provided openly and with the consent of the Adult. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the Adult's consent has been given.
- In extreme cases where an Adult is becoming a danger either to themselves, to others or to you, physical contact/restraint may be required, however to be judged lawful the force of restraint used must be proportionate to the consequences it is intended to prevent.
- If appropriate, involve parents/carers wherever possible, e.g. where Adults at Risk need to be supervised in changing rooms, encourage parents who have undertaken a *DBS* check to take responsibility for their own son/ daughter. If groups have to be supervised in changing rooms always ensure parents, coaches etc. work in pairs.
- Keep up to date with the technical skills, qualifications and insurance in sport.
- Never transport an Adult unless in an emergency; in this case it is the coach's responsibility to obtain consent from the Adult (if he/she has capacity) or the Adult's parents, carers AND a Centre DSL BEFORE they transport the Adult. In such circumstances, always transport the Adult at Risk in the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.

- Be an excellent role model: this includes not smoking or drinking alcohol in the company of Adults at Risk.
- Always give enthusiastic/ constructive feedback rather than negative criticism.
- Recognise the developmental needs and capacity of the Adult, do not risk sacrificing welfare in the desire for team/personal achievements. Avoid excessive training or competition and pushing them against their will.
- Do not undertake any medical treatment on an Adult, unless qualified to do so. Gain the Adult at Risk'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.
- Keep a written record of any injury that occurs, along with details of any treatment given.
- All participants (outside curricular sessions) must be registered using the Participant Registration Form.
- All staff must seek clarification from their managers regarding the appropriate Risk assessment documents they should use for each activity / site / venue (for further detail please refer to the Health & Safety policy available via the Greenhouse Sports website).

4.6 Coaching/Staff Ratios

4.6.1 All activities/events must comply with the ratios set by the relevant Governing Body. Greenhouse Sports staff will always adhere to these ratios, as well as consult with the appropriate host agency when working in a special educational needs environment or with physically disabled Adults.

4.6.2 A list of Governing Body ratios can be found by liaising with the relevant National Governing Body.

4.7 Medical Treatment

4.7.1

- It is recommended that no Adult should be treated in any situation when on his/her own in a treatment room with the door closed. It is Greenhouse Sport's policy that all treatment procedures should be 'open' i.e. the door remains open, and only undertaken by appropriately qualified members of staff.
- Prior to medical or health treatment being carried out, written consent from the Adult must first have been obtained if they have the capacity to give it and if not, from their parent/ carer unless it is an emergency.
- It is recommended that all treatment procedures are explained fully to the Adult and verbal consent is given before they are carried out.
- It is recommended that, if treating an area of the body which is potentially embarrassing (i.e. the groin), another suitable Adult (ideally a parent/carers), acting as a chaperone, must be present.
- It is important to maintain medical confidentiality and patient dignity at all times.

4.8 Poor Practice

4.8.1 The following should be avoided except in emergencies.

- Do not transport Adults at Risk in your car unless in a medical emergency and even so, permission **MUST WITHOUT FAIL** be obtained from the Adults themselves if they have capacity to consent or parent/ carer **AND** a Centre DSL beforehand. Ideally there should be at least one additional adult to the driver acting as an escort.
- Avoid spending time alone with the Adult away from others.
- If cases arise where these situations are unavoidable they should only occur with the consent of the Adult and the full knowledge of a Centre DSL or appropriate person from the activity/event (and the Adult's parent/ carer if the Adult does not have capacity to consent). For example, an injury requiring hospital treatment, or a parent/ carer fails to arrive to pick up at the end of a session. In all cases, such incidents should always be recorded.

4.8.2 The following are regarded as poor practice and should be avoided by all personnel:

- Engaging in rough, physical or sexually provocative games, including any forms of inappropriate behaviour.
- Use of your personal mobile phone or tablet other than in extreme emergencies.
- Over-friendly behaviour/nature with participants.
- Allowing or engaging in inappropriate touching of any form.
- Allowing inappropriate language to be used unchallenged.
- Making sexually suggestive comments, even in fun.
- Reducing an Adult to tears as a form of control.
- Allowing allegations made to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature that the Adult can do themselves.
- Sharing a room with an Adult at Risk.

4.8.3 If during your care you accidentally hurt an Adult at Risk, they seem distressed in any manner, appear to be sexually aroused by your actions and/or if they misunderstand or misinterpret something you have done, report any such incidents as soon as possible to a Centre DSL, as well as making a written note of it. If appropriate the Centre DSL should then inform the person's parents of the incident.

5. Training

If requested by Greenhouse Sports, all staff working with Adults at Risk must, as a minimum requirement, complete a course in basic awareness. This is in addition to our child specific safeguarding training (details of which can be found in our Safeguarding and Child Protection policy on our website).

6. History

Version	Date	Status	Approved
4	2 nd May	Approved	Operations Committee
4	14 th June	Final approval from the Board, as recommended by Ops Co.	Board of Trustees
5	9 th Nov	Annual review (GC)	SCP sub-co.
6	29 th Sept	Annual Review (GC)	SCP sub-co.

APPENDIX A – Greenhouse Sports Safeguarding Code of Conduct including Adults at Risk

If a concern arises through a phone call, email, letter, conversation or observation, record the information on an Incident Referral Form then immediately tell your Programme Manager or a Centre DSL. Never just ignore it.

All Greenhouse Sports staff, workers and volunteers must adhere to the following good practice guidelines:

Participant Relationship

- Never engage in a personal relationship with a Greenhouse Sports participant, whether a young person or an Adult at Risk.
- Develop an appropriate working relationship with participants, based on mutual trust and respect.
- Maintain a professional relationship at all times, including outside of working hours.

Communication

- When communicating to a young person or Adult at Risk by phone, only ever use your work mobile. Ensure that the conversation/text is only ever regarding your programme and never encourage the recipient to reply back, except when appropriate. In no circumstances should you use your personnel mobile/iPad.
- Do not accept a young person or Adult at Risk as a friend on Facebook or on any other social media site. If you currently have a participant under the age of 18 as a friend on a social media site, please delete them immediately. All social media, including Twitter communication must be undertaken through the official Greenhouse Sports channels.

Transportation

Never transport an Adult at Risk or a young person in your car unless in an emergency; in this case it is your responsibility to contact the individuals parents/ carers AND your line manager BEFORE you transport the individual. For an Adult at Risk this applies if there is any doubt about the Adult's capacity to consent. In such circumstances, always transport the individual in the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.

Health & Safety

- Ensure the safety of all participants by providing effective supervision, proper pre-planning of coaching sessions and using safe methods at all times.
- Consider the wellbeing and safety of participants before the development of performance.
- Administer minor first aid in the presence of others and where required call the Emergency Services
- Have access to a telephone for immediate contact to emergency services if required.

- Establish and address the additional needs of disabled participants or other vulnerable groups.

Behaviour

- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Encourage all participants not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability.
- Do not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour.

Safeguarding Professional Conduct

- Treat all people fairly and ensure they feel valued.
- Appreciate the efforts of all people and do not over-train the participants. Never exert undue influence over performers to obtain personal benefit.
- Be positive, approachable and offer praise to promote the objectives of the Greenhouse Sports at all times.
- Never use sanctions that humiliate or harm.
- Do not abuse members physically, emotionally or sexually.
- Maintain confidentiality about sensitive information.
- Respect and listen to opinions of others.
- Take time to explain rules and techniques to ensure they are clearly understood.
- Create an environment where every individual has the opportunity to participate in a sport in an environment free of fear and harassment.
- Recognise the rights of all participants to be treated with respect and as individuals.
- Be a positive role model for participants at all times and ensure that the environment is as safe as possible, taking into account and minimising any possible Risks.

Sharing Concerns and Recording Incidents

- Do not let any allegations of abuse of any kind or poor practice go unchallenged or unrecorded. Incidents and accidents must be recorded in the line with Greenhouse Sports/school's procedures.
- Report accidents or incidents of alleged abuse or poor practice to the designated person.



Greenhouse Sports is committed to providing a high quality, safe and friendly environment for staff, volunteers, workers and participants and therefore operates a zero-tolerance policy in connection with the above.

I confirm that I have read (i) Part one of Keeping Children Safe in Education (September 2020); (ii) the Safeguarding & Child Protection policy; and (ii) the Safeguarding Adults policy. I agree to comply with these policies and adhere to all the areas of good practice listed above. In addition, I confirm I will inform Greenhouse Sports of any personal/family relationship with a Greenhouse Sports participant.

.....
Signed

.....
Dated

APPENDIX B - Incident Referral Form

Your name:		
Your position in organisation:		
Contact Tel No's: Home:	Mobile:	Work:
Address:		
Email:		
Person's name:		
Address:		
Date of Birth:	Male or female?	
Parent / carers name:		
Does the person have a disability? If so, please detail:		
Date and time of the incident:		
Your observations:		
Exactly what the Adult at Risk says and what you said ((Remember, do not lead the Adult at Risk – record actual details. Continue on separate sheet if necessary)		
Action taken so far:		
Information on the alleged abuser:		

<p>You should refer all concerns immediately by speaking with Greenhouse Sports' DSLs and then sending this form to safeguarding@greenhousesports.org Have you contacted any external agencies yet? If so, please complete below.</p>	
Social services	Name and contact number: Date and time: Details of advice received:
Local Safeguarding Partners	Name and contact number: Date and time: Details of advice received:
Police	Name and contact number: Date and time: Details of advice received:
Local Authority	If yes – which: Name and contact number: Date and time: Details of advice received:
NGB	If yes – which: Name and contact number: Date and time: Details of advice received:
Other	Which: Name and contact number: Details of advice received:
Signature:	
Print name:	Date:

Once completed, please make sure that you then immediately forward it onto to the Designated Safeguarding Lead by emailing safeguarding@greenhousesports.org

APPENDIX C – LEGISLATION & GOVERNMENT INITIATIVES

Sexual Offences Act 2003

<http://www.legislation.gov.uk/ukpga/2003/42/contents>

The Sexual Offences Act introduced a number of new offences concerning vulnerable Adults and children. www.opsi.gov.uk

Mental Capacity Act 2005

<http://www.legislation.gov.uk/ukpga/2005/9/introduction>

Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and there should be least restrictive intervention. www.dca.gov.uk

Safeguarding Vulnerable Groups Act 2006

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

Introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority. The Act places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance. www.opsi.gov.uk

Deprivation of Liberty Safeguards

<https://www.gov.uk/government/collections/dh-mental-capacity-act-2005-deprivation-of-liberty-safeguards>

Introduced into the Mental Capacity Act 2005 and came into force in April 2009. Designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm.

Disclosure & Barring Service 2013

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Criminal record checks: guidance for employers - How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS). www.gov.uk/dbs-update-service

The Care Act 2014 – statutory guidance

<http://www.legislation.gov.uk/ukpga/2014/23/introduction/enacted>

The Care Act introduces new responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

APPENDIX D – USEFUL CONTACTS

Useful contacts

Westminster Council

Telephone: 020 7641 4000

Out of hours: 020 7641 6000

Email: adultsocialcare@westminster.gov.uk

Ann Craft Trust - Safeguarding Adults in Sport and Activity:

Website: www.anncrafttrust.org

Email: Ann-Craft-Trust@nottingham.ac.uk

Telephone: 0115 951 5400

GREENHOUSE SPORTS DESIGNATED SAFEGUARDING TEAM

The Greenhouse Sports Designated Safeguarding Team is currently:

Designated Safeguarding Lead (**DSL**) – Chris Allbut; Adam Whale

Designated Safeguarding Leads for the Centre* safeguarding: Jason Sugrue, Daniel Basterfield & Maria Ingles (together the '**Centre DSLs**')

Deputy Designated Safeguarding Leads (**DDSLs**) Richard Joyce, Deputy Director of Programmes and Delivery Managers Sarah Louis and Kiri Madhani

*The Greenhouse Centre, at 35 Cosway Street, London NW1 5NS (the 'Centre').

If you cannot contact any of the above, in an emergency, please contact the duty officer at the Centre.

APPENDIX E Additional forms of abuse

If you have a concern about a particular Adult at Risk you must follow normal safeguarding procedures as set out in the Greenhouse Sports Safeguarding Adults Policy (see clause 3.4, Reporting the concern).

'Honour based' violence

So-called 'honour based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and /or community, including Female Genital Mutilation, forced marriage and practices such as breast ironing. All forms of so called HBV are abuse, regardless of the motivation and should be handled and escalated as such. We need to be alert to the possibility of an individual being at Risk of HBV, or already have suffered HBV.

Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or other forms of coercion are used to cause a person to enter into a marriage.

Radicalisation and the Prevent duty

What is the Prevent duty?

Under section 26 of the Counter-Terrorism and Security Act 2015, there is a duty to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

What does it mean?

It is essential that staff are able to identify those who may be vulnerable to radicalisation and know what to do when they are identified. Protecting them from the risk of radicalisation should be seen as part of wider safeguarding duties and is similar to protecting from other harms (e.g. drugs, gangs, neglect, sexual exploitation).

How to assess the Risk of radicalisation

- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding Risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection.
- Adults at Risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying those who might be at Risk of radicalisation and act proportionately.
- The Prevent duty does not require unnecessary intrusion into family life but as with any other safeguarding Risk, action must be taken when behaviour of concern is observed.
- General safeguarding principles apply to keeping children safe from the Risk of radicalisation.

Peer on Peer abuse

Greenhouse Sports staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include bullying, cyber bullying, gender-based violence/ sexual assaults and sexting. Abuse should never be tolerated or passed off as 'banter'.

Allegations made against participants by their peer(s) are likely to be considered a safeguarding matter when the allegation:

- is made against an older participant and refers to their behaviour towards a younger or more vulnerable participant
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other participants
- indicates that other participants may have been affected by this participant

Incidents of peer on peer abuse will be investigated and dealt with in accordance with Greenhouse Sports' safeguarding policy and procedures.

Homelessness

Any concerns over homelessness should be raised as early as possible with the Greenhouse Sports Designated Safeguarding Team. The Team will be aware of the contact details and referral routes into the Local Housing Authority

Indicators that an individual or family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"

Serious violence

The indicators which may signal an individual is at risk from, or is involved with, serious violent crime include, but are not limited to, the following:

- A change in friendships
- New relationships with individuals or groups
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

Some of the most significant risk factors that could increase vulnerability to becoming involved in serious violent crime include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

“Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion activated camera.

Upskirting will not be tolerated. Any incidents of upskirting will be reported in accordance with this policy and a decision will then be made on the next steps to take, which may include police involvement.

Action required

As explained above, if you have a concern about a particular individual you should follow normal safeguarding procedures as set out in the Greenhouse Sports Safeguarding Adults Policy (see clause 3.4, Reporting the concern).