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Safeguarding Policy

1.0 SCOPE AND PURPOSE

1.1 BU Community Business Limited (BUCB) is committed to the safeguarding of children and vulnerable adults in so far as they are engaged in activities at, or related to, Chapel Gate.

1.2 This Policy sets out BUCB's approach to preventing and reducing harm to children and vulnerable adults. It also highlights the procedure that anyone should follow if they suspect a child or vulnerable adult is experiencing, or at risk of experiencing, harm.

1.3 This Policy aims to:

- Promote and prioritise the safety and wellbeing of children and vulnerable adults;
- Provide assurance to parents, guardians and carers of site users, users of the site, BUCB's Directors and other parties that BUCB takes reasonable steps to manage risks and keep children and vulnerable adults safe;
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information and support on safeguarding matters;
- Ensure that appropriate action is taken in the event of any allegations or suspicions received by BUCB regarding harm to children or vulnerable adults taking place at, or related to, the Chapel Gate site.
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

1.4 BUCB cannot accept responsibility for ensuring the welfare of children (individuals under the age of 18) or vulnerable adults who are present on Chapel Gate premises without its knowledge or consent. Therefore, parents, guardians, schools or groups (including sports teams) who bring their children onto Chapel Gate must take responsibility for their safety and welfare and ensure that their children do not disturb others or damage BUCB property.

1.5 This Policy applies to all members of the BUCB community including staff and students of BU, contractors, Board members, sections, site users and volunteers who may be in contact with children and vulnerable adults whom BUCB encounters through its sporting facilities and on site activities and through its operation of the site.

2.0 KEY RESPONSIBILITIES

2.1 Overall responsibility for Safeguarding is managed by BU on behalf of BUCB. Strategic responsibility lies with the BU Director of Students Services, and day to day management is the responsibility of the BU Head of Sport and Culture, delegated to the Chapel Gate General Manager.

2.2 The BU Head of Student Support and Wellbeing is available to offer support to anyone with a safeguarding concern and will also act as liaison between the police or other statutory services and BUCB should a safeguarding issue arise.

2.3 It is the responsibility of the Social Services and/or the police to investigate safeguarding concerns; however, a BU responsible person¹, on behalf of BUCB, will undertake a risk assessment of any reports it receives of possible safeguarding concerns before making a referral to any external agency.

3.0 PROCESS

3.1 *Sports clubs with national governing body affiliation*

All official sports clubs must comply with the rules of their national governing body. This will include following their process for carrying out safeguarding risk assessments and reporting any issues of concern that may arise with club members. It is the responsibility of the club safeguarding lead to ensure that all issues of concern are notified to their national governing body in accordance with due process. Should a safeguarding issue arise within the club that relates to activity at Chapel Gate, the Chapel Gate General Manager² must also be informed and kept updated with any investigations in accordance with the process flowchart at Appendix 1.

3.2 *Sports clubs without national governing body affiliation*

Sports clubs who do not have a national governing body affiliation should raise issues of concern direct with the local authority the child or vulnerable adult resides in. Should a safeguarding issue arise within the club that relates to activity at Chapel Gate, the Chapel Gate General Manager³ must also be informed and kept updated with any investigations in accordance with the process flowchart at Appendix 1.

3.3 BU, on behalf of BUCB, will carry out an annual Safeguarding review to ensure that any potential safeguarding risks in relation to the use of Chapel Gate general have been assessed and any relevant actions are put in place.

3.4 All site users with an ongoing arrangement for the hire of Chapel Gate will be required to provide the Chapel Gate General Manager⁴ with a copy of their Safeguarding Policy and risk assessment annually and on renewal of any agreement.

3.5 It is the responsibility of the visiting individuals, groups or teams to carry out a safeguarding risk assessment relating to their intended use of the facility.

4.0 DEFINITIONS

4.1 Throughout this Policy the following definitions are used

a) Vulnerable

A situation where a child or adult is at risk of exploitation, harm or abuse, including the risk of radicalisation. While the definition of “vulnerable adult” and “child” are set out below, a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation.

¹ Director of Student Services, Head of Student Support and Wellbeing, Head of Sport and Culture. In the absence of any of these named individuals the decision may be delegated to any member of the Student Services Executive team.

² If the Chapel Gate General Manager is not available, or the concern involves this person, the concern should be raised with the Head of Sport and Culture or the Director of BU Student Services.

³ See footnote 2.

⁴ See footnote 2.

b) Vulnerable Adult

A person over 18 who is, or may be in need of, community care or health care services by reason of mental or other disability or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation (including risk of radicalisation or being drawn into terrorism).

c) Child

A person who is under the age of 18. Those aged 16 to 18 are generally referred to as 'young people' rather than 'children' but that does not impact on their status for the purposes of this Policy.

d) Vulnerable Group

The generic term that includes children and vulnerable adults.

e) Abuse

Abuse includes:

- physical abuse, including hitting, slapping, pushing, kicking, or inappropriate sanctions;
- sexual abuse, including encouraging relevant individuals to look at pornography, harassing them by making sexual suggestions or comments, or sexual acts where the individual has not consented, or could not consent or was pressured into consenting;
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating;
- financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- discriminatory abuse, including racist, sexist, that is based on a person's disability, and other forms of harassment, slurs or similar treatment; and
- exploitation including encouraging others to engage in acts of terrorism, modern slavery and human trafficking or being controlled by another person or group.

5.0 GUIDELINES ON RISK ASSESSMENT IN RELATION TO SAFEGUARDING VULNERABLE GROUPS

5.1 Before embarking on any activity at Chapel Gate that may involve contact with members of a vulnerable group, it is advisable for a risk assessment to be conducted, part of which should cover safeguarding issues. The person responsible for the activity should undertake the risk assessment which, as well as identifying risks to be mitigated or removed, also provides an opportunity to consider and identify alternative working practices. There are no fixed rules on how a risk assessment should be carried out, although the following general principles should apply:

- a) Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups. This is designed to help you identify the context within which the risks should be managed. Identifying the different types of contact that individuals may have with these

groups should lead to consideration of where you might seek to minimise occasions where a single adult is in the company of a lone child, or adult in a vulnerable situation and where there is little or no possibility of the activity being supervised or observed by others. For this purpose, the terms 'frequently' and 'intensively' relate to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.

- b) Identify any potential risk areas and detail action to prevent the risk occurring. Once you have identified the risks you should consider how they might be mitigated or removed. For example, situations where there is only one individual with a lone child or adult in a vulnerable situation should be avoided where practical. This part of the process may involve consideration of alternative working practice. For example, if there is only one child or vulnerable adult left after a sport session, wait together in a public area until the child or vulnerable adult are ready to depart. Where such instances cannot be avoided, another responsible adult should be informed that they are taking place and wherever possible ensure that more than one adult is present.
- c) Identify any situations where a Disclosure and Barring Service (DBS) check might be required. The online eligibility checker at <https://www.gov.uk/government/collections/dbs-eligibility-guidance> can be used to determine whether an activity would require DBS checks to be undertaken for those involved.

6.0 PROCEDURE FOR RAISING CONCERNS

- 6.1 The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect individuals against unfounded accusations. Examples of the type of situations which may apply to this policy and procedure may include where:
 - a child or adult raises an allegation of abuse, harm or other inappropriate behaviour;
 - an individual discloses information involving themselves or family members which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals;
 - there are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation);
 - there are observable changes in a child or adult's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation);
 - a child or vulnerable adult becomes unduly distressed or angry;
 - a concern is raised that an individual presents a risk of abuse or harm towards a child or adult in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material;
 - concerns arise that an individual has given cause for concern that they are vulnerable to radicalisation and there is an identifiable risk of them being drawn into terrorism.
- 6.2 BUCB will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly and in line with this procedure and data protection legislation.
- 6.3 It is the remit of Social Services and/or the police to investigate safeguarding concerns; however BUCB will undertake a risk assessment to inform any proposed referral to such an external agency.

- 6.4 If a safeguarding concern related to Chapel Gate is raised out of hours, please phone the police to report the concern and inform the General Manager of Chapel Gate⁵ the following working day.
- 6.5 If you believe a child or vulnerable adult is in immediate danger, please phone the police.
- 6.6 Where a team, club or other body have a Welfare Officer, any concern or disclosure should be raised with the relevant Welfare Officer or other suitable individual. It will be this person's responsibility to liaise with the General Manager of Chapel Gate.⁶
- 6.7 On receipt of concerns raised, the General Manager of Chapel Gate in conjunction with a BU responsible person (normally the Head of Student Support and Wellbeing) will conduct a risk assessment and determine what action, if any, must be taken on behalf of BUCB. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the DBS as required.
- 6.8 The investigation of an issue or disclosure will usually be conducted and concluded within 5 working days of the original communication. Any extension of this period of investigation will be communicated at the earliest point possible.
- 6.9 Any key information relating to the issue will be communicated as quickly as possible with the relevant individuals in line with any confidentiality considerations.
- 6.10 If the BU responsible person deems the risk such that the issue should be raised externally, they will be the main point of contact for the relevant external agency(ies). Any persons who are involved in a disclosure of any kind may feel that they need to speak to a professional for reassurance. The NSPCC operate a 24 hour help line for anyone concerned about a child or young person. It is primarily for use by adults and can be used anonymously: 0800 800600.

7 REFERRAL TO THE CHARITY COMMISSION/PRINCIPAL REGULATOR

- 7.1 In line with the Charity Commission Guidance on Reporting Serious Incidents BU has a duty to report serious incidents of abuse or mistreatment of vulnerable beneficiaries to the Charity Commission, This requirement includes incidents that have occurred involving BUCB, as a wholly owned subsidiary of BU, where the incident is likely to have a significant impact on BU, its operations, finances, people and/or reputation. As BU is an exempt charity these reports must be made in the first instance to BU's principal regulator. The principal regulator for BU is the Office for Students (OfS). This reporting will be done via the Clerk to the Board and reportable incidents must be notified to the Audit, Risk and Governance Committee of the Board by the Chief Operating Officer.

8 INFORMATION SHARING AND CONFIDENTIALITY

- 8.1 Where appropriate, safeguarding information will be shared on behalf of BUCB with the consent of the subject of the information. In some circumstances however, it may not be appropriate to seek consent before sharing information with others and / or information can be shared where consent has been refused. Examples of this are where failure to share would: 1. Place the child or vulnerable adult or others at increased risk of significant harm; or

⁵ See footnote 2.

⁶ See footnote 2.

2. Undermine the prevention, detection or prosecution of a serious crime (i.e. any crime which causes or is likely to cause significant harm to a child or to an adult) including where seeking consent might lead to interference with any potential criminal investigation.

8.2 For more information on data sharing at BU please see our [Data Protection and Privacy pages](#).

9 MEDIA CONSIDERATIONS

9.1 It should be noted that Chapel Gate is open to all members of the public. We would therefore ask each team to remain vigilant in accordance with your club and/or National Governing Body (NGB) safeguarding policy in relation to the recording of any sporting performance (match or training).

9.2 Any concerns should be processed in accordance with section 6 above.

9.3 For further assistance, please visit:

<https://thecpsu.org.uk/help-advice/topics/photography/>

<https://thecpsu.org.uk/help-advice/topics/online-safety/>

9.4 As social networking develops, it is key to ensure that use is monitored to ensure that children and vulnerable adults do not become a target for abuse or harm. We would therefore ask each team to remain vigilant in accordance with your club/NGB safeguarding policy in relation to the use of social networks for communication or marketing purposes.

9.5 Any concerns should be processed in accordance section 6 above.

9.6 For further assistance, please visit:

<https://thecpsu.org.uk/resource-library/?topic=1104>

<http://www.thinkuknow.co.uk/>

10 USEFUL INFORMATION

- Details about:

- LADO (Local Authority Designated Officer) are available at: <https://www.bournemouth.gov.uk/ChildrenEducation/ChildrensSocialCare/BournemouthAndPooleLocalSafeguardingChildrenBoard.aspx>.
- The Multi Agency Safeguarding Hub are available at: <https://pdscp.co.uk/>.

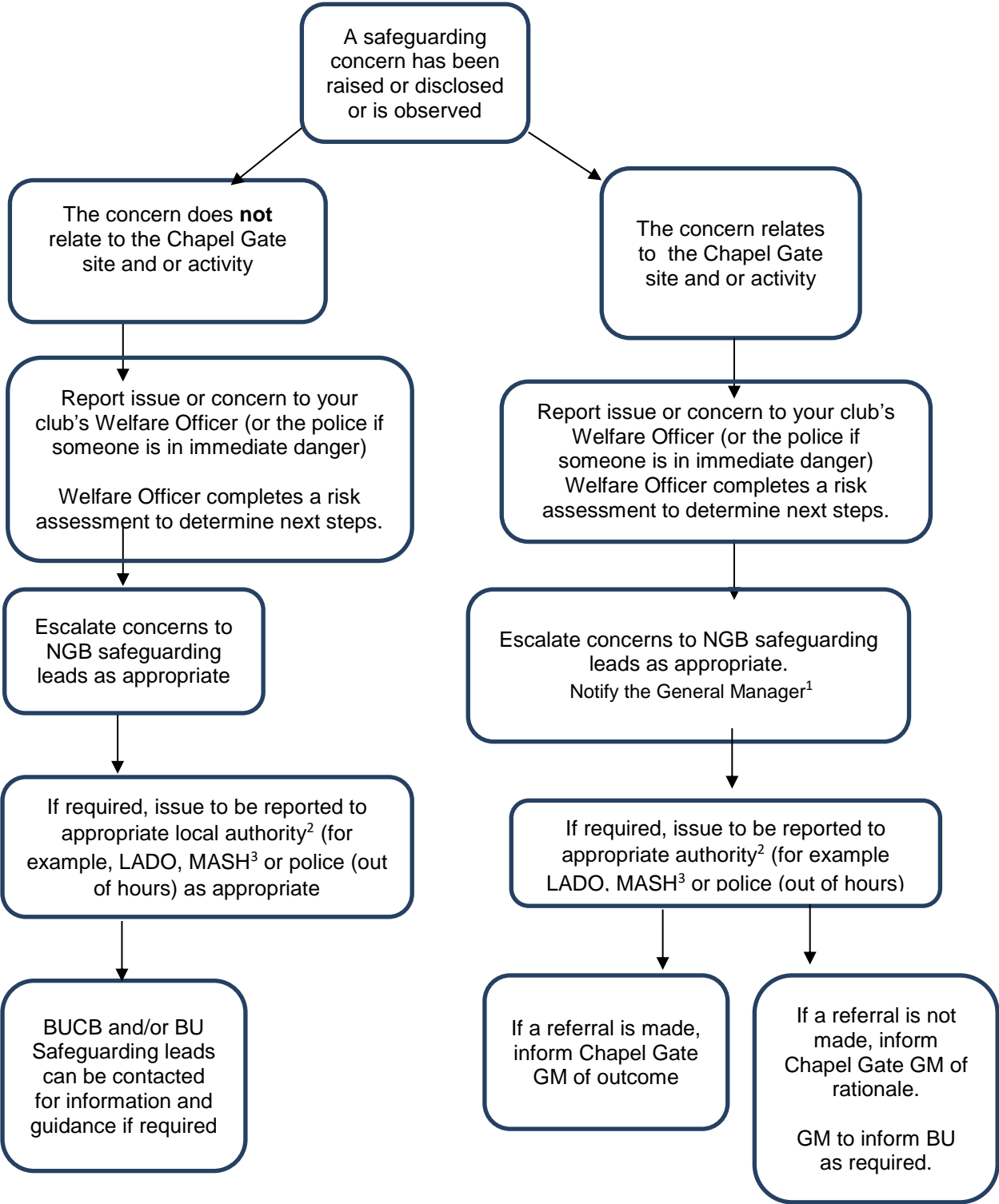
- Childline provides an accessible source of support for children and information about this service is readily available from <https://childline.org.uk/>.

- For those in safeguarding positions, further information can be found at <https://thecpsu.org.uk/help-advice/deal-with-a-concern-who-can-support-you>.

11 APPENDICES

Appendix 1 – SUGGESTED REPORTING FLOWCHART FOR CLUBS

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1. If the Chapel Gate General Manager is not available or the concern involves this person, the concern should be raised with the Director of BU Student Services.
2. Contact your local safeguarding partnership or board to find out how to report a concern.
3. The Multi Agency Safeguarding Hub (see <https://pdscp.co.uk/> for the Dorset reporting details).