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HR-16 – Safeguarding Children & Vulnerable Adults Policy

Gloucester Rugby

Updated: 01 September 2020

FOREWORD

Gloucester Rugby strives to provide the highest standards of care for children and vulnerable adults in a safe and enjoyable rugby related environment. Our safeguarding core values are teamwork, respect, enjoyment, discipline and sportsmanship.

Children are the future of our sport. It is important that we help them to acquire rugby union's values from an early age and set the highest standards as role models, while ensuring their safety and wellbeing.

Everyone working with boys, girls and vulnerable adults is in a position of trust, influence and responsibility by virtue of their position in our sport and must always act in the best interest of those children or vulnerable adults.

It is recognised that some people use their position within sport and youth organisations to gain access to children or vulnerable adults, win their trust and then abuse it for inappropriate or illegal purposes. We are all responsible for policing the rugby environment and ensuring that anyone in our sport seeking to abuse their position of trust are identified, is deterred and punished.

This policy and guidance sets out how the organisation and individuals should work together to safeguard and promote the welfare of children and vulnerable adults in accordance with the Children Acts, 1989 & 2004, and the Safeguarding Vulnerable Groups Act, 2006. It is important that all those delivering a safe rugby environment fully understand their responsibilities.

This policy attempts to achieve a balance between establishing sufficient control to minimise the risk of abuse to children and vulnerable adults, while not over burdening the willing volunteer. It includes the mandatory legal requirements, and also highlights signs which should raise suspicions of abuse as well as practices which should be avoided, in the best interests of children, vulnerable adults and those responsible for their wellbeing.

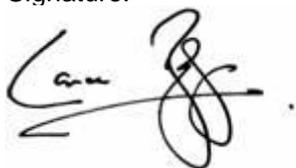
POLICY STATEMENT

Gloucester Rugby (hereafter known as GR) is committed to safeguarding the welfare of children and vulnerable adults in the sport. All children and vulnerable adults are entitled to protection from harm and have the right to take part in sport in a safe, positive and enjoyable environment.

The key principles on which this policy statement are based:

- a. The welfare of the child or vulnerable adult is paramount;
- b. All participants regardless of age, gender, ability or disability, race, faith, size, language or sexual identity, have the right to protection from harm;
- c. All allegations and suspicions of harm will be taken seriously and responded to swiftly, fairly and appropriately;
- d. Everyone will work in partnership to promote the welfare, health and development of children and vulnerable adults
- e. The interests of those who work or volunteer with children and vulnerable adults will be protected.

Signature:



Print Name: Lance Bradley

Appointment: Gloucester Rugby

Dated: 01 September 2020

ABBREVIATIONS

CRB - Criminal Records Bureau

CSO - Club Safeguarding Officer
Dept - Department
GR - Gloucester Rugby
RFU - Rugby Football Union

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REFERENCE

	Document	Link
A	RFU Safeguarding Toolkit	http://www.rfu.com/ManagingRugby/SafeguardingChildren/-/media/Files/2012/ManagingRugby/SafeguardingToolkit4.ashx
B	Safeguarding Children and Vulnerable Adults in Rugby Union Policy & Guidance	http://www.rfu.com/ManagingRugby/SafeguardingChildren/-/media/Files/2011/ManagingRugby/SafeguardingChildren/SafeguardingChildrenPolicyGuidance140611Printable.ashx
C	Touring with Children and Vulnerable Adults	http://www.rfu.com/ManagingRugby/SafeguardingChildren/-/media/Files/2012/ManagingRugby/tour%20Guidance4.ashx
D	GR Community & Gloucester Rugby Foundation Programme Coach Guidance and Child Protection Plan	

SECTION 1 - CHILDREN AND VULNERABLE ADULTS

1. Everyone shares responsibility for safeguarding and promoting the welfare of children and young people, irrespective of individual roles. Nevertheless, in order that organisations and practitioners collaborate effectively, it is vital that all partners who work with children – including local authorities, the police, the health service, the courts, professionals, the voluntary sector and individual members of local communities are aware of, and appreciate, the role that each of them play in this area. This includes Gloucester Rugby (GR) staff who are regularly involved

Defining Children

2. Children are defined in the Children Act 2004 as people under the age of 18 years. For the purposes of this Policy the legal definition applies.

Male 17 Year Olds Playing the Adult Game

3. This Policy covers all players under 18. However, in accordance with RFU Regulation 15, a male player can, with the necessary written consent, play in the adult game when he reaches his 17th birthday, although not play in a front row position until his 18th birthday. The only exception is players within the Elite England Rugby performance pathway, whose playing development is managed through the England National Academy.
4. A club's management team must have assessed and continue to assess, that any 17 year old player playing in adult games or training is both physically, emotionally and intellectually capable of taking part.
5. Those responsible for the management of adult teams which include 17 year olds, must at all times be mindful of their safety and wellbeing and ensure that a suitable adult from within the team and management acts as a mentor or buddy.
6. If a 17 year old is playing rugby under Regulation 15.1.4.4, while playing or training with the adults he is treated as an adult and the detail of this policy does not apply.
7. However, as soon as he is out of that environment the player is once again a child and thus the policies and legislation regarding children apply. This section does not apply to the women's game where female players may only play in the adult game from their 18th birthday.

Academy

8. Players may be asked to train with an older age group as part of their rugby development. This will be a Gloucester England Rugby Academy (GERA) decision based on their current physical make up, technical/tactical ability and or mental maturity. The GERA must gain parental permission and notify the school/college of their decision to do so.
9. Players may be asked to play for the age group above during Academy organised fixtures as part of their rugby development. This will be a GERA decision based on their current physical make up, technical/tactical ability or mental maturity. The GERA must gain parental permission and notify the school/college. If the player has been asked to play in any of the front row positions then the GERA must gain parental permission, School/College permission along with the local constituent body, Gloucestershire Rugby Football Union having the final sign off as to whether the individual is eligible to play the fixture.

Defining Vulnerable Adults

10. Vulnerable adults are defined in the Safeguarding Vulnerable Groups Act 2006 as someone 18 years or older who has:
 - a. A dependency upon others, or a requirement for assistance from others, in the performance of basic physical functions;
 - b. Severe impairment in their ability to communicate with others;
 - c. An impairment in their ability to protect themselves from assault, abuse or neglect;
 - d. Has been detained in lawful custody or is being supervised as a result of a court order.

11. Whilst this Policy refers to both children and vulnerable adults throughout, there are instances in which the management, both internally and externally, of concerns and incidents involving vulnerable adults may vary slightly from those involving children. In particular, and in contrast to the situation when dealing with children, it is essential to obtain a vulnerable adult's consent (where possible) before referring the matter to any of the statutory agencies. See the Safeguarding Children and Vulnerable Adults in Rugby Union Policy for further advice and guidance.

SECTION 2 - GR SAFEGUARDING STRUCTURE

1. In order to operate within the legal and regulatory framework, the RFU, its Constituent Bodies and member clubs will work together, each with a clear role, in order to safeguard children and vulnerable adults. See Safeguarding Children and Vulnerable Adults in Rugby Union Policy & Guidance.
2. The GR Chief Executive Officer will have overall responsibility for ensuring that GR procedures outlined in this Policy link with the RFU Safeguarding Policy and, when appropriate, work closely with Local Authority and other agencies regarding Safeguarding protocols. The CEO will appoint a Club Safeguarding Officer (CSO), ensure that required staff are Disclosure and Barring Service (DBS) checked and awareness/training needs are identified and implemented. A Department (Dept) assessment has been carried out to identify Safeguarding requirements and is shown at Table 1 below.

Table 1 - GR Department Safeguarding Risk Assessment

Activity	Assessment
Playing Department*	Although some players will be invited to attend school liaison visits, these activities are supervised by the GR Community Dept and GR Commercial Dept and/or Local Authority Education staff. Players and coaching staff do not have 'regular' contact with children or vulnerable adults. It is therefore concluded that a Safeguarding Officer does not need to be appointed and players/coaching staff do not require DBS checks. The GR Rugby Operations Manager will be a point of contact for the CSO.
Academy Department	Members of the full time Academy staff have 'regular' contact with children during training programmes and fixtures. Full time Academy staff will have a DBS enhanced check within 3 months of starting employment. Staff will attend RFU Safeguarding courses and receive Safeguarding material directly from the RFU as part of the Academy Development. Occasional Academy staff have infrequent contact with children whilst representing GR and therefore a DBS check is not required but individuals must have a DBS check with their community club or school. A copy will be kept on file within the Academy office. These staff will receive Safeguarding material directly from the RFU and Academy Safeguarding Officer (ASO). The Academy Manager will appoint a full time member of staff to work as 'Academy Safeguarding Officer ASO' who will be the first port of call for any safeguarding issues within the Academy who will then report directly to the Club Safeguarding Officer (CSO).
Community Department & Foundation	Members of the GR Community Dept and GR Foundation have 'regular' contact with children for liaison school visits and Kingsholm tours. This contact regularly involves training. It has been best practice that all Community staff are subject to 'Enhanced' DBS checks, attend the RFU Safeguarding and Protecting Young People in Rugby Union course within 6 months of employment and has an appointed Community Department Safeguarding Officer (CDSO). Community Staff also work within the requirements of GR Community Department Coach Guidance and Child Protection Plan
Commercial Department*	Members of the Commercial Dept will not have regular contact with children or vulnerable adults, therefore staff do not need to be DBS checked. The Commercial Manager will be a point of contact for the CSO.
Match Day Operation*	All stewards are issued with an Operational Brief for dealing with children and vulnerable adults. The corporate area SIA Security Stewards are DBS checked and have attended safeguarding training. All children, vulnerable adults and those with special needs will be accompanied by an appropriate adult. Any issues involving children and vulnerable adults will be reported to Match Control and response co-ordinated by the Operations Manager. The Operations Manager will be a point of contact for the CSO.

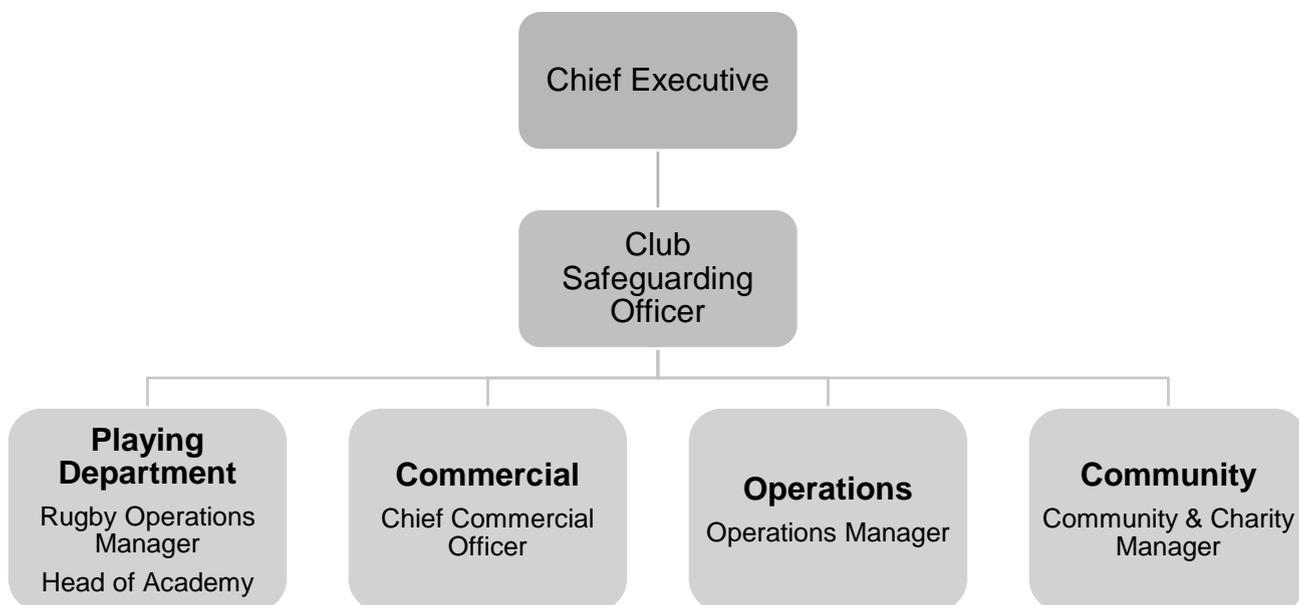
*Although these areas have been assessed as not requiring a CSO or personnel to be DBS checked, staff will be made aware of safeguarding issues/procedures by posters, leaflets and awareness of this policy.

**See Section 3 relating to an explanation for 'regular' contact regarding assessing the requirement for conducting DBS checks.

Responsible Person

3. The Chief Executive will appoint a Club Safeguarding Officer (CSO). In his/her absence, an appropriate deputy will be the first point of contact for safeguarding/welfare concerns. The CSO will:
 - a. Work closely with the CEO to make safeguarding a priority at the proper level and works in accordance with RFU Safeguarding Policy's.
 - b. Develop Safeguarding training plan ensuring that, as a minimum, he/she attends a CSO Workshop within six months of taking up the post and that appropriate age groups has at least one person who has attended the RFU Safeguarding and Protecting Young People in Rugby Union course
 - c. Inform all members, parents and children when a new CSO is appointed;
 - d. Publish the GR Safeguarding Policy/procedures and make it accessible to appropriate staff;
 - e. Ensure all GR staff are aware of their safeguarding responsibilities ;
 - f. Attend any youth disciplinary panel to supports the child and ensures the panel considers the child's emotional wellbeing throughout;
 - g. Identify any signs of harm and reports them directly to the CEO or, in his absence, appropriate director or senior manager;
 - h. All GR staff the Best Practice Guidance;
 - i. Ensure that the GR volunteer and paid workforce is appropriately vetted.
4. Organisation Chart 1 shows the Safeguarding Management Structure for direct management and the provision of guidance and support by the CSO:

Organisation Chart 1 - GR Internal Safeguarding Management Structure



SECTION 3 - RECRUITMENT AND VETTING

1. Children and vulnerable adults are entitled to participate in rugby activities in a safe and welcoming environment. Whilst anyone has the potential to abuse children or vulnerable adults, safe recruitment procedures will enable GR to reduce this risk. When recruiting employees or volunteers all reasonable steps will be taken to ensure only suitable people are selected.

Mandatory Vetting of Volunteers and Employees

2. Adults working with children and vulnerable adults in a voluntary or paid capacity must have an Enhanced DBS disclosure processed and risk assessed by the CSO. See Table 1 in Section 1.
3. The DBS is an executive agency of the Home Office which helps organisations to make safer recruitment decisions. It is responsible for processing requests for criminal records checks, deciding whether it is appropriate for a person to be placed on or removed from a barred list, placing or removing people from the DBS children's barred list and adults barred list for England, Wales and Northern Ireland.
4. Before working unsupervised with children or vulnerable adults, DBS clearance is essential and vetting through DBS application must be undertaken in accordance with RFU Regulations. DBS certificates will be cleared or investigated by the RFU as appropriate. Applications must be submitted within four weeks of taking up a role and must be renewed by the CSO every three years.
5. GR does not accept DBS clearance obtained through any other organisation.
6. The CSO will regularly assess which staff and volunteers need to apply for DBS clearance and can be consulted for guidance on this issue.
7. The criminal record checking service allows employers to access the criminal record history of people working, or seeking to work in certain positions, especially those that involve working with vulnerable groups. The DBS was established under the Protection of Freedoms Act 2012 and started operating on 1 December 2012. It carries out the functions previously undertaken by the Criminal Records Bureau (CRB) for England and Wales and the Independent Safeguarding Authority (ISA) for England, Wales and Northern Ireland. Safeguarding legislation applies as follows:
 - a. It is a criminal offence for a barred person to work or volunteer in Regulated Activity, or to seek or offer to do so;
 - b. It is a criminal offence to knowingly allow a barred person to work or volunteer in Regulated Activity. The maximum penalty for either of these offences is up to five years in prison, or a fine, or both, to be decided by the court;
 - c. If you dismiss a member of staff or volunteer because they have harmed a child or vulnerable adult, or you would have done so if they had not left, you must tell the RFU, who have a legal duty to notify the Independent Safeguarding Authority.
8. Regulated Activity is where a person aged 16 or over is, on a frequent (once a week or more often), or intensive (four days or more in any 30 day period) or overnight (between 2am and 6am) basis, deployed to work with children or vulnerable adults. It also includes roles managing or supervising, on a regular basis, the work of those carrying out these activities.]
9. For further help and guidance: visit www.rfu.com/ManagingRugby or contact the RFU Safeguarding Team on 0208 831 7454

SECTION 4 - BEST PRACTICE

1. While remembering that it is the safety and welfare of children and vulnerable adults that is of paramount importance, there will be times when those responsible will need to exercise discretion and common sense to ensure their wellbeing. This guidance is designed to provide information on a number of different topics which the CSO and staff may find useful with creating a safe, friendly and welcoming environments for children and vulnerable adults.

Safe Environments

2. A safe environment is one where the possibility of abuse is openly acknowledged, volunteers and employees are vetted and trained and those who report suspicions and concerns are confident that these will be treated seriously and confidentially.
3. Communication is central to maintaining a safe environment; this includes information given to parents at the start of the season (such as the CSO's name), choosing the correct and appropriate method of providing information to children and vulnerable adults (email/phone to parents), listening to children's views on matters which affect them, as well as considering how to communicate in an emergency (mobile/landline).
4. Messages relating to children, sent via telephone, emails and texts, should be through their parents/guardians. Where appropriate older players may be copied in but this should always be done by blind copying in order to protect their data. Direct personal communication with children should always be avoided, unless in exceptional circumstances.

Recruitment

5. All reasonable steps will be taken to exclude paid and/or volunteer staff who may pose a threat to children or vulnerable adults. When recruiting new volunteers, GR will consider asking anyone unknown to the organisation to provide a written reference, which will be verified.

Training

6. All adults who have a coaching role should attend an appropriate Rugby Union Coaching Award course and an RFU Safeguarding and Protecting Young People in Rugby Union training course.
7. The GR Safeguarding Officer and members of the Playing, Academy and Community Dept will, within six months of being appointed, attend the RFU Club Safeguarding Officers Workshop, which covers their role and responsibilities. Failure to attend means they may not be permitted to continue in the role. The behavior and performance of new volunteers and employees should be monitored for a period to ensure they are using best practice.

Supervision

8. To provide a safe environment, clubs should ensure that their volunteers and employees when working with children or vulnerable adults avoid working in isolation out of the sight of parents or other volunteers. Whilst volunteers and employees are awaiting their DBS disclosure they will be supervised by someone who does have DBS clearance.
9. Contingency planning should ensure that if a player's injury requires significant attention, or coaches are absent or away with a team, levels of supervision can be maintained by suitably vetted individuals. However, in an emergency, the first attention must be paid to an injured player and if there are insufficient suitably vetted people available to supervise the remaining players, clearly, responsible adults will need to be asked to step in.

Adult: Child Ratios

10. There should always be more than one suitably vetted adult in charge of any group of children or vulnerable adults. The RFU recommends a minimum ratio of:
 - a. 1:10 for children over 8 years old or vulnerable adults;
 - b. 1:8 for children under 8 years old;
 - c. 1:6 for children under 7 years old.

On Tour

11. These Policy guidelines apply equally on any GR tours. When on tour if an adult is solely there supporting their own child they will not need DBS clearance but they will if they are acting in any official capacity with other children. This would apply to those on bedtime or other supervisory duties.
12. Tour planning for a group of vulnerable adults will include a thorough risk assessment to apply a suitable ratio based on the individuals and their companions/carers within the tour party. For more detailed guidance please read the Club Safeguarding Toolkit and Tour guidelines .

Inappropriate Relationships with Children or Vulnerable Adults

13. An adult in a position of trust must not enter into a sexual relationship with a child in their care. Sexual intercourse, sexual activity, or inappropriate touching by an adult with a child under the age of 16 years is a criminal offence, even where there is apparent consent from the child.
14. A consensual sexual relationship between an adult in a position of trust and a child over 16 years of age, or a vulnerable adult, is a breach of trust and an abuse of the adult's position. Whilst it may not be a criminal offence, in a rugby union setting it will be treated very seriously and may result in disciplinary action, including suspension from GR.
15. GR has a legal duty to refer anyone removed from Regulated Activity to the DBS. Therefore, an adult in a position of trust involved in a consensual sexual relationship with a child over 16 years of age, or a vulnerable adult, may be referred to the DBS for consideration . This could result in the adult being barred from working with children or vulnerable adults by the DBS.
16. No-one in a position of trust should encourage a physical or emotionally dependent relationship to develop between them and a child or vulnerable adult in their care; this is often referred to as grooming. Adults must never send children or vulnerable adults inappropriate or sexually provocative messages or images by text, or other electronic media.

Safeguarding Disabled Children & Vulnerable Adults

17. Disabled children and adults and their families may need additional information, help and support . GR staff and volunteer workforce may require training and advice to ensure they include and safeguard them.
18. Some children and vulnerable adults may be more susceptible to harm than other participants because they may: lack the mutual support and protection of a peer group, require higher degrees of physical care and support, have limited communication skills, find it difficult to resist inappropriate interventions, have several carers making it difficult to identify an abuser, have a history of having limited or no choice or have a degree of dependency on a carer conflicting with the need to report harm or raise concerns.
19. For disabled children, the GR recognises the guidance in the Government document Working Together to Safeguard Children (2010) which states:

'Expertise in both safeguarding and promoting the welfare of child and disability has to be brought together to ensure that disabled children receive the same levels of protection from harm as other children'.

Detailed guidance covering a wide range of disabilities and strategies for managing challenging behavior may be found at: <http://www.rfu.com/ManagingRugby>

Good Role Models

20. The GR paid and volunteer workforce should consistently display high standards of personal behaviour and appearance and refrain from pursuits considered unhealthy in front of their players. They must not make sexually explicit comments to children or vulnerable adults and any language which causes them to feel uncomfortable or lose confidence or self-esteem is unacceptable, as is the use of obscene or foul language.

Alcohol

21. It is important that GR management take considered, positive action to ensure that they are responsible licensees. It is against the law:
 - a. To sell alcohol to someone under 18;
 - b. For an adult to buy or attempt to buy alcohol on behalf of someone under 18;
 - c. For someone under 18 to buy alcohol, attempt to buy alcohol or to be sold alcohol;
 - d. For someone under 18 to drink alcohol in licensed premises, with one exception - 16 and 17 year olds accompanied by an adult can drink but not buy beer, wine and cider with a table meal;
 - e. For an adult to buy alcohol for a person under 18 for consumption on licensed premises, except as above.
22. At training sessions and games for children, adults' drinking habits may affect both children's attitude to alcohol and their emotional well-being. As role models adults should avoid excessive drinking in their presence.
23. The unexpected can always happen; there should always be adults who abstain from drinking alcohol to deal with any emergencies and to manage the safety and welfare of children and vulnerable adults in their care.

Contact Rugby

24. The wellbeing and safety of children and vulnerable adults must be placed above the development of performance. Contact skills must be taught in a safe, secure manner paying due regard to the physical development of the players involved.
25. Adults and children must never play contact versions of the sport together including training games or contact drills. They may play either tag or touch rugby together if these games are managed and organised appropriately (rfu.com/TakingPart/Play/Leisure). A risk assessment on the conditions, players and apparent risks should be carried out by a person responsible for the overall session.
26. Any inappropriate or aggressive contact or touching between adults and children or vulnerable adults is unacceptable and a number of principles should be followed when teaching contact rugby:
 - a. Physical handling by a coach must only be used for safety reasons or where there is no other way of coaching the technique (Level 1 Coaching Award in Rugby Union);
 - b. The reasons for physical contact should be explained wherever practicable so that children and their parents are comfortable with this approach;
 - c. The activity should always be conducted in an open environment and in the presence of another appropriately vetted adult.

Physical Intervention

27. Discipline on the field of play is the responsibility of the players. Coaches, team managers and parents must always promote good discipline amongst their players, both on and off the field. Penalising lack of discipline on the field of play which contravenes the laws of the game is the responsibility of the referee. Coaches, managers and spectators should not intervene or enter the field of play. Coaches of U7s and U8s may direct and develop play in a coaching sense on the field of play from behind their teams.
28. In a situation where individuals have to consider whether to intervene to prevent a child being injured, injuring themselves or others, physical intervention should always be avoided unless absolutely necessary. In these situations it is imperative to:
 - a. Consider your own safety;
 - b. Give verbal instructions first;
 - c. Use the minimum reasonable force and only when necessary to resolve the incident, the purpose being restraint and reducing risk;
 - d. Do not strike blows, act with unnecessary force or retaliate;
 - e. Avoid contact with intimate parts of the body, the head and neck;

- f. Stay in control of your actions.
- 29. The CSO should be notified at the earliest opportunity of an incident of physical intervention which involves possible dispute as a complaint might be lodged with GR or the Police by a parent whose child has been physically restrained. The incident should be recorded on a GR Incident Report Form for review by the MD and CSO. Further guidance on managing challenging behaviour can be found at: <http://www.rfu.com/ManagingRugby>.

Changing Rooms and Showers

- 30. Adults and children must never use the same facilities to shower or change at the same time. Adults must only enter changing rooms when absolutely necessary due to poor behaviour, injury or illness. Adults must only ever enter the changing rooms by themselves in an emergency and when waiting for another adult could result in harm to a child.
- 31. If children or vulnerable adults need supervising in changing rooms, or coaches or managers need to carry out a range of tasks in that environment this must involve two suitably vetted adults of the same gender as the children or vulnerable adults. For mixed gender activities separate facilities should be available.
- 32. If the same facilities must be used by adults and children or vulnerable adults on the same day a clear timetable should be established. No pressure should be placed on children or vulnerable adults who feel uncomfortable changing or showering with others, if this is the case they should be allowed to shower and change at home. Where a disability requires significant support from a parent; or carer, the person concerned and their parents should decide how they should be assisted to change or shower.
- 33. Before any assistance is offered by another person, appropriate consent should be given by a parent.

Transportation

- 34. GR has a transport policy publicised to parents giving advice on dropping off and collecting children.
- 35. It should be made clear that in most instances it is the responsibility of parents, not GR, to transport their child or vulnerable adult to and from Kingsholm or nominated meeting point. If parents make arrangements between themselves this is a private arrangement and at the parents' discretion.
- 36. If GR formally arranges transport e.g. using minibuses or people carriers (as opposed to facilitating travel arrangements between parents) then the responsible manager/staff member should ensure that:
 - a. Drivers have a valid driving license and recruitment procedures, including vetting criteria have been followed and appropriate insurance and breakdown cover has been arranged;
 - b. The vehicle is suitable for the number of passengers and has operational safety belts and appropriate child car seats;
 - c. Parents give their consent and have the driver's contact details, with the driver having easy access to parents' contact details including mobile phone numbers;
 - d. No child or vulnerable adult is left alone in the car with the driver, unless it is the adult's own child or vulnerable adult. If, in extenuating circumstances, this situation arises the child or vulnerable adult should sit in the back of the car if possible;
 - e. The children involved are happy with the arrangement and adults are alert to any signs of disquiet.
- 37. When hiring a coach from a reputable commercial coach company it is acceptable to assume that the company provides properly maintained and insured vehicles and properly licensed drivers. However, children must never travel unaccompanied. A member of GR must travel with the children and adult's contact details must be readily available to any parent who has reason to contact them.
- 38. In the event of a late collection of children/vulnerable adults, GR staff should attempt to contact the parents, wait with the child/vulnerable adult, preferably in the company of others, notify the CSO or an appropriate GR official and remind parents of their responsibility to collect their child promptly.

Photographic Images

39. GR welcomes the taking of appropriate images of children and uses the RFU guidance for parents and the paid and volunteer workforce to enable suitable photographs to be taken celebrating the Core Values of the sport.
40. There are risks associated with the use of photographic images. RFU Guidance on Photographic Images and professional photography can be found on the RFU Safeguarding website, which is based on common sense. The CSO must ensure that everyone is fully aware of, and complies with, this guidance.

Sharing of Electronic Material/Media

41. Staff must be made aware of the advice contained in the Cyber Guidance, available on Safeguarding pages on the RFU website. Websites can be a positive way to communicate with children. However, there are risks associated with use on the internet. GR is legally responsible for their website content and there should be nothing included which could harm a child, directly or indirectly. It is important to note that it is not acceptable to share sexually explicit or inappropriate material via any form of media with children or vulnerable adults. The online environment is ever changing. The guidance will be reviewed and updated when necessary. See <http://clubs.rfu.com/clubs/portals/rusafe/>

SECTION 5 - SAFE GUARDING RESPONSE ACTIONS

1. Safeguarding vulnerable people is everyone's responsibility. This means that all GR staff has a responsibility to respond to any concerns that they or others, may have about a child or vulnerable adult, or the behaviour of an adult.
2. Harm in the context of this policy is an action or behaviour which has a detrimental effect on a child or vulnerable adult's physical or emotional health or wellbeing. Harm is often referred to as neglect, abuse or bullying. In the case of vulnerable adults there is an additional category of abuse relating to financial matters, this includes: theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
3. Harm may start as poor practice, which might include: shouting, excessive training, ignoring health and safety guidelines, failing to adhere to the club's Safeguarding Policy, poor management of multiple squad age groups, including favouring or discriminating against particular teams and ridicule of players' errors. Neither poor practice nor suspicions of harm should be ignored. Whether physical, sexual, emotional, bullying or neglect, suspicions of harm should always be reported and victims supported throughout. Please refer to Table 2 below for steps to be followed regarding signs of harm.

Signs of Harm

4. It is important that in the rugby environment signs of harm are not ignored. These signs may include a child or vulnerable adult:
 - a. Changing their usual routine;
 - b. Beginning to be disruptive during sessions;
 - c. Becoming withdrawn, anxious or lacking in confidence;
 - d. Having possessions going missing;
 - e. Becoming aggressive or unreasonable;
 - f. Starting to stammer or stopping communicating;
 - g. Having unexplained cuts or bruises;
 - h. Starting to bully other children;
 - i. Being frequently dirty, hungry or inadequately dressed;
 - j. Displaying sexual behaviour or using sexual language inappropriate for their age;
 - k. Seeming afraid of parents or carers;
 - l. Stopping eating;
 - m. Being frightened to say what's wrong;
 - n. Not wanting to attend training or club activities, or even leaving the club
5. The above indicators should always be taken seriously and any concerns should be reported to the CSO at the earliest opportunity. Any report must be made in writing and briefed to the Managing Director.
6. There may be a number of reasons why a child displays concerning behavior or their behaviour changes. It is advisable to discuss concerns with parents or carers in the first instance except where this may place a child at increased risk. If a child or vulnerable adult discloses information you should:
 - a. Stay calm;
 - b. Reassure them that they are not to blame;
 - c. Avoid making promises of confidentiality or outcome;
 - d. Keep questions to a minimum;
 - e. Make brief, accurate notes at the earliest opportunity.
7. An individual who becomes aware of any suspicions or concerns about the safety or welfare of a child or vulnerable adult must pass these on to the CSO as soon as possible. If they feel the child is in immediate risk of abuse then a statutory agency (local children's services or the police) should be contacted immediately. If a vulnerable adult is at risk of abuse, their consent to the statutory agencies being contacted should be obtained, if possible before doing so.

Whistle Blowing

8. GR encourages and supports "whistle-blowing" and will, where appropriate, notify the statutory agencies of any allegation and work in partnership with them. GR investigation will usually commence once the statutory agencies have completed their investigations.
9. The wellbeing of the child or vulnerable adult must be central to any procedures involving them. The GR will work in partnership with local children's services or care services departments and to support the victim and witnesses.

Incident Referral Process

10. Once the RFU Safeguarding team receives written notification of an incident, allegation or disclosure they assume management of the case (providing it is not being dealt with by the police).
11. Once the RFU assumes management the club should take no further action until advised to do so by the RFU or relevant authority. The RFU will ensure that the club and Constituent Body are kept informed of procedure and progress.
12. Safeguarding investigations are handled by the RFU Safeguarding team and presented to the RFU's Referral Management Group (RMG) or its Sub-Group for consideration. The RMG is a cross-departmental group charged by the RFU with assessing the risk that individuals pose to children and vulnerable adults. The RMG is supported by an independent child protection adviser. Incidents may be referred by the RMG to the RFU Disciplinary department.

Those under Investigation

13. Under this Policy, GR is committed, first and foremost, to protecting the interests of the child or vulnerable adults. In the course of a referral being or statutory agencies, individuals who are accused of causing harm will be informed of the procedures. They may also request at any time an update on the progress of the referral. No further support will be offered during the course of the investigation. The Citizens Advice Bureau may be a useful source of information and support in these instances.
14. Investigations are concluded as quickly as possible to ensure that those guilty of causing harm are dealt with expeditiously and those falsely or mistakenly accused are able to return to the game with reputation intact.

Suspension

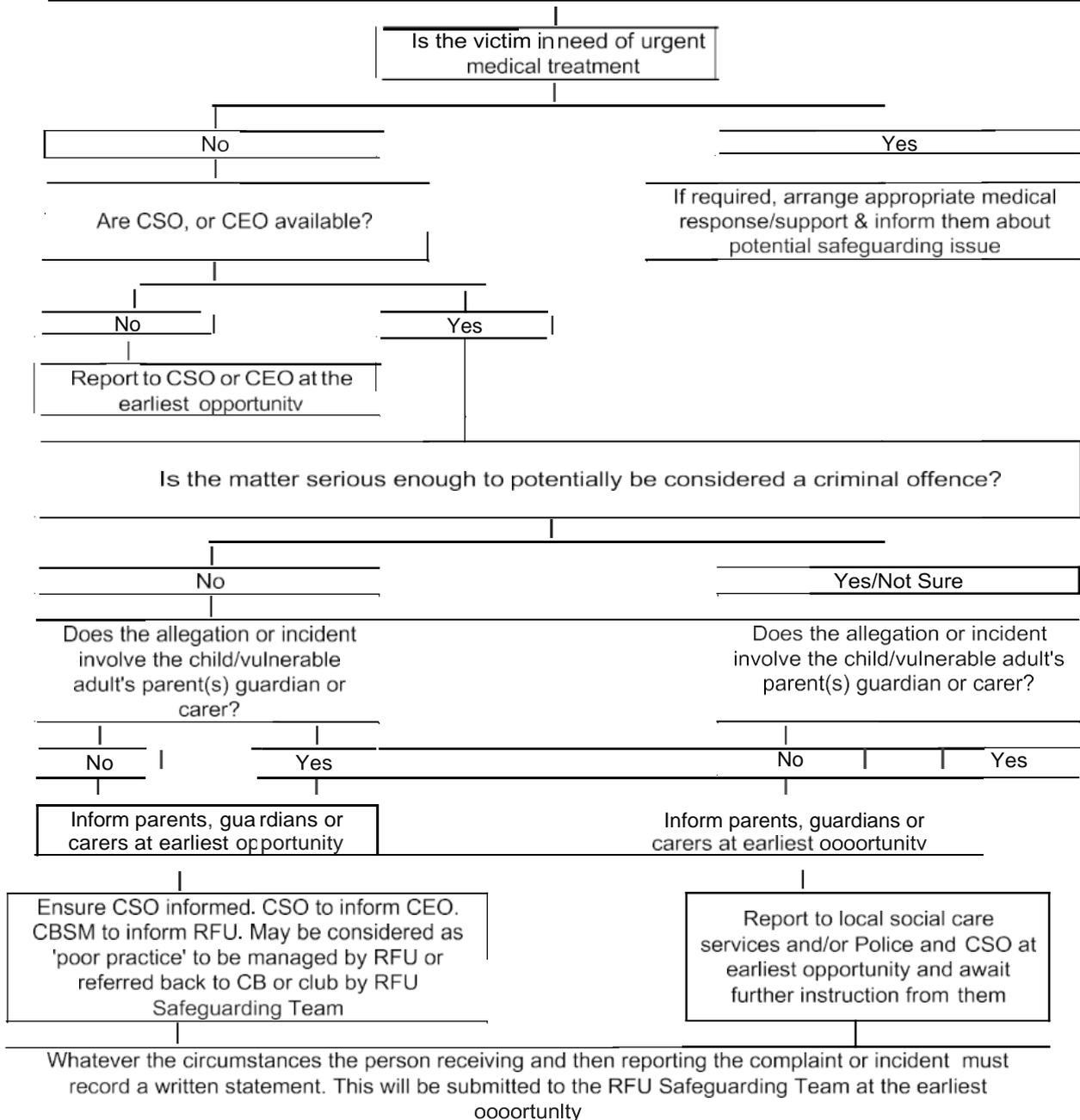
15. Until the investigation has been completed the staff member or volunteer involved will be suspended from working at any activity linked to rugby or wider GR activities. The person or persons will also be banned for premises owned or used by GR

Table 2 - Signs of Harm

A child or vulnerable adult has disclosed concerning information to you or you have witnessed or had reported to you an incident or complaint involving the behaviour of an adult in relation to a child or vulnerable adult, which may be considered abuse or poor practice

It is essential when considering an incident or concerns involving a vulnerable adult to, where possible, obtain the consent of the vulnerable adult before referring the matter to a statutory agency

STAY CALM - REASSURE - NO PROMISES - FEW QUESTIONS - FOLLOW GUIDE



SECTION 6 - USEFUL CONTACT NUMBERS

1. The following numbers could be useful for the CSO and senior managers as appropriate:

RFU Child Protection Helpline 24hr Answerphone
0208 831 6655(non-emergency)

DBS disclosure service

DBS customer services
PO Box 110
Liverpool
L69 3JD

[Emailcustomerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

Disclosure helpline 0870 90 90 811

Safeguarding Training Courses
0208 831 7987
rusafe@therfu.com

NSPCC Helpline
0808 800 5000
www.nspcc.org.uk
(for adults - 24hrs)

Child Protection in Sport Unit
0116 234 7278
www.thecpsu.org.uk

Childline
0800 1111
(for children - 24hrs)

Useful References

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/349126/DBS guide to eligibility v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/349126/DBS_guide_to_eligibility_v6.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/326537/ID Checking Guidance v1 2 July 2014.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/326537/ID_Checking_Guidance_v1_2_July_2014.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/230923/DBS Applicant Guidance v1.4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/230923/DBS_Applicant_Guidance_v1.4.pdf)

