

Safeguarding Children: Recognising & Responding to Abuse & Poor Practice



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Approval

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CONTENTS

| Introduction4 |
|---|
| Abuse of a Position of Trust5 |
| Poor Practice |
| Responding to Child Protection & Safeguarding Concerns7 |
| Responding to a Disclosure from a Child |
| Reporting the Concern |
| Reporting Gymnastics Related Allegations10 |
| Responding to Abuse or Serious Poor Practice during a Training Session or Event |
| Confidentiality and Information Sharing11 |
| Sharing Concerns with Parents12 |
| Recording Information12 |
| Allegations of Historical Abuse |
| Responding to Poor Practice Concerns |
| Quick Guide to Responding to Concerns |
| What Happens Next?15 |
| Whistle Blowing |
| Responding to Media Enquiries |

Responding to Abuse & Poor Practice Concerns

Introduction

Abuse can, and does, occur in a wide range of settings, including sport. The psychological effects of abuse can be life-long, especially if the individual has not been able to disclose the abuse or access support. Anyone who has been abused as a child or young person may find it difficult or impossible to maintain stable, trusting relationships, may become involved with drugs and experience mental health problems or self-harm. A child who has been neglected can experience serious impairment in their health and development.

For the purpose of this document and all Safeguarding policies, British Gymnastics (BG) refers to children as any person under the age of 16 years and a Young Person as being over 16 but under 18 years, irrespective of their role.

A child may be abused or neglected through:

- Inflicting harm.
- Failing to act to prevent harm.

A child may be abused by:

- A family member.
- A person within an institutional or community setting.
- A person known to them or more rarely by a stranger.
- An adult, or adults, or another child, or children.

Everyone in sport has a responsibility to be able to recognise and respond to signs and indicators of abuse and poor practice. It is not the responsibility of any individual within gymnastics to determine whether a child has been abused but is everyone's responsibility to act on those concerns.

Child abuse can take many forms, but can be broadly separated into five main categories:

- Physical abuse
- Emotional abuse
- Sexual abuse
- <u>Neglect</u>
- **<u>Bullying</u>** (although not a category of abuse, it can have damaging consequences for children, as can all other forms of abuse).

Children may also be harmed as a result of:

- Poor or unsafe coaching practice.
- Discrimination, harassment or victimisation (see Equality Policy).

Some forms of abuse including grooming, sexual, emotional abuse and bullying, often take place online through social media (see Good Practice Guidelines on the use of Social Networking sites).

Abuse of a Position of Trust

A relationship of trust exists where an adult, by virtue of their role, is in a position of power or influence over a young person. Although an adult engaging in any sexual activity with a young person under the age of sixteen would be committing a criminal offence, in some circumstances, engaging in sexual activity within a relationship of trust is also a criminal offence.

The <u>Sexual Offences (Amendment) Act 2000</u> introduced the offence of abuse of a position of trust whereby a person in a position of trust would be committing a criminal offence if they were to engage in sexual activity with a person under the age of 18 with whom they have a relationship of trust. This is irrespective of the whether the young person has ostensibly consented to the relationship. The Act sets out a series of occupations to which the legislation applied, which was extended in the <u>Sexual Offences Act (2003)</u> but does not cover coaches and others involved in sports clubs who hold positions of trust.

Irrespective of the current legal position BG believes anyone who engages in sexual activity within a relationship of trust is in serious breach of the BG Policy and is likely to be considered unsuitable to work with children in gymnastics.

It is acknowledged that in some situations a shared attraction may develop between two people within a relationship of trust. In such circumstances, it is essential that the individual who holds the position of trust behaves in an open manner, makes the Club Welfare Officer aware of the situation, and resigns from this position of trust if the parties involved wish the relationship to develop beyond the existing professional one. This will ensure that the previous power differential is not a factor in any future relationship. It is strongly advised that the young person is given an opportunity for reflection before any sexual relationship develops. It is the responsibility of the adult to ensure that his or her conduct is fully in line with the law and BG Policy.

Poor Practice

It is essential that everyone challenges poor practice, even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed.

Poor Practice can be split into a number of groupings. These include: -

• Practices that may be on the fringe of abuse and/or if repeated again and again, would amount to abuse. Most of the examples are linked to emotional abuse.

Examples include:

- Name-calling including sarcasm and racism.
- Excessive monitoring of weight.
- Constant criticism of a child.
- Exerting excessive pressure.
- Forcing a child to do something against their will.
- Use of inappropriate language.
- Harassment.
- Being ostracised or ignored.
- Breaches of BG Safeguarding policy and procedures by BG clubs and members.

Examples include:

- No Welfare Officer within a club.
- Inadequate safeguarding arrangements.
- Providing inadequate supervision and/or care.
- Failure to respond appropriately to concerns.
- Expelling anyone from the club who raises a concern.
- Excluding parents from observing or asking questions about training.
- Inappropriate use of photographic equipment or materials, including live streaming with external access viewing.
- Breaches of recognised best practice in coaching.
 - Providing coaching, or running a session, without another responsible adult present.
 - Exceeding level of competence and/or qualification.
 - Employing practices that are inappropriate for the stage of psychological and physical development of the individual.
 - Excessive training or competition.
 - Inappropriate/excessive supporting or stretching.
- Practices that may be carried out with the best intentions but that fall into a category of behaviours' that are used by people who sexually abuse children to 'groom' their victim.

Examples include:

- Offering to give a child a lift home alone.
- Giving a child gifts.
- Having unnecessary physical contact with young people, e.g. excessive handling/supporting, cuddling, kissing or 'friendly' taps.
- Socialising/having friendships with children or young people outside training.
- Being friends and connected with anyone under 18 years via social media.
- Practices that are known to be significant risk factors in cases of abuse.

Examples include:

- Taking children home or other secluded place unaccompanied by others.
- Engaging in rough, physical or sexually provocative games.
- Sharing a room with a child.
- Allowing or engaging in any form of inappropriate touching.
- Making sexually suggestive remarks.
- Reducing a child to tears as a form of control.
- Allowing children to use inappropriate language unchallenged.
- Allowing allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Carrying out personal care for a child that the child can do unaided.
- Departing from the premises without first supervising the safe dispersal of children.
- Abusing a privileged position of power or trust.
- Resorting to bullying tactics, or verbal abuse.
- Causing a participant to lose self-esteem by embarrassing, humiliating or undermining the individual.
- Spending excessive amounts of time alone with children away from other adults.

BG accepts that on occasion there may be unplanned situations where the unexpected does occur, which leads to a responsible person being alone with a child. In addition, situations arise where a child/young person may:

- Become distressed.
- Be accidentally hurt by someone else.
- Misunderstand/misinterpret something that has been said or done.
- Appear to become sexually aroused.

In these situations, the individual involved **must** report the incident immediately to the Welfare Officer or a senior colleague and compile a brief written report of the event and maintain records of all communications. The parent should also be informed.

Key Points

There is a responsibility to respond to both concerns within and external to the sport.

All concerns and allegations of potential poor practice or abuse will be taken seriously and responded to swiftly and appropriately.

Statutory Authorities have the responsibility for investigating abuse but it is everyone's duty to report any concerns.

Responding to Child Protection & Safeguarding Concerns

In addition to ensuring all BG members are fully aware of the importance of Safeguarding, it is essential that anyone who comes into contact with children/young people as part of their role in the sport understands what action should be taken in response to concerns, disclosures and allegations against others involved in the sport.

It is not the role of BG, or anyone in the sport, to conduct enquiries into possible child abuse concerns. The following procedures outline the responses that should be taken in the event of an allegation or suspicions of abuse or significant harm. (This section also provides guidance sharing relevant information with Children's Social Care Services and/or Police and other relevant organisations without delay and within agreed protocols).

Child Protection & Safeguarding concerns fall into two categories:

- Gymnastics related.
- External to the sport, e.g. at home.

The concern may relate to a current situation or past events and may be about allegations or disclosures of abuse or poor practice by an individual or relating to a perceived failure to safeguard by a BG registered organisation.

Concerns may arise from:

- A disclosure from a child, young person or adult.
- Direct or reported observations of possible abuse, neglect, suspicious behaviour or poor practice.
- Significant or multiple changes in the child or young person's behaviour, appearance, attitude or relationship.
- Reports from external agencies or individuals.

It is important to note that some children or young people are unable to recognise or share concerns and often rely on adults with whom they are in contact to be alert to the possibility that they may be experiencing harm in some area of their lives.

British Gymnastics primary responsibility is to ensure that concerns relating to possible abuse, together with any relevant information, are passed on to Children's Social Care Services and/or the Police without delay. These organisations have the statutory responsibility to make enquiries to establish if a child is at risk of significant harm and, where appropriate, to investigate any possible criminal offences. It is vital that individuals within a club are aware of what action is required, who to contact and ensure any concerns are referred to the appropriate Point of Contact as shown below: -

- BG Lead Officer The BG Lead Officer must be informed of **all** abuse concerns.
- Home Country Lead Officer The HCLO should be informed of any concern that occurred within the relevant home country.
- Regional Welfare Officer (RWO) The RWO should be informed of any concern that occurred at Regional level. The RWO should also be a source of advice and support for their network of Club Welfare Officers (CWO).
- Club Welfare Officer (CWO) The CWO should usually be the first point of contact for any concerns that relate to a member of his or her club.
- Squad/Event Welfare Officer There should always be a Welfare Officer assigned to a squad or event. Although they may not always be present, their details should be actively advertised, they should be 'on-call' at the time of the squad/event and be contacted in the event of any concern relating to the specific squad or event.

The roles and responsibilities of the above positions are set out in the **<u>Safeguarding Glossary of Terms</u>**

Responding to a Disclosure from a Child

If a child indicates that he/she is being abused, or information is received which gives rise to concern that the child may be being abused, the person receiving the information should:

- stay calm and ensure that the child is safe and feels safe.
- listen carefully to what is said and actively listen.
- explain that it is likely the information will have to be shared with others do not promise to keep secrets.
- allow the child to continue at his/her own pace.
- keep questions to a minimum to ensure a clear and accurate understanding of what has been said.
- reassure the child that they have done the right thing in disclosing the information.
- show and tell the child that what he/she says is being taken seriously and recognise any difficulties inherent in interpreting what the child says.
- tell the child what will be done next and with whom the information will be shared.
- record in writing what was said using the child's own words as soon as possible. The following
 information should be recorded:
 - Place, date time of disclosure.

Version 2.0 2017

- Place, dates and times of incidents.
- any names mentioned.
- to whom the information was given.
- information that is fact, (hearsay or opinion should be noted as such, but nevertheless passed to the relevant statutory agency).
- ensure the record is signed and dated and provided to the relevant statutory agency and BG.

If the child indicates that he/she does not wish others to be informed about the allegation, carefully and tactfully explain the reasons why it may be in the interests of everybody if the matter is referred to the appropriate person or department, (i.e. Children's Social Care).

The person to whom the disclosure is made is presented with a great responsibility and it is advisable, if there is any uncertainty, to seek advice on how to deal with the issue, from Children's Social Care, NSPCC or from the BG Lead Officer.

Actions to Avoid:

- Dismissing the concern.
- Ridiculing or being judgemental of the information being disclosed.
- Panicking.
- Allowing shock or distaste to show.
- Probing for more information than is offered (this could be construed as leading a child).
- Making promises that cannot be kept, such as agreeing not to tell someone else.
- Speculating or make assumptions.
- Approaching the person who is the subject of an allegation or suspicion, (this may put a child or young person at further risk and/or jeopardise a criminal investigation).
- Conducting a personal investigation of the case.
- Making negative comments about the accused person.

Irrespective of whether the person receiving the information personally believes what has been said, they must always report the disclosure. Untrue disclosures, even when the source is anonymous, are very rare.

Reporting the Concern

In the event that a child or children may be at risk of significant harm, or an allegation or disclosure is made that could amount to abuse, the concern must be reported to BG/Home Country Lead and Children's Social Care or the Police without delay.

The Welfare Officer is responsible for making this referral but in the event that he or she is unavailable and it is not possible to contact the BG/Home Country Lead Officer, a senior person at the club should be advised

and the matter referred directly to the Children's Social Care and/or the Police. The Welfare Officer and BG/Home Country Lead Officer should be informed at the earliest opportunity.

If the concern relates to the Welfare Officer, a senior person at the club should be informed and the matter should be referred to Children's Social Care and/or the Police and BG/Home Country should be notified without delay.

Whoever makes the referral must ensure that the contact details of the person to whom the referral was made are provided to BG/Home Country, together with the details of the referral without delay.

In the event that there is any uncertainty as to whether a referral is appropriate, the BG/Home Country Lead Officer, NSPCC 24-hour helpline, Children's Social Care will be able to offer advice on what action should be taken. In the case of an emergency dial 999 or if not an emergency dial 101 to obtain further advice from the local Police.

Reporting Gymnastics Related Allegations

Allegations involving BG members or employees are sensitive and difficult issues to manage. It is crucial that everyone involved in gymnastics takes seriously any allegations made against a coach, helper, official or anyone else working with children or young people and responds appropriately. The Welfare Officer must be notified immediately of any circumstances that cause concern or raise suspicions. If the Welfare Officer is unclear about what action to take, advice should be sought from BG/Home Country Lead Officer, the NSPCC or the Designated Officer appointed by the Local Authority Local Authority Designated Officer (LADO).

BG will inform the Designated Officer within one working day of all abuse allegations relating to BG members that come to BG's attention. The <u>BG Safeguarding & Compliance team</u> will, following consultation with the Designated Officer and statutory authorities, consider whether it is necessary to place the individual under suspension pending further Children's Social Care Services or Police enquiries. The Chief Executive Officer will have the overall authority to authorise suspensions. British Gymnastics **MUST** be kept fully informed of any concerns, as it is essential that an early decision is made about whether to suspend any member to avoid placing other children or young people at risk.

When a referral is made to Children's Social Care, they have a legal responsibility to make enquiries where a child may be at risk of <u>significant harm</u>. This may involve gathering information from others who know the child, or talking to the young person and their family. Enquiries may be carried out jointly with the Police where a criminal offence is suspected. If a child is at immediate risk and action needs to be taken urgently, contact the Police by dialling 999. If concerns are identified out of hours, the Police and Children's Social Care Services provide an out-of-hours service.

Responding to Abuse or Poor Practice during a Training Session or Event

It is not unknown for an act of abuse, but more likely poor practice, to occur within a training or competition environment. The following information provides instruction on what action should be taken at the point that the act of abuse or poor practice is observed. It may be helpful to note that, based on the experience of case referrals, the most likely types of abuse to be encountered in the gym environment are physical and emotional abuse. An act of possible abuse or poor practice needs to be reported without delay in line with the BG reporting procedures described above.

The subject of the concern should be approached immediately by the senior official and another official, ideally the Welfare Officer (if they are on site), and informed of the concerns. If the abuse or poor practice is on-going, he/she must be instructed to stop immediately and an emergency call made to the Police to provide assistance if required. The priority is to ensure that the child/children are made safe. The Welfare Officer or another responsible adult must remain with the children until their needs have been fully addressed.

If the child concerned requires immediate medical treatment this should be sought without delay by dialling 999 and informing the Police/Children Social Care Service that this action is being taken. It is important that the medical team is made aware that the issue is potentially one of a child protection nature.

If the matter of concern is felt to be serious poor practice rather than abuse and children are not at significant risk, a subtler approach would be appropriate and the Welfare Officer may not need to be involved. Consideration should be given to informing the individual in a manner that will not undermine his/her position with the young people.

Confidentiality and Information Sharing

Sharing information is vital to ensure that young people's needs are met and is critical in ensuring children are protected from significant harm. However, there is often uncertainty about the circumstances in which information can be lawfully shared. <u>Consent</u> should normally be sought from the subject/s of the information in order for it to be shared, but it may be necessary for information to be shared with the Welfare Officer, Children's Social Care Services, the Police and BG without consent if there is reason to believe that seeking consent could:

- Place the child or others at increased risk of significant harm, or
- Place an adult at risk of serious harm, or
- 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 serious harm to an adult), including where seeking consent might lead to interference with any potential investigation.

Following initial enquiries, it may be deemed necessary to share some information with others, particularly those who have contact with the subject of the allegation/s.

Information must only be passed to those who require access to these details in the course of their safeguarding duties. A record must be maintained of all those to whom information is disclosed, and the details of the information provided. Case information must only be shared on a <u>'need to know'</u> basis.

All BG registered organisations' and individual members must ensure that in dealing with information relating to safeguarding concerns there are no unacceptable breaches of confidentiality. In addition, there is a responsibility to ensure that parents, gymnasts and their families understand the need to avoid unnecessary discussion of safeguarding concerns. Not only can such a breach be highly damaging to the young person and others involved but may also prejudice a Police investigation.

Case information should:

- Where the call is incoming only be given out over the telephone where there is absolute certainty of the identity of the person making the call, or the identity of the caller is confirmed by returning the call through a switchboard number.
- Where the call is outgoing only be given out over the telephone and connected through a switchboard and where there is absolute certainty of the identity of the person receiving the call.
- Be confirmed in writing if any significant advice/case details are given over the phone.
- Be securely stored in a locked cabinet in a lockable room and not unnecessarily taken out of the building.
- Be marked 'private and confidential' and sent by recorded delivery if sent by post.

Sharing Concerns with Parents

There is always a commitment to work in partnership with parents where there are concerns about their children. Therefore, in most circumstances it would be important to talk to parents to clarify any initial concerns. For example, if a child or young person seemed withdrawn, there may be a reasonable explanation. The child may have experienced an upset in the family, such as a parental separation/divorce or bereavement.

In cases where a child or children may be at risk of significant harm, the Welfare Officer (whether the concern was identified by them directly or another person), should at the same time consider whether it is appropriate to contact the parent(s) or not. If the child or children could be at risk of significant harm from their parent(s) and by informing them may increase the risk posed, then they should **not** be notified of the referral to statutory agencies. The relevant statutory agency will manage such communication. The referral form should be annotated as such and provide the reason for not informing the parent(s). However, where only a single parent is involved and is not implicated in the concern, then they are to be contacted and informed. If there is any uncertainty as to who should be informed and what information should or should not be provided, then advice should be sought before doing so, from Children's Social Care Services, the Police or BG Safeguarding & Compliance team.

Recording Information

Any information passed to the Children's Social Care Services or the Police must be as accurate and helpful as possible and, ideally, should be accompanied by a detailed record providing:

- Personal details of the child concerned including age or date of birth, full name, gender, race, ethnic origin and address.
- Details of parent/carer and an indication of what, if any, information has been shared.
- The nature of the allegation.
- Full details of the person about whom the concern/allegation is made including full name, date of birth, address, relationship to the child concerned and/or position held in the club, if any.
- Description of any visible injuries or bruising.
- Detailed description of the child's account of how the injuries or bruising occurred.
- Details of the place, date and times of the incident or other relevant information.
- A clear distinction between what is fact, hearsay or opinion.

Reporting the matter to Police or Children's Social Care Services should not be delayed by attempts to obtain more information. Wherever possible, referrals made by telephone should be followed up with a copy of the incident report form within 48 hours. The Welfare Officer should record on the incident form the name and designation of the Children's Social Care Services member of staff or Police Officer, including their rank and department to whom the concerns were passed, together with the time, date and reference of the call.

A copy of any case information should also be sent to British Gymnastics Safeguarding & Compliance team or the appropriate Home Country governing body Safeguarding Lead Officer.

Allegations of Historical Abuse

It is possible that allegations of abuse may be made some considerable time after the event. Where a historical allegation is made by an adult, the Welfare Officer should:

- Clarify whether there are any children who may currently be at risk.
- Advise the adult to make a formal complaint to the Police, explaining that there is a significant likelihood that a person who has previously abused a child will have continued and may still be doing so.
- Offer the adult support in making a formal complaint to the Police.
- Provide information about relevant support services.

Any concerns around consent, anonymity and confidentiality should be raised with BG/Home Country lead for further advice.

Where the individual chooses not to report the matter to BG or the Police, the Welfare Officer should highlight the possible risk to children. Where it is believed that children may be at risk, a referral should be made to Children's Social Care and reported to BG Safeguarding & Compliance team and the adult who made the disclosure should be informed of this action. If the individual wishes to remain anonymous this must be respected; however, they should also be asked if they would be willing to talk with a representative of Children's Social Care to enable them to take steps to safeguard themselves or any other person/child who may be at risk.

Any historical abuse allegation from a child must be treated as if it is current and reported in line with BG procedures.

Responding to Poor Practice Concerns

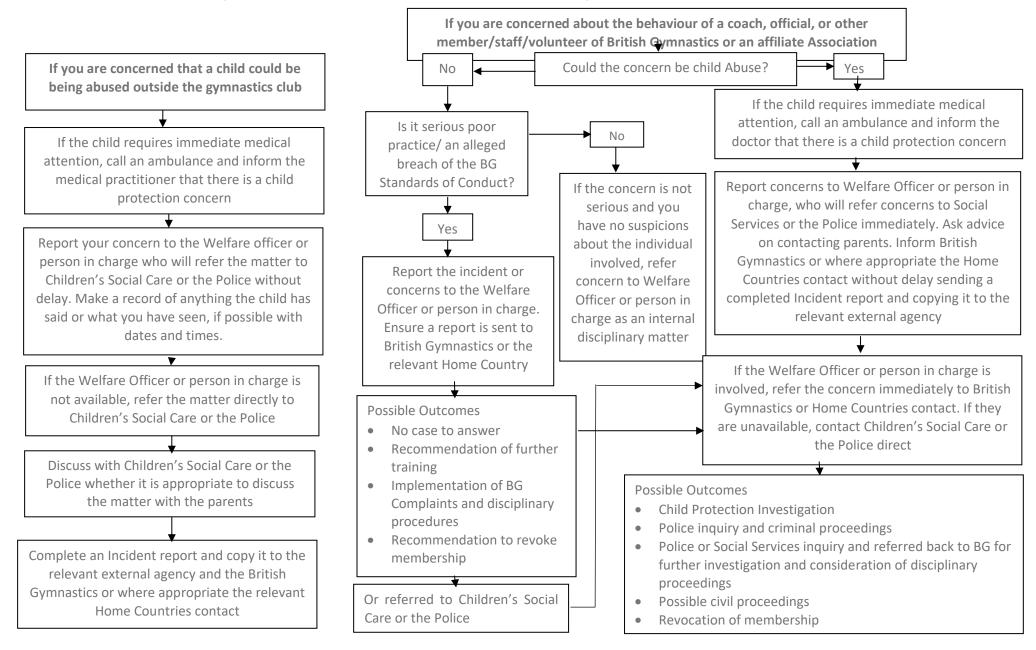
If, a Welfare Officer receives a disclosure, an allegation or an observation of behaviour or practice that gives cause for concern and following consultation with BG Safeguarding & Compliance team, it is agreed that the threshold for referral for BG intervention has not been reached, the club or organisation should take appropriate action. In the event that the concern is considered to be an isolated incident of poor practice then, together with the Welfare Officer, a senior person at the club should discuss the matter with the subject of the concern and agree appropriate remedial action in line with BG policy and guidance. If the case is considered to be serious poor practice, or the poor practice relates to the Welfare Officer, the matter will be referred to BG to determine the appropriate course of action. This includes:

- Poor practice allegations that have been previously addressed by the club but continue to remain a concern.
- Any incidents of poor practice that raise suspicions or concerns about abuse.

In some cases, it has only become apparent that a poor practice concern has been an indicator of abuse after BG/Home Country has collated information from a variety of sources. It may not be possible to form a view of the significance of an isolated piece of information, but it is essential that in the above circumstances information is **always** reported to BG, together with copies of all relevant records.

Quick Guide to Responding to Concerns

This quick guide is designed to provide guidance for BG staff and members on the most appropriate action to be taken if abuse is suspected or repeated or suspicious poor practice or breach of BG Standards of Conduct is witnessed. Further guidance can be obtained at any stage by contacting BG Lead Officer, or NSPCC Helpline on 0800 800 5000 or 0808 800 5000. All reports should be made on the BG Child Protection Incident Report form, downloadable from the BG website.



What Happens Next?

Where a complaint/concern of abuse or poor practice is made there may be three types of investigation: -

- Criminal conducted by the Police.
- Child Protection carried out under section 47 (1) of the Children Act 1989.
- BG enquiry determined by the <u>BG Case Management Team (CMT)</u> as to whether following investigation appropriate action and measures are taken or whether formal disciplinary action is required.

The person that made the allegation, or their family, may also initiate civil proceedings.

Where a statutory authority investigation is on-going, BG will maintain liaison, but will only act following full consultation with the relevant agencies, or at the request of the statutory agency.

The BG CMT would consider the outcome and evidence of any criminal and/or child protection investigation when determining what action should be taken, whether it be appropriate action, measures and advice or formal disciplinary action in accordance with BG Complaints & Disciplinary procedures Complaints & Disciplinary procedures.

Irrespective of the findings of the Children's Social Care Services or Police investigations, BG will assess all individual cases to decide whether a recommendation should be made to reinstate a member, or to move towards disciplinary proceedings. British Gymnastics will hold a disciplinary hearing for anyone investigated or charged by the authorities with abuse (except where an individual has been convicted). This may be a difficult decision; particularly when there is insufficient evidence to uphold any action by the Police.

British Gymnastics disciplinary panels will comply with the principles of natural justice. The applicable standard of proof shall be the civil standard, of the balance of probability; whether it was more likely for the allegation/s to have occurred. All efforts will be made to obtain as much evidence that is available to advise the panel and there is a right to appeal against the decision. Throughout these processes the welfare of children will remain paramount and British Gymnastics will endeavour to provide appropriate support to children, parents, coaches and volunteers who are affected by an abuse situation including, where appropriate, the alleged perpetrator.

In line with current legislation, BG will make a referral to the **Disclosure and Barring Service (DBS)** or the Home Country equivalent in any instance where a decision is reached to exclude a BG member from regulated activity within gymnastics because they harmed or pose a risk of harm to a child, or received a caution or conviction for a relevant offence.

Any club who removes an individual (employee or unpaid volunteer) from work with children (or would have, had the person not left first) because the person poses a risk of harm to children must also make a referral to the **DBS** Or the Home Country equivalent. It is an offence to fail to make a referral without good reason. *BG* will ensure clubs who report all incidents and allegations to BG are compliant with such legal responsibilities.

Further details on how to determine if a role being undertaken is considered to be a regulated activity can be found in the **<u>BG Criminal Record Checks Policy and Guidelines</u>**.

Whistle Blowing

Safeguarding children and young people requires everyone to be committed to the highest possible standards of openness, integrity and accountability. BG supports an environment where people feel free to raise their concerns with the knowledge that all concerns will be taken seriously.

The term 'whistle blowing' is often used in such circumstances to describe the raising of a concern about practices, procedures or conduct of an individual. In a gymnastics context, a whistle-blower may be:

- A coach or official.
- A gymnast.
- A parent.
- A member of the public.

There is a wide range of concerns that would come under the scope of this policy. They include, but are not limited to, the following: -

- Physical, emotional or sexual abuse, bullying or neglect of young people.
- Grooming of young people.
- Failure to comply with obligations set out in the BG policy and procedures.
- Repeated poor practice despite intervention.
- A criminal offence involving a child.

Concerns of poor practice should initially be made to the relevant Club Welfare Officer, except where:

- The whistle-blower believes there would be a risk of victimisation, either to the whistle-blower or child/children, if the matter was raised internally within the club **or**
- The whistle-blower has already raised the matter internally and the matter was covered up or no action was taken and the situation remains unchanged.

Concerns should be raised without delay to the BG Lead Officer. The earlier concerns are reported, the easier it will be to take action.

Anyone reporting a concern should provide as much information and detail as possible. This should include:

- Names of the people involved.
- Other witnesses.
- Dates, times and locations of events.
- What action and/or advice was taken.
- Any other relevant documentation.

There may be some situations where there is a reluctance to raise concern. This may include situations where the subject of the concern is a close friend or colleague of the whistle-blower, or situations where other people are appearing to ignore the situation.

One of the reasons that individuals do not report concerns is a fear of negative repercussions to the individual or their associates. In the case of parents, there is often a reluctance to raise concerns due to a worry that their child will be excluded from club or squad and isolated from friends.

BG understands that whistle-blowers are often very reluctant to report concerns. Thus, BG recognises that whistle-blowers may wish to raise concerns in confidence. In these circumstances, the identity of the whistle-blower will be kept confidential. Any subsequent reason why disclosure may be required will be discussed in detail with the whistle-blower before any action is taken.

It must be recognised that concerns that are reported anonymously are frequently very difficult to investigate. The decision whether to investigate an anonymous allegation will be made by BG, based on the seriousness of the concern(s) and the credibility of the referral and the likelihood of identifying others who can confirm the allegations. Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

All concerns raised under this procedure will be treated seriously and a decision made about whether or not an investigation is appropriate. Depending upon the nature of the matter it may be referred to the Police. The whistle-blower, where possible, should be kept informed about the progress of the investigation and advised of the outcome. In some cases, the investigation may result in criminal or disciplinary proceedings. In these circumstances, the whistle-blower may be asked to provide a written statement and give evidence to the Police and/or at a BG hearing. BG will provide support to the whistle-blower during this process.

BG will not tolerate harassment or victimisation and will take action to protect anyone who has raised a concern in good faith. Any BG member who is found to have victimised or harassed a whistle-blower will face disciplinary action. Any BG member who raises concerns known to be untrue may also be subject to disciplinary action.

Responding to Media Enquiries

Child abuse is an area of great interest to the media. When incidents occur, it is important to have a strategy to manage any media enquiries. Although British Gymnastics and the Home Countries can deal with media enquiries, it is important for clubs and regions to be able to handle initial enquiries in a sensitive and appropriate manner to avoid generating any negative publicity.

The media can become involved in cases as a result of approaches made by a source linked to the victim and may already have significant information before approaching the club or region. If any staff or BG member is approached by a journalist, the following guidance should be followed:

- Take a note of the journalist's name and whom they represent, (i.e. Newspaper, TV Company etcetera), and any contact details.
- Take a note of what the journalist is asking you and ask for any clarifications.
- Establish whether the journalist has any deadlines and inform them that the matter will be referred to BG or the appropriate Home Country who will contact them with a response.
- Inform the appropriate Welfare Officer, or person in charge, who will refer the matter to BG or the appropriate Home Country Lead Officer. An appropriate response will be formulated in consultation with BG Press and Media Officer or appropriate Home Country Officer.
- A copy of the response will be forwarded to the journalist, the club and appropriate region.

The same procedures should be followed for any subsequent enquiries and always ensure that BG or the Home Country is kept fully informed of any local press coverage.

It is important to recognise the harm that can be done to a sport by negative media coverage. Staff and BG members should not be tempted to speak 'off the record' to journalists as this may result in damaging publicity but they should also not pretend the situation is less serious, as this can often create equally detrimental press coverage.