

Active Partners Trust Safeguarding Policy - Children and Young People

This document has been provided to help our team, partners, stakeholders and anyone needing information about safeguarding children and young people in sport and physical activity in Derbyshire and Nottinghamshire. It includes useful information and key contacts for Derbyshire and Nottinghamshire. This policy applies to all activities promoted under the brands of Active Derbyshire and Active Notts. Active Partners Trust has a separate policy for safeguarding adults at risk.

Active Partners Trust's nominated Lead Officer for safeguarding children and young people is:

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The Board Member identified to promote safeguarding is Derek Highton.

If you have any concerns about the welfare or safety of a child or young person you must follow the steps set out in sections 8-11 of this policy document

The Safeguarding Concern Report Form Appendix 1 and the Incident Reporting flow chart Appendix 2 are at the end of this document.

This policy replaces the policies of Derbyshire Sport and Sport Nottinghamshire.

It was approved by the Active Partners Trust on 21 September 2023 and will be reviewed annually.

Version 3

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1. Policy Overview

1.1 Statement of Intent

- Active Partners Trust is committed to making sport and physical activity an enjoyable, positive inclusive and safe experience for everyone and promotes the safety and welfare of all children and young people taking part in activities in Derbyshire and Nottinghamshire.
- APT recognises the inequalities exist in society and that some children and young people are more likely to be inactive due to these. APT is committed to working with other to help address these, focusing resources in our more deprived neighbourhoods and recognising that some children and young people may need more and different support to others.
- APT will ensure that responsibility and accountability for safeguarding is placed firmly at a senior level within the organisation (Board Safeguarding champion and the Head of Operations) and delivery is the responsibility of all employees, volunteers and partners.
- APT will work closely with the NSPCC Child Protection in Sport Unit (CPSU) to make sure that the necessary standards are in place to help create a safe and inclusive environment for children and young people and to protect them from harm. To do this, we will produce and review an annual implementation plan and formally review this Safeguarding policy at Board level at least every three years.
- APT will support and promote a culture of listening to children's and young peoples' views.
- APT will model best practice in any direct delivery undertaken by its core team, delivery staff and volunteers and promote best practice to partners, supporting them to achieve minimum operating standards in terms of safeguarding.
- APT will make sure that any grants or service level agreements to third party delivery organisations include effective arrangements to safeguard children and young people, including adequate policies and procedures.
- APT will provide and promote safeguarding training internally for employees and volunteers and if required, externally for coaches, community organisations, clubs, delivery providers etc. Available safeguarding training courses are promoted on Making our Move website.
- Working with coaches, community organisations, clubs, delivery providers and volunteers, APT will raise awareness and support those working in sport and physical activity, to support them gain knowledge and to provide guidance to protect children and young people and minimise avoidable risks.

The Board of APT fully endorses these aims in this important area of work.

1.2 Definitions

- **Children and young people** refers to anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.
- **Parents** is used as a generic term to represent parents, guardians and carers.

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1.3 National standards for safeguarding and protecting children and young people in sport

This policy is designed to meet the ten standards set out by the NSPCC Child Protection in Sport Unit (CPSU). Information about the national standards is available on the NSPCC CPSU website. https://thecpsu.org.uk/media/445556/web_cpsustandards.pdf

The responsibilities of APT, as a sports organisation, as outlined in the government guidance 'Working Together to Safeguard Children - July 2018' are acknowledged and addressed in this policy and required procedures. It will be the responsibility of the APT's safeguarding Lead Officer or Deputy Lead Officer to attend, if APT is approached to be a 'Relevant Agency' as part of the formal safeguarding arrangements put in place by the Derby and Derbyshire, Nottinghamshire and or Nottingham City Safeguarding Children Partnerships.

1.4 Local context and scope

APT works across Derbyshire and Nottinghamshire through its place-based teams, Active Derbyshire and Active Notts. This policy covers activities carried out directly by APT and its place-based teams Active Derbyshire and Active Notts.

- APT has a strategic and co-ordination function and has limited direct responsibility for sports programme delivery. Exceptions include occasional events such as the School Games and associated training. In these events, APT has the responsibility for organising the core event services whilst other organisations (such as local authorities and schools) are directly responsible for the children and young people in their care. The roles and responsibilities for these events are set out in specific event safety manuals.
- Work is in partnership with local authorities, schools and colleges, national governing bodies of sport (NGBs), NHS and other statutory and voluntary organisations. Each local authority, NGB, sports club, or other organisation will have their own policy to follow when they organise activities. For activities that are being carried out by others on behalf of APT, minimum standards have been set which are outlined in Appendix 4.
- It is a requirement that all organisations receiving funding from APT will have an appropriate Safeguarding Children and Young People Policy and procedures in place and meet the NSPCC's CPSU standards for the sports sector. A statement will be included within funding agreements.
- This policy is designed to cover all the work with young people and relates to all employees, delivery staff and volunteers employed or deployed by APT for programmes which it supervises and controls.

For the purposes of the policy, APT staff include:

- **Employees/core team** - full and part time paid officers employed by APT. These officers do not have regular direct contact with participants however, each post will be assessed i.e. DBS requirements, on an individual basis.
- **Delivery Staff** - refers to leaders, coaches, tutors who have direct access and responsibility for children and adults, working on behalf of, but not employed by, APT.
- **Volunteers** - refers to one-off event staff that assist with events and volunteers involved in the governance of APT, its board, Active Derbyshire and Active Notts panels. These volunteers will not have unsupervised access to children and will not be working on a regular basis.

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1.5 Principles

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

- The welfare of children and young people is paramount.
- Everyone who participates in sport and physical activity is entitled to experience a safe, positive and supportive environment. Children and young people are entitled to expect activity organisers to fulfil their duty of care, to be supported and protected from abuse and poor practice.
- Children and young people, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual orientation have the right to protection from harm and the right to be treated with dignity and respect.
- Safeguarding is everyone's responsibility and it is everyone's responsibility to report any concerns about a young person. It is the responsibility of statutory agencies to determine whether abuse has taken place.
- Partners can expect that all suspicions and allegations of abuse or poor practice will be taken seriously by APT and responded to swiftly and appropriately.
- APT will design programmes with due regard to safeguarding legislation and good practice.

1.6 Commitment

In addition to the aims of the policy in 1.1 above, APT undertakes to:

- Have a board commitment to safeguarding appointing a safeguarding "champion" on the APT board and providing training/updates at board meetings.
- Board to annually review progress against the safeguarding implementation plan and number of incidents reported to APT. This policy will be reviewed annually by the Safeguarding Lead Officer and formally reviewed by the Board at least every three years or more frequently if significant changes made.
- Accept the moral and legal responsibility to implement procedures to provide a duty of care and safeguard the wellbeing of young people.
- Make sure that its employees and volunteers are carefully selected, trained and supervised and adhere to safe recruitment procedures including DBS checks where appropriate. DBS guidance on checks can be downloaded from this [link](#).
- Provide supervision and support for employees including mandatory induction and safeguarding updates at team meetings and in annual performance reviews.
- Have procedures for dealing with allegations of abuse against employees and volunteers including reporting to the LADO and referral to DBS where appropriate.
- Respond to any allegations appropriately and implement the appropriate disciplinary appeals procedure.
- Have a case management process in place to respond to safeguarding concern

- Have a whistleblowing policy.
- Make sure that any employees, contracted staff or volunteers working with children are aware of and apply relevant codes of conduct.
- Have procedures in place for E-safety.
- Advocate the 7 golden rules of Information sharing. Safeguarding is of paramount concern when considering information sharing.
- Have welfare plans in place for the School Games and other major events under APT control.
- Provide clear procedures for children and young people, parents, employees and volunteers so that they can voice their concerns if they feel unsure or unhappy about a matter concerning a child.
- Take appropriate action if a young person is identified as in need of support services/early help (rather than child protection).
- Promote minimum standards for employing/deploying coaches as set out by UK Coaching and the National Governing Bodies of sport, see links below:

Minimum Standards for Active Coaches (Information for Organisations)

<https://www.ukcoaching.org/resources/downloadables/minimum-standards-for-active-coaches>

Minimum Standards for Active Coaches of Children and Young People

<https://www.ukcoaching.org/resources/downloadables/minimum-standards-for-active-coaches-of-children-a>

2. Recruitment, employment and deployment of employees and volunteers

APT will take all reasonable steps to make sure unsuitable people are prevented from working with children and young people. APT will also make sure that employees receive regular training in safeguarding issues.

2.1 Recruitment

The organisation will undertake Disclosure and Barring Service (DBS) checks where required by law or for posts where it is appropriate to do so. All paid employees directly employed or deployed by APT who have direct contact with children and young people will be assessed for suitability to work with this age group.

- A minimum of 2 references will be taken and followed up
- Qualifications will be checked
- A Self-Disclosure form will be completed
- Roles will be assessed to see if they are eligible for a Disclosure and Barring Service (DBS) check.
- Positive disclosures will be analysed to assess suitability.

Should any concerns arise in the recruitment process, advice will be sought through APT's HR or legal advisors. If this affects any partner organisations, they will be informed in line with information sharing protocols. Where necessary, the 'duty to refer' DBS guidance will be followed if concerns arise about the suitability of employees or volunteers.

APT will encourage this practice in organisations that it works with.

2.2 Induction and Continuing Professional Development

APT will make sure:

- All new employees will undertake an induction programme. A copy of this policy, employee Code of Conduct and procedures will be included as part of the induction pack and meetings.
- All employees will undertake basic safeguarding training by either attending an appropriate course or completing an on-line module.
- Employees with designated responsibilities in relation to safeguarding will be provided with additional relevant training for this role.
- Training and/or written guidance on safer recruitment practice will be provided for those responsible for recruiting, selecting and deploying employees and volunteers.
- Employees will update their appropriate level of training every three years.

3. Monitoring and review

- APT will maintain a record of relevant staff training and required DBS checks etc. This will be reviewed as part of the safeguarding annual review. Any training or checking needs that are identified will be reported to the individual's line manager for implementation.
- Failure of employees to comply with the policy and procedures will be addressed immediately and ultimately could result in disciplinary action.
- APT will regularly review its Safeguarding Policy - Children and Young People and act as required to maintain best practice. The policy will be revised in the light of changes in the organisation's role or structure, changes in legislation and guidance, or considering learning from significant cases.
- The School Games welfare plan will be reviewed annually to take account of feedback from young people and learning from previous years.

4. Photography, film and publication of imagery

APT wants to promote positive images of children and young people taking part in physical activity. For this to take place APT recognises the need to follow certain procedures concerning the use of imagery of young people to ensure their safety. APT will use appropriate imagery of young people in hardcopy and electronic publications for media and or communication purposes.

- Images will be provided to APT for publicity purposes by the parents/carers or images will be taken by APT employees or a commissioned photographer, with the consent of the parent (e.g. for school games competitions). A sample Photography and Video consent form is available in Appendix 7
- Parental consent may be obtained on behalf of APT by the young person's school or club. As part of the consent process, it will be made clear that the image may be used for publicity purposes.
- At events organised by APT it will make sure that an agreed procedure is in place to safeguard children and young people. Details of this procedure will be documented and shared with event organisers (employees and volunteers).
- For events involving schools that are organised by APT, a consistent brief will be sent to all schools before the event which asks the school to inform APT of any young person who must not be photographed. APT will ensure that any official photographer, engaged by APT is aware of this procedure and any young person this applies to. All commissioned photographers will be required to always wear official identification.
- At events organised by APT that are attended by parents, spectators or guests, appropriate guidance will be displayed and or circulated at the event. It is expected that those who wish to take photographs will read and comply with this guidance.
- At the Derbyshire and Nottinghamshire School Games events where, extra staff are in support, all parents or spectators wishing to take photographs will be required to register their details and have identification to show that they have permission to do so. For written guidance on the types of image to take and how they should be used, see Appendix 6.
- APT core team are aware of the need to select the image to use carefully and not to publish identifiable details of the young person, when not appropriate. An exception to this is for young elite athletes where permission is explicitly sought from parents, to publish their name, achievements, future competitions etc.

5. E- Safety and Use of social media

APT uses its website and various social media platforms e.g. Facebook, Twitter, Instagram and YouTube to promote the opportunities and benefits of taking part in sport and physical activity, the work of APT, its place teams Active Derbyshire and Active Notts and its partners. Guidelines on the correct use of social media have been produced for employees to follow to ensure that a professional image and safe environment is always presented online. The APT Acceptable Use of Social Media Policy and Employee/ Representative Social Influence Marketing Guidelines is set out in Appendix 5.

Any members of the APT team using virtual meeting platforms e.g. Zoom, Teams etc to consult with young people will be expected to follow the APT guidelines, see Appendix 18 (to be drafted)

6. Commissioning Services

APT will make sure that any grant or service level agreement with third partner organisations will specify minimum operating standards that are required to be met as part of the agreement. Where possible partners compliance with this will be checked as part of sample observations to ensure that they are meeting the standards specified. Minimum operating standards for Safeguarding are detailed in Appendix 4.

7. Accountability

Many of the projects that APT sets up or contributes to involve two or more organisations, each with their own safeguarding policies and procedures. For example, a local authority, a School Sports Partnership, a sports club, a voluntary organisation, or a school. APT will ensure that in the project planning stage of a partnership project, there is agreement on which organisation's Safeguarding Children and Young People Policy and procedures will be followed in the event of a concern arising. This agreement will be recorded and shared with all relevant parties.

8. Dealing with allegations

It is not the responsibility of APT employees to individually decide whether abuse or poor practice is occurring. That is a task for the professional child protection agencies. However, it is the responsibility of APT employees to report any concerns they have, or are reported to them by others, to the appropriate agencies. This includes any concerns reported to them about members of the APT core team or volunteers working on our behalf.

APT will deal promptly and appropriately with any reported or observed incidents/concerns of abuse or poor practice, following the procedures set out in the Incident Reporting Flow Chart (Appendix 2).

Any APT employee who has concerns for, or is made aware of concerns for a young person who is in need of support/early help (i.e. a child in need of additional services rather than child protection) should log this concern on the Safeguarding Concern Report Form (Appendix 1) and pass on to the APT Safeguarding Lead for follow up. This will involve an initial conversation with the relevant children services department for advice on whether a referral should be made and parental consent obtained.

All employees will be provided with copies of the Incident Reporting Flow Chart (Appendix 2) and Safeguarding Concern Report Form (Appendix 1). The Incident Reporting Flow Chart and Safeguarding Concern Report Form will be reviewed annually and if changes made, recirculated to the whole team and as part of staff training.

Detailed advice about how to respond to allegations and concerns is provided in Appendices 1, 2 and 3 to this document. Information is also available on APT's shared work areas and the [website](#)

If any core team member or volunteer, who having reported a safeguarding issue to the Safeguarding Lead Officer or Deputy Lead Officer, has concerns about how this report is being addressed internally by APT, should escalate their concern, by contacting, in priority order:

- The CEO
- The Board Safeguarding Lead
- CPSU (for advice on the next step to take)

If any core team member or volunteer, who having reported a safeguarding issue to the Safeguarding Lead Officer or Deputy Lead Officer, has concerns about how this report is being addressed externally by other agencies e.g. children's services, or police, should escalate their concern, by contacting:

- The Safeguarding Lead Officer who will refer to CPSU for advice on how to proceed to register and process this concern.

9. Case Management

For more complex cases and for any allegations or concerns that an APT employee or volunteer may have harmed or present a risk to young people, a case management group will be brought together. This will include the Lead Safeguarding Officer, the Deputy Safeguarding Officer, the CEO, the Board Safeguarding champion (unless any of the above are implicated in the case).

For internal allegations, an external HR expert will also be brought in.

The role of the group will be to

- Ratify any actions already taken by the Lead Safeguarding Officer
- Assess and agree immediate responses
- Identify an appropriate route for case e.g. referral to a statutory agency, referral to NGB safeguarding lead. For an allegation against an APT employee, the 3 possible routes that will be considered are; policy investigation, statutory child protection investigation and internal disciplinary investigation.
- Consider the need for temporary/interim suspension order
- Review progress and learn from cases

The HR expert will be asked to provide guidance on the support required to any APT employee under investigation to ensure the employee receives fair treatment from APT during the course of the investigation. The HR expert may be engaged to provide direct support to the individual during this time.

10. Information Sharing

To make sure that children and young people are effectively safeguarded, it is important that concerns are shared with the appropriate people and agencies. APT understands that this information is likely to be highly sensitive and will follow the procedures outlined in the Incident Reporting Flow Chart Appendix 2 which details who information can/should be shared with.

APT will follow the seven golden rules for information sharing and Government guidance detailed in Appendix 8.

All hard copy confidential information will be stored in a secure location within an APT office and will only be accessible to the Safeguarding Lead Officer.

11. Support for the reporter of suspected abuse

A variety of feelings and concerns may be generated by the discovery that a member of the core team or a volunteer is, or may be, abusing a young person and this may raise concerns amongst other employees and volunteers.

APT will fully support all employees and protect anyone who, in good faith and without malicious intent, reports his or her concern about a colleague's practice or the possibility that a person may be being abused.

APT disciplinary and grievance policy and whistleblowing policies (Appendix 19) and procedures will apply. These are available as separate policy documents.

12. Record retention and storage

All completed Safeguarding Concern forms and records of action taken will be securely stored for no longer than 6 years (see exceptions below).

For reported adults who are employed by APT, records of allegations, action taken and decisions reached will be retained on file, at least until the person reaches normal retirement age or for 10 years if that is longer. This applies even after the APT employee has left APT.

For reported adults who are not employed by APT, personal information will not be held longer than 6 years after the subject's last contact with APT. Exceptions to the 6-year period will occur when records:

- Need to be retained because the information in them is relevant to legal action that has been started.
- Are required to be kept longer by law.
- Are archived for historical purposes (e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority).
- Consist of a sample of records maintained for the purposes of research.
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
- Are held to provide, for the subject, aspects of their personal history (e.g. where the child might seek access to the file later and the information would not be available elsewhere).

Disclosure and Barring Service (DBS) certificates will be stored for a maximum of 6 months.

All the above information is stored in secure confidential folders on Sharepoint with access limited to CEO, Head of Operations (who is Safeguarding Lead) and Business Support Lead. Any information which needs to be shared with an external agency will be password protected.

APT will minimise the collection of any personal information about individual children and young people (e.g. name, school, academic year, etc.) in the process of organising an event. This information will be held for the minimum time required and will then be securely disposed of, unless there is a specific safeguarding issue that requires the information to be kept for longer.

Any information retained or archived will be securely transferred to any successor body to APT.

13. Employee declaration

All employees of APT will be required to sign a sign off sheet to record that they have taken the time to thoroughly read this Safeguarding Children and Young People policy, code of conduct and procedures. This will be submitted to the Lead Safeguarding Officer for retention. By being made aware of the policy, it is our intention to make sure that **all** employees are pro-active in providing a safe environment for young people to participate in sport organised by APT or by partners.

Any disciplinary measures or complaints arising because of this policy will be dealt with in accordance with APT disciplinary procedures.

If you have any concerns about the welfare or safety of a child, you must follow the steps set out in this policy document.

14. Abbreviations

The following terms and abbreviations may be used throughout this document:

APT	Active Partners Trust
SLA	Service Level Agreement
NSPCC CPSU	National Society for the Prevention of Cruelty to Children - Child Protection in Sport Unit
NGB	National Governing Body of sport
The organisation	Active Partners Trust
DBS	Disclosure and Barring Service
LA	Local Authority
LADO	Local Authority Designated Officer

The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicates they are unsuitable to work with children

Policy approved by APT Board - 21/09/2023

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Appendix 1 Safeguarding Concern Form

Always complete this form as soon as possible for any incident you witness or is reported to you.

Listen to what has been said, ask open questions, reassure and do not judge. Once completed, pass on securely to the APT Safeguarding Lead or Deputy Officer for action.

Use the form below as a prompt to collect as much information as is available. Clearly identify whether recorded information is FACT, HEARSAY or OPINION.

Your name:	Date:
Organisation:	Email:
Address:	Telephone numbers:
Child's name:	Gender: M F
DoB or age:	Does the child have a disability? <i>Please state</i>
Child's ethnic origin	
Parent's/Carer's details if known	
Name:	Email:
Address:	Telephone numbers:
Have the parents/carers been notified of the incident Y N If yes, please record what was said/action agreed	

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Are you reporting your own concerns or reporting concerns raised by someone else?	
My own concerns	Responding to concerns raised by someone else
If responding to concerns raised by someone else, please provide further info:	
Name:	Email:
Position within sport/organisation or relationship with child:	Telephone numbers:
<p>Details of incident or concerns Include all info such as description of any injuries, description of behaviour, whether you are recording the incident as fact, opinion or hearsay.</p>	
Dates and times of incident:	Location(s) of incident:

Child's account of incident:	
Any witness accounts of the incident? Provide details:	
Witness's details if known	
Name:	Email:
Position within sport/organisation or relationship with child: <i>Date of birth if child</i>	Telephone numbers:

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Details of any person involved in this incident or alleged to have caused incident/injury:	
Name:	Email:
Position within sport/organisation or relationship with child:	Telephone numbers:
Provide details of any action taken to date:	
Has the incident been reported to any external agencies Y N If Yes please provide further details	
Name of person:	Email:
Organisation:	Telephone numbers:
Agreed action or advice given:	
Your signature:	

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Your action = Contact the Active Partners Trust (Active Derbyshire, Active Notts) Safeguarding Officer if available or follow the Active Partners Trust reporting flow chart.

Info passed on to APT Safeguarding Officer

Date	Action agreed

Feedback provided to referrer by APT Safeguarding Officer.

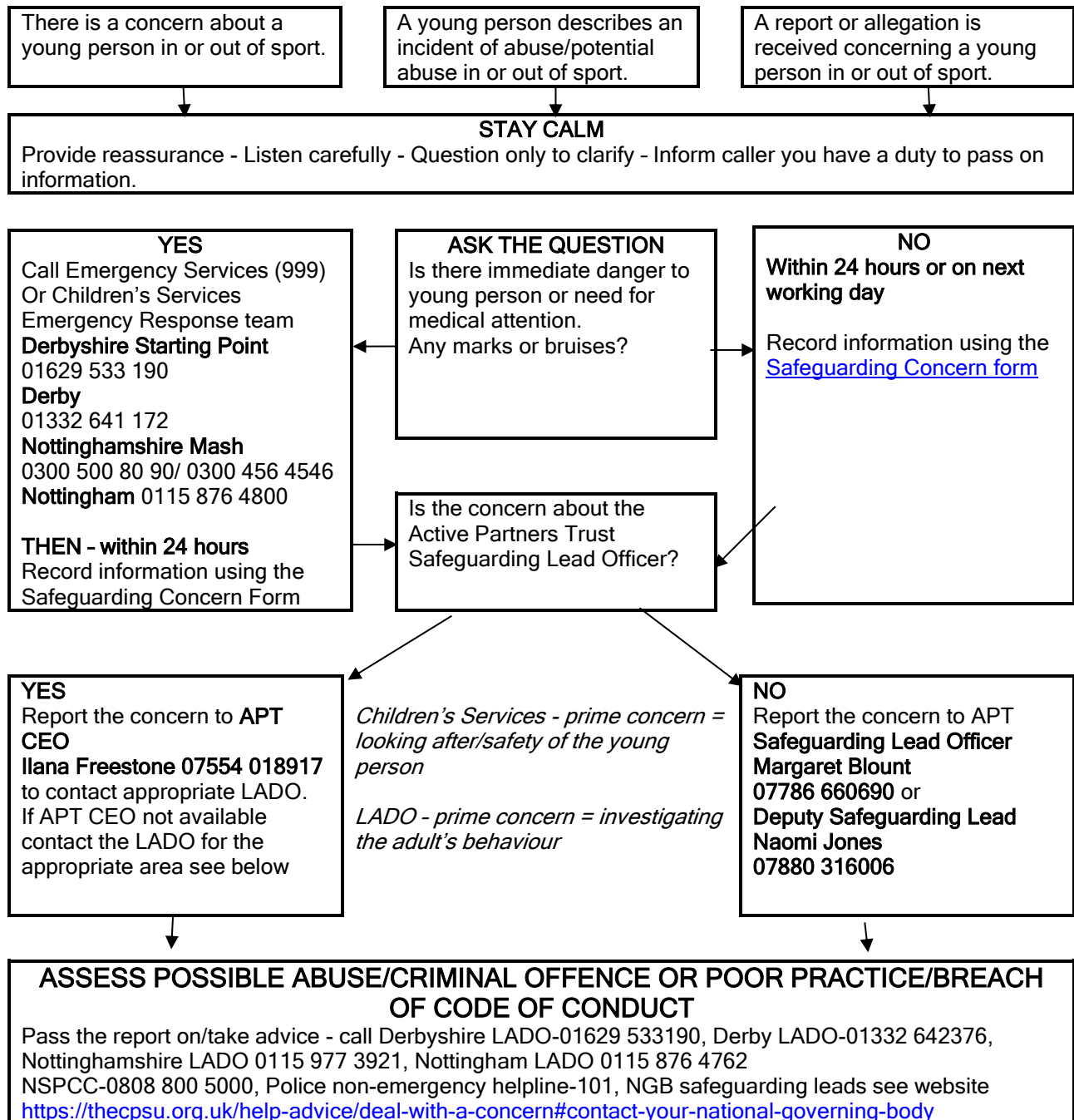
Feedback to be provided on a need to know basis. No detail - who was spoken to and where it has been referred to.

Date	Action agreed

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Appendix 2 Incident Reporting Flowchart



ACTIVE PARTNERS TRUST SAFEGUARDING LEAD OFFICER OR CEO TO TAKE FURTHER ACTION

- Seek consent from parent/carers to share information unless it places the child at risk of harm. If unsure, seek advice from LADO (for someone in position of trust) Consult with case management group for concerns about parent/carer.
- Where allegation is against an APT employee, consult with **APT CEO or Board lead** and relevant LADO to agree appropriate action. If allegation in sport, inform NGB safeguarding officer.
- Where allegation is against a person associated with APT but not an APT employee, consult with LADO and relevant statutory/employing body e.g. school. If allegation in sport, inform NGB safeguarding officer.
- Where allegation is against an individual in sport but not connected with APT, consult with the LADO and NGB safeguarding officer.
- Where allegation/concern out of sport, consult with the LADO

POSSIBLE ABUSE

Secure and record their commitment to refer to statutory agencies. Seek confirmation, within 24 hrs, that this has happened. Follow up in writing within 24 hrs. Pass Safeguarding Concern Report form and records of all conversations to APT Safeguarding Lead Officer for filing.

POOR PRACTICE

Record actions and plans agreed. Minute the conversation, follow-up in writing within 24 hours. Pass Safeguarding Concern Report form and records of all conversations to APT Safeguarding Lead Officer for filing.

Contact numbers in Derbyshire and Nottinghamshire

Derbyshire County Council

Derbyshire Children's Services Starting Point **01629 533 190** choosing the option for urgent child protection calls any time or submit online request
<https://www.derbyshire.gov.uk/social-health/children-and-families/support-for-families/support-for-families-and-early-help.aspx>
 Derbyshire Police call centre number **101** anytime
 Local Authority Designated Officer **01629 533 190**

Derby City Council

Derby City Children's Services First Contact Team **01332 641 172** 9am - 5pm
 or by secure email ashmail@derby.gcsx.gov.uk
 Careline **01332 786 968 at any time**
 Derbyshire Police **101** anytime or **0845 123 33 33** (if the child is not in immediate need of protection)
 Local Authority Designated Officer **01332 642 376** or secure email
CYPsafeguarding@derby.gcsx.gov.uk

Nottinghamshire County Council

Children's Social Care - MASH **0300 500 80 90** 9am - 5pm or by secure email
mash.safeguarding@secure.nottscc.gov.uk
 Emergency duty team **0300 456 4546** anytime
 Nottinghamshire Police **101**
 Local Authority Designated Officer **0115 977 3921**.

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Nottingham City Council

Children's Social Care 0115 876 4800 anytime or by secure email
candf.direct@nottinghamcity.gcsx.gov.uk
Nottinghamshire Police 101
Local Authority Designated Officer 0115 876 4762

Active Partners Trust

Active Partners Trust nominated Lead Officer for safeguarding is:
Margaret Blount
Head of Operations
Tel: 07786 660690
Email: margaret.blount@activepartnerstrust.org.uk

Deputy Lead Officer is:

Naomi Jones
Programmes Lead
07880 316006
Email: naomi.jones@activepartnerstrust.org.uk

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Appendix 3

Responding to Disclosures, Allegations and Concerns

1. Responding to Disclosure–The Do's

- Stay Calm
- Listen - give the child time to say what he/she wants. Pay particular attention to any spontaneous statement. In the case of children without speech or with limited language, pay attention to their signing or other means of expression, including behaviour and play.
- Reassure - tell the child that they have done the right thing, and that the abuse is not their fault;
- If the child is in immediate danger, call emergency services (999) or the relevant county or city emergency response team.
- Record in writing - as soon as possible document the conversation accurately using the Safeguarding Concern Report Form. (Appendix 1)
- Report - to the Safeguarding Lead /Deputy Safeguarding Lead for guidance or to continue the procedure
- Seek consent from parents/carers to share information unless it places the child at risk of harm.
- Record - confirm referrals in writing, using the Safeguarding Concern Report Form. Also record concerns and the actions taken on any own internal records.
- This is a useful animation to watch <https://learning.nspcc.org.uk/research-resources/2019/let-children-know-you-re-listening/>

2. Responding to Disclosure–The Don'ts

- Do not panic
- Do not promise to keep secrets
- Do not inquire into details of the abuse or question the child
- Do not make the child repeat the story unnecessarily
- Do not take responsibility for deciding whether abuse has occurred. Seek advice. The primary responsibility of the person who first suspects or is told of abuse is to report it and ensure that their concern is taken seriously.

3. Responding to Concerns

- Report all concerns and record, regardless of how concern arises. i.e. direct disclosure, observations, and allegations from third party, poor practice or possible abuse. Use the Safeguarding Concern Report Form (Appendix 1)
- Respond to own concerns through witnessing indicators or receiving information of possible abuse.
- A person may have suspicions of possible abuse (either by parents, activity staff, volunteers or other young people) but without any direct disclosure or action from the child involved. It is

essential that the same procedure is undertaken for this scenario as if responding to a disclosure from a young person. Record what has been said, heard or seen as soon as possible and follow procedures set out in the Incident Reporting Flow Chart (Appendix 2). If there is any doubt as to whether the alleged or suspected behaviour constitutes abuse, the concern must be shared with professional agencies that will be responsible for subsequent action.

- Children's Services can also be contacted for support in relation to this decision making, either using anonymised information or passing on identifying details of a case. In most circumstances an agreement will be sought as to the most appropriate way to proceed, although it should be recognised that once in receipt of information relating to an identified child, Children's Services have a duty to take any action required to protect the child within their statutory responsibilities.

4. Responding to Allegations/Concerns about the Suitability of Employees or Volunteers

- Any concerns for the welfare of the child, arising from abuse or harassment by an employee or volunteer, must be dealt with in the same way as allegations against other people and reported immediately to the designated safeguarding officer.
- The person to whom the allegation is reported must treat the matter seriously using the Safeguarding Concern Report Form (Appendix 1) and the matter should be reported immediately to the Safeguarding Lead Officer. On the Concern Report Form, distinguish between fact, hearsay and opinion.
- **NB: No attempt should be made to investigate further before the discussion with the LADO. There are some circumstances where the employer should not have any discussions with the child or young person or the person about whom the allegation has been made (where there are clear child protection concerns and /or potential criminal offence has been committed).**

5. Responding to Allegations of Previous Abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by an employee or volunteer who is still currently working with children). Where such an allegation is made, the same procedures as detailed above must be followed and the matter reported. This is because other children, either within or outside sport, may be at risk from this person.

Appendix 4

Minimum Operating Standards for Safeguarding

Introduction

Children and young people have the right to be safe and enjoy the sports activities that they take part in and parents and others have a right to believe those organisations provide a safe environment.

APT has adopted the following standards which all partners will need to meet and evidence to receive funding, support and any further resources.

The Standards

Contracted organisations or individuals must have:

- A Child Protection/Safeguarding Policy and reporting process, endorsed by an NGB, LA or relevant organisation, that is shared with stakeholders. It must be clear when this policy was adopted and when it will be reviewed.
- Clear disciplinary, concerns, allegations and complaints procedures.
- Clear operating standards for holding and sharing information.
- An identified Safeguarding lead person who has a clear job description and has attended a minimum of three hours recognised safeguarding training within the last three years.
- Recruitment and selection procedures for volunteers and/or employees working with young people that include:
reference checks (minimum of two),
an enhanced DBS check with a barred list check (if a regulated activity) or
an enhanced DBS check for all people working with young people.
- Codes of conducts for employees, coaches, volunteers and participants.
- All individuals working with children have attended recognised safeguarding awareness training and hold other relevant qualifications e.g. relevant coaching level qualification for their role in this activity.
- An individual is always on site with a recognised first aid qualification.

E -safety and Photography guidelines in place.

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Appendix 5

Acceptable Use of Social Media Policy and Employee/Representative Social Influence Marketing Guidelines

Active Partners Trust encourages staff, partners, volunteers and contractors to actively engage in Social Influencing marketing activities.

With a vast number of options developing for influence online it is important that every representative of Active Partners Trust understands their responsibilities, ensuring that a professional image is presented online always. The guidelines are not designed to stifle the 'voice' but to ensure that those representing Active Partners Trust understand how to maximise the benefit for the brand, the individual and the team.

Whether you are Tweeting, Blogging, Commenting, Liking or Sharing, these guidelines apply to you!

Please read these guidelines carefully and contact katie.crockett@activepartnerstrust.org.uk if you have any queries.

Do these guidelines apply to me?

These guidelines have been developed for employees and representatives of the Active Partners Trust (Board, Volunteers, Sub Contractors) who:

- ✓ Maintain blogs - personal or professional - that mention the ACTIVE PARTNERS TRUST, associated partners (e.g. Sport England) or work associated with the ACTIVE PARTNERS TRUST.
- ✓ Post content about Active Partners Trust, associated partners or work associate with Active Partners Trust on social properties including, but not limited to: Twitter, YouTube, Facebook, LinkedIn, Instagram, SlideShare, Flickr, any public blog.

The dos and don'ts

Be professional

1. You represent Active Partners Trust at all times. As an employee please contact the owner of the appropriate HR policy if you require further clarification on your responsibilities or any action that could be deemed inappropriate within the terms of your employment contract.
2. Don't mention a specific project without first getting permission from the appropriate project/campaign manager. There may be circumstances where a privacy agreement is in place or an embargo prevents the early release of information and the project/campaign

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manager should be able to give you a definitive response on what is acceptable to release and when!

3. Communications inside Active Partners Trust team, including emails among employees, are proprietary to Active Partners Trust (The same holds true for emails among Active Partners Trust employees, representatives and our partners.) Sharing internal communications outside Active Partners Trust may result in disciplinary action. If you are interested in posting or quoting from an email publicly, please check with the sender first.
4. Respect copyright. Do not post any images or other content from another source unless you are sure it is in the public domain or that the owner has granted permission. Check website terms of service to see if the site has rules about when you may reproduce content.
5. Respect the law - including laws and regulations in the country and local jurisdictions where the information is being posted. Please be aware that many of the sites that you use will be hosted overseas.
6. Do not post material that is harassing, obscene, defamatory, libelous, threatening, hateful, or embarrassing to any person or entity. Do not post words, jokes, or comments based on an individual's gender, sexual orientation, race, ethnicity, age, or religion.
7. Posting pornography is strictly forbidden.
8. If you are uncertain about whether it is OK to post something, first talk with your manager.
9. When sharing an opposing view please adopt a professional tone at all time
Before you post something, ask yourself: how would I feel if this post were about me?
10. Social influencing requires an investment of time. Ensure that social media activity is kept in balance with the other requirements of your role.

Safeguarding

This policy is an integral part of APT's commitment to safeguarding to protect children and young people engaged in activities that APT organises or commissions including the appropriate use of information and technology.

Safeguarding for young people and adults at risk must be considered at all times when using social media as a marketing tool.

These rules must be followed to ensure that those identified as vulnerable are protected.

1. When posting images, you must have the permission of the parent or guardian of the person

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photographed to post the image, if the person is under 18. Permission may be obtained via an opt out option in which the parent/guardian will be advised that images may be posted on social media and that they need to advise in advance if they do not wish for this to happen.

2. Do not share or retweet images of people under 18 from other sources if you are unsure whether the person in the photograph has given permission for its use. Therefore, it is fine to share or retweet an appropriate image if it has been originally posted or tweeted by the person in the photo or their parent/guardian. It is also fine to share or retweet images if originally posted by that person's school or a national organisation such as Youth Sport Trust, Sport England etc. Regarding images posted by clubs, you must be confident in the club (you have knowledge of the club or they are a Clubmark club, before sharing their images). Exercise judgement in this matter and speak to the safeguarding lead if you have any concerns.
3. Monitor, where possible, comments on social media posts and pages owned by Active Partners Trust. If you spot any comments which could be considered as abusive, a screen shot of the comment should be taken, the comment should then be immediately deleted and reported to the safeguarding lead for follow up. If you are unsure whether a comment could be viewed as abusive, speak to your manager or the safeguarding lead.
4. Do not direct message a person under the age of 18 unless it is absolutely necessary. Instead contact a parent or guardian via email or phone to arrange to speak to that person. Alternatively, email the person, copying in the parent/guardian. If there is no other way to contact the person, direct message the person via the Active Partners Trust twitter account so that the message is open to be viewed by colleagues.
5. Never send or accept 'friend' requests from young people from their personal social media accounts.

Be truthful, open, and accountable

1. Never plagiarize.
2. Be truthful.
3. Be authentic. This may be a challenge in juggling personal and work accounts, but it is essential that you maintain a consistent tone and approach to avoid confusing your audiences.
4. Correct mistakes promptly.
5. Cite and link to all sources when you can.
6. Allow comments on your public content, whether a presentation on SlideShare or a Twitter post.
7. Exercise full disclosure. When you mention Active Partners Trust, identify Active Partners Trust as your employer. Reveal your personal affiliations and any conflicts of interests.

Active Partners Trust acceptable use policy for social media

In addition to the guidelines on the different platforms that follow, the acceptable use policy for social media must also be adhered to:

1. Social media includes blogs; Wikipedia and other similar sites where text can be posted; multimedia or user generated media sites (YouTube); social networking sites (such as Facebook, LinkedIn, Twitter etc); virtual worlds (Second Life); text messaging and mobile device communications and more traditional forms of media such as TV and newspapers. Care should be taken when using social networking sites at any time, either via our systems or from home
2. Inappropriate comments can adversely affect the reputation of our organisation, even if it is not directly referenced. It should be noted therefore that if comments/photographs are likely to be construed as linked to Active Partners Trust or, in more direct cases, comments about colleagues, partners/service users or our organisation could be regarded as abusive, humiliating, discriminatory or derogatory, or could constitute harassment or bullying, we will treat this as a serious disciplinary offence
3. In addition, postings to websites should not breach copyright or other law or disclose confidential information, defame Active Partners Trust or its suppliers, partners or employees, or disclose personal data or information about any individual that could breach the Data Protection Act 1998
4. Active Partners Trust does not encourage employees to write about their work in any way on your **personal social media platforms** and would prefer them not to do so. If individuals choose to do so they should not disclose our name or allow it to be identified by any details at all. Employees should be aware other organisations may read employees' personal weblogs, to acquire information on, for example, their work, service developments and employee morale. Therefore, even if Active Partners Trust is not mentioned, care should be taken with any views expressed. If writing any such blogs, employees will normally be asked to state that any personal views expressed do not necessarily reflect the views of Active Partners Trust. Links to our website are not allowed without the consent of the Marketing Strategic Lead.
5. If something is not public information, it should not be shared. The following must not be posted on social media:
 - i. photos, videos and/or sound recordings taken on our property, unless explicit written permission has been given by the Marketing Strategic Lead to do so
 - ii. photos or videos showing any employee or worker in clothing that includes our logo and that could reflect negatively on the employee, their job, their colleagues or Active Partners Trust
 - iii. our logos, trademarks, graphics, or advertising materials

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- iv. details of any kind relating to any events, conversations, materials or documents that are meant to be private, confidential or internal to Active Partners Trust. This includes manuals; procedures; training documents, non-public financial or operational information; personal information regarding other employees or partners/suppliers; anything to do with a disciplinary case, grievance or legal issue; product specifications; any other secret, confidential, or proprietary information or information that is subject to confidentiality agreements.
6. If an employee is asked to contribute to an official blog on behalf of Active Partners Trust, then the specific details will be discussed and agreed at the time
7. Note that we may from time to time monitor external postings on social media sites. Any employee who has a profile (for example on LinkedIn or Facebook) must not misrepresent themselves or their role with us. Social media sites are not an appropriate place to air business concerns or complaints; these should be raised with a manager or formally through our grievance procedure
8. It is important to note that our partners/service users' contact details and information remain the property of Active Partners Trust. Upon leaving our employment, for any reason, direct contact from our existing or prospective partners or service users should be directed to the Marketing Strategic Lead and any contacts gained whilst in our employment (including those on LinkedIn or any other networking platform) should not be used for any purposes that may be in competition with us
9. In summary, the guidance must be: "If in doubt, check and always think through possible consequences before posting, texting or discussing anything on social media."

Guidelines

Special considerations for Twitter

Active Partners Trust encourages employees and representatives of Active Partners Trust to be on Twitter. As you tweet, do remember that the guidelines mentioned in this document apply to you.

General guidelines

1. Twitter is a public micro-blog. Unless you make your account private, everything you write on Twitter can be seen by journalists, bloggers, competitors, clients, and your co-workers. If you are in doubt about whether content is appropriate for public viewing, don't post it. There are occasions where a Tweet is NOT an appropriate alternative to an email.
2. Twitter is all about sending short bursts of information. Within 60 seconds you can tweet about your personal life and your client work all in one Twitter stream. If you're going to be mixing your professional and personal life for everyone to see on Twitter, do exercise discretion.

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3. Again, a good rule of thumb: if I am mentioning something about Active Partners Trust on Twitter, would I be comfortable with a sponsor, board member, partner seeing what I wrote?
4. Exercise common sense. Someone wants to follow you on Twitter? At least find out who they are before following them back. Twitter is flooded with spammers looking for followers to build their presence.

Before you open a team Twitter account

If you are creating a group account under Active Partners Trust brand, please note:

1. Before you open a new Active Partners Trust branded account, make sure you have a strategy and a purpose that justifies a separate corporate Twitter account.
2. Please complete the Twitter biography field. Identify who you are. Cite top contributors. For example: @katiecrockett
3. Please contact Katie Crockett before you go live with any Active Partners Trust corporate account
4. When you tweet under a corporate account, it's best to sign your tweets when you can. For example: Great result for Active Partners Trust @katiecrockett

Special considerations for Facebook

Facebook is a valuable tool for Active Partners Trust. It will be of considerable use to us consumer campaigns.

General Guidelines

1. If you already have personal Facebook account, you will not be able to set up a second business account. Owning more than one account is a strict violation of Facebook policy.
2. Check privacy settings. There have been many changes to the privacy settings in recent years and it is your responsibility to ensure that your personal account is set to a suitable privacy setting.
3. Don't rely on privacy settings to keep you out of trouble. There have been many high-profile cases recently of Facebook pages being used as evidence in court. Think very carefully before posting anything on your personal profile that could be used in this way or bring Active Partners Trust into disrepute.

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4. All Active Partners Trust pages should be established as (Fan) Pages, not as accounts in their own right.
5. Please note that those posting to your fan page are also making their personal profile visible publicly. Please do not use excessive force/persuasion to get people to contribute to your pages. If you have actively encouraged them to breach their privacy settings, there could be serious repercussions.
6. When operating a fan page, it is your responsibility to ensure that swear words, defamatory or abusive comments are deleted quickly. There are several 'plug in' software applications (such as Crowdcontrolhq) which do the job for you automatically. If you do not have this type of system in place you should ensure that the admin has a routine established to act quickly where there has been a public breach.
7. Any Facebook pages established on behalf of Active Partners Trust remain under the ownership of Active Partners Trust and must be transferred/surrendered immediately on request or at the end of employment.
8. More sophisticated software programmes are used by larger brands/companies allowing staff access to accounts under company/head office supervision. If there is a security breach the company can act quickly to limit the damage. Where this is not in place a minimum of two admins must be associated with each Active Partners Trust page.
9. Improve search options. If you have more than 25 likes on your page, please remember to register the shortened URL. Please check with a manager before deciding on a title for the page (Warning: once your page has been registered and given a URL it cannot be changed).
10. As a member of Active Partners Trust you have a duty of care to ensure that you act in the best interest of the organization. This can work in favour of Active Partners Trust (i.e. in identifying opportunities on Facebook) but also act as competition (i.e. establishing competing pages). If you are unsure if an action is in the best interest of Active Partners Trust, please ask. Once a conflict has been identified you are expected to rectify the issue immediately.
11. Frequently change your password. People have a habit of using the same password for multiple accounts. There have been various scams encouraging people to sign up (using their email and passwords) allowing criminals to infiltrate social media sites such as Facebook. Change your password at least every 6 months.

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Special considerations for LinkedIn

LinkedIn is increasingly being used by brands and businesses through LinkedIn group facility. What originally began as an online CV tool for recruitment agencies, has developed into a valuable tool for marketers.

General Guidelines

1. Ensure that your personal profile is accurate and up to date.
2. Be careful who you link to. Your links have the potential to see the profiles of your key contacts and you could be opening up key partners of Active Partners Trust to spammers.
3. Post a code of conduct for any groups that you establish. Ensure that these codes of conduct are upheld by members of the group.
4. Make it clear who is eligible to join the group and be consistent in allowing people in.
5. Strongly discourage blatant advertising and change the posting setting for any frequent offenders to verify first.
6. Prior to excluding a group member, ensure that they have broken the code of conduct for the group and seek advice prior to issuing a notice of intention to decline future access to the group.
7. Ensure that you have a minimum of two admins.

Special Considerations for Active Partners Trust Bloggers

All the guidelines mentioned in this document apply to bloggers. In addition, please be mindful of these considerations:

1. Include a statement identifying that these are your own thoughts and not necessarily representative of Active Partners Trust. (“The blog reflects the views of the individual author and not necessarily the views of Active Partners Trust” will suffice.)
2. Be personal. Write as “I.” Let people know who you are and your background.
3. Be clear. If you blog, state the purpose of your blog upfront.
4. Be relevant. Keep your comments focused on the topic.

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5. Be interesting. Have an opinion.
6. Be credible. Write about what you know
7. Be responsive. Has someone posted a question for you? Follow up.
8. Do not restrict access to your blog by specific individuals or groups.
9. Do not self-censor by removing posts or comments once they are published unless they are inappropriate under these guidelines (e.g. comments that reveal confidential information).
10. Maintain your blog. Don't blog just for the sake of blogging but try to post at least once every few weeks. Over the long run, if you find yourself not posting, consider whether you should continue blogging (or become a contributor to a group blog).

Ownership

Agencies that are employed to develop content on behalf of Active Partners Trust will be expected to pass over any passwords/ access to Social Media assets on request. Any blog created on behalf of Active Partners Trust as part of your employment, as per your employment agreement, is owned by Active Partners Trust.

Privacy policy

If your blog is not in compliance with Active Partners Trust privacy policy, please contact your line manager for assistance before publishing your blog.

Additional requirements

Individual campaigns may develop additional requirements related to blogging and may be subject to certain additional requirements. It is your responsibility to familiarise yourself with any such specific policies or requirements. You should discuss your blogging plans with your manager before you start.

Examples of where the guidelines apply

- a. Emma, an AP Director operates her own personal blog regarding her insights into sport. She sometimes mentions her work for her AP.
- b. Alex, a funding lead, uses his personal Twitter account to announce that a fund is soon to launch.

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- c. Mark, an AP Comms lead, occasionally posts references about his work for his AP on his own Facebook profile.
- d. Shane, a volunteer manager, wants to launch a blog for Sport Makers. Many colleagues will be invited to contribute.
- e. George, a contractor hired to help Active Partners Trust, writes about his new assignment on his personal/ corporate blog.

Examples of where the guidelines do *not* apply

- a. Jackie, an AP Director, maintains her own blog about her passion for photography. She does not mention her work for Active Partners Trust.
- b. Louise, an AP officer, lists herself as an AP employee on her LinkedIn profile for information but does not discuss her work or partners that she works with.
- c. Several AP leads form their own forum to discuss their passion for travel, but they do not discuss work.

Got Suggestions?

How can we make these guidelines better?

Please contact Katie Crockett (Katie.crockett@activepartnerstrust.org.uk) with your ideas.

Thank you, and thanks to CityDesk Sport and CSPN for allowing us to reproduce this policy for Active Partners Trust

This policy and guideline document was revised November 2018 and is due for revision Dec 2021.

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Appendix 6

Guidance on use of photography and video

Introduction

In the work of APT, photography and video using camera and mobile devices may be taken by:

1. APT employees and or volunteers (Group 1)
2. An official photographer engaged by APT (Group 2)
3. School Staff (Group 3)
4. Participants, guests, parents, spectators at the event (Group 4)

These guidelines will be shared with and followed by Groups 1, 2 and 3. APT will display and/or circulate appropriate guidance at events for participants, guests, parents and spectators (Group 4). Group 4 should not be stopped from taking photographs or video however APT must always be mindful of the need to safeguard the welfare of young people.

Consent of the young person to be photographed

- Consent should be in place from the young person and or their parents to be photographed and for the photographs to be shared and or published. For school pupils, this consent can be confirmed by the school and may be obtained by the school on an annual basis. For elite athletes, this consent should be from the young person or parent (dependent on age) and can be obtained on an annual basis or prior to or at the event.
- Every effort should be made not to capture any image of a young person where consent has not been given.
- No photographs should be shared or published of a young person where consent has not been given.
- Personal information which can lead to a child being identified should never be used. If it is necessary to name a child, APT must check that written parental consent is in place and that parents have been informed as to how the image will be used. This is particularly important when issuing press releases.
- For the Derbyshire and Nottinghamshire School Games events, specific events guidelines will be drawn up.
- A sample Photography and Video Consent form is available in Appendix 7.

Permission for the photographer

- Group 1, 2 and 3 photographers will be identified by either introduction or by wearing official identification.
- For the Schools Games events, members of Group 4 who wish to take photographs will be required to register their details and wear identification to show that they have permission to do

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- so. If a member of Group 4 refuses to register their details, permission will not be given. If seen taken photographs, the individual will be asked to stop and may be asked to leave the event.
- At other events appropriate guidance will be displayed and or circulated to members of Group 4 about taking photographs at the event.
- People with no connection to the event will not be allowed to photograph - staff will question anyone they do not recognise who is using a camera, a camera on a mobile phone and or video recorder.

Sharing and publication of imagery

- Only APT, approved partners and school staff should publish appropriate photographs in public places (including websites and social media).
- Group 4 must be advised that for safeguarding reasons they should not share or publish any images (on websites, social media, newsletters etc.) if the image includes any identifiable young people, other than their own child.

Guidance on imagery taken

- Images should positively reflect the young person's involvement in the activity and promote the best aspect of the sport.
- Children and young people must be appropriately dressed when being photographed. It is never acceptable to capture any images in changing rooms, showers or at any time when players are dressing. Images should be neither sexual, of an exploitative nature nor open to misinterpretation or misuse
- For some sports (e.g. swimming, gymnastics) the potential for images to be misused is greater than for other sports. With these sports the content of the photograph or video should focus on the activity rather than a particular child and should avoid full face or body shots.

APT will delete all photographic images and video content after a 2-year period from our image library.

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Appendix 7

Photography and Video Consent Form

Active Derbyshire and Active Notts, on behalf of Active Partners Trust, need your permission before we take any images or filming of you or your child for promotional purposes. Please answer the questions below, then sign and date the form.

Event/location			
Date			
Media type			
Name of participant			
Name of parent/guardian (if participant is 18 years of age or under)			
Email address			

Please specify below where images/video of you may be used:

	Yes	No		
Printed promotional publications				
Advertising				
Website				
Social Media				
Promotional videos				
Signature of participant			Date	
Signature of parent/guardian (if participant is 18 or under)			Date	

Please note that your personal information, including images of you, will be collected and processed by us as detailed in our privacy notice available on [Making our Move website](#)

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Appendix 8

Seven Golden Rules for Information Sharing

1. Remember that the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest

Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead if you are in any doubt about sharing the information concerned without disclosing the identity of the individual where possible.

4. Share with consent where possible and where possible, respect the wishes of those who do not consent to having their information shared. Under UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being

Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure

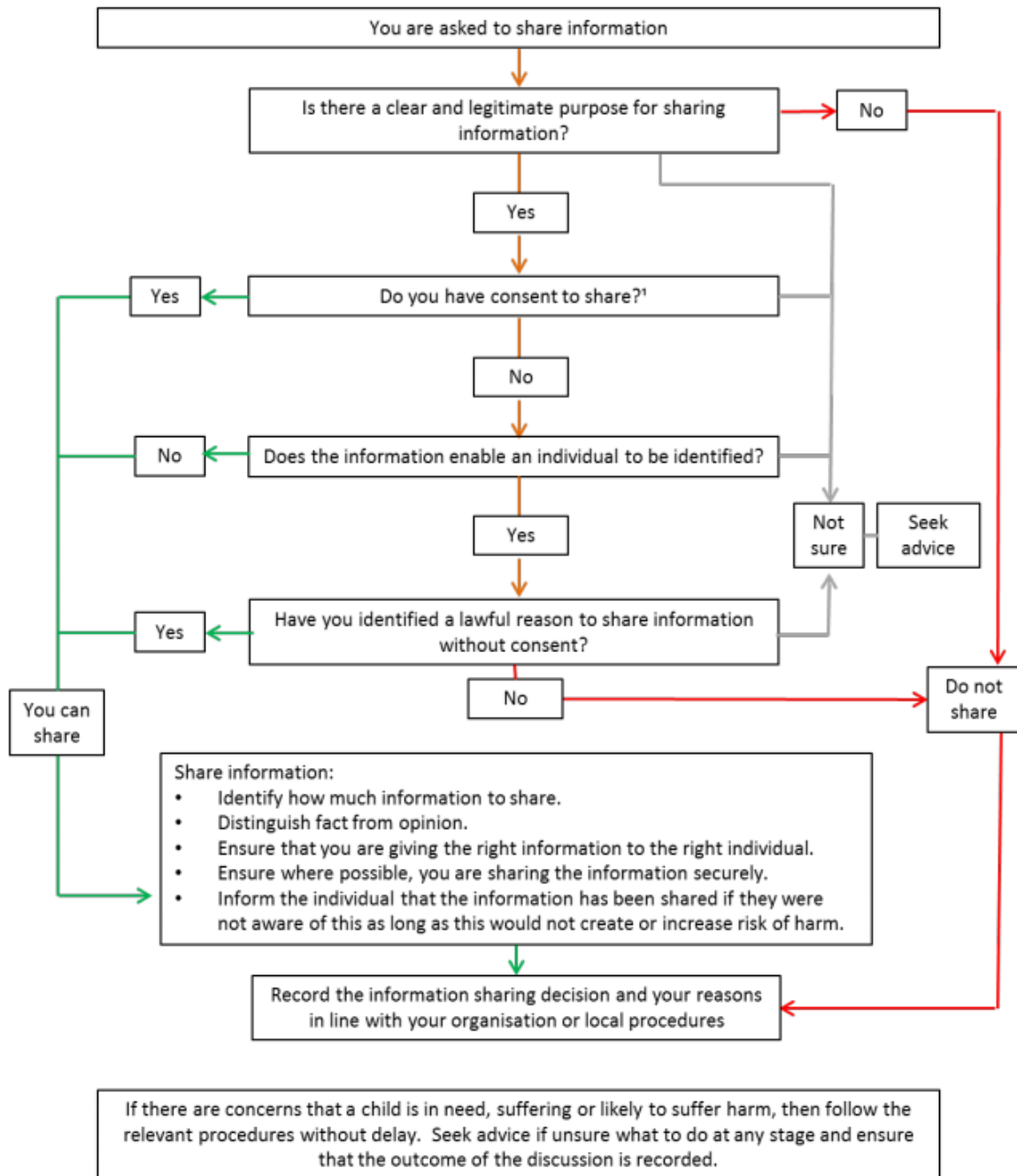
Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. Keep a record

Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Follow the Flowchart of Key Questions for Information sharing in Appendix 8

Appendix 8 (continued) Flowchart of Key Questions for information sharing



1. Consent must be unambiguous, freely given and may be withdrawn at any time

Appendix 9 Types of Abuse

Disabled Young People

Children with disabilities are at increased risk of abuse. Various factors contribute to this, such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves, or adequately communicate that abuse has occurred.

Black, Asian and Minority Ethnic Young People

Individuals from black and minority ethnic groups are at increased risk of abuse. In addition, they may have experienced harassment, racial discrimination and institutional racism.

Neglect and Abuse

Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day to day lives. These threats can take a variety of different forms including:

- neglect
- sexual, physical and emotional abuse
- exploitation by criminal gangs and organised crime groups
- trafficking
- online abuse
- sexual exploitation
- extremism leading to radicalisation.
- **Neglect** - This is the on-going failure to meet a child's basic needs and the most common form of abuse. A child may be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger and can have long term effects on their physical and mental wellbeing. There are 4 types of neglect; physical, educational, emotional, medical.
- **Physical abuse** - This is when someone hurts or harms a child or young person on purpose. It includes:
 - hitting with hands or objects
 - slapping and punching
 - kicking
 - shaking
 - throwing
 - poisoning
 - burning and scalding
 - biting and scratching

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- breaking bones
- drowning
- making up the symptoms of an illness or causing a child to become unwell

Examples of physical abuse in sport may be when the nature and intensity of training and competition exceeds the capacity of the child's immature and growing body; where drugs are used to enhance performance or delay puberty.

- **Sexual abuse** - When a child or young person is sexually abused, they are forced or tricked into sexual activities. They may not understand that what is happening is abuse or that it is wrong. There are 2 types of sexual abuse:
 - contact abuse is where an abuser makes physical contact with a child
 - non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or on-line.
- **Emotional abuse** - is any type of abuse that involves the continual emotional mistreatment of a child. It can involve deliberately trying to scare, humiliate, isolate or ignore a child. It is often part of other kinds of abuse.
- **Criminal Exploitation** is where children and young people are manipulated and coerced into committing crimes. It can involve gangs. Not every 'gang' is criminal or dangerous, but gang membership can be linked to illegal activity. Organised criminal gangs can be involved in trafficking, drug dealing and violent crime. This may include County Lines activity.
- **Trafficking** is where children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children may be trafficked into the UK from overseas or may be trafficked around the UK. They are trafficked for:
 - sexual exploitation
 - benefit fraud
 - forced marriage
 - domestic slavery
 - forced labour in factories or agriculture
 - committing crimes like begging, theft, moving drugs.
- **Online abuse** this is any type of abuse that happens on the internet, across any device connected to the web and includes
 - social media
 - text messages and messaging apps

- emails
- online chats
- online gaming
- live streaming sites

Children can be at risk online from people they know or from strangers. It might be part of other abuse which is offline e.g. grooming or bullying or it might only happen online.

- **Sexual exploitation** is a type of sexual abuse. The child is likely to be given gifts, money, status, affection in exchange for performing sexual activities. They are often tricked into believing they are in a loving and consensual relationship - grooming. They may trust their abuser and not understand that they are being abused.
- **Radicalisation** This can be very hard to spot and signs include:
 - isolating themselves from family and friends
 - unwillingness or inability to discuss their views
 - increased levels of anger
 - talking as if from a scripted speech
 - a sudden disrespectful attitude towards others
 - increased secretiveness, especially around internet use.

Bullying

In some cases of abuse, it may not always be an adult abusing an individual. The abuser may be a young person, for example in the case of bullying. Bullying is deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to defend themselves.

Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons - being overweight, physically small, having a disability or belonging to a different race, faith or culture.

The competitive nature of sport makes it an ideal environment for the bully. The bully in sport can be:

- A parent who pushes too hard
- A coach who adopts a win-at-all costs philosophy
- A player who intimidates inappropriately
- An official who places unfair pressure on a person

Bullying can include:

- Physical: e.g. hitting, kicking and theft of belongings
- Verbal: e.g. name-calling, constant teasing, sarcasm, racist or homophobic taunts, threats, graffiti and gestures.

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- Emotional: e.g. tormenting, ridiculing, humiliating and ignoring.
- Sexual: e.g. unwanted physical contact, insinuations or abusive comments.
- Online intimidation; offensive postings; photos etc.

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Appendix 10

Possible signs of child abuse

Child abuse can manifest itself in many ways. Indications that a child is being abused may include the following:

- Unexplained or untreated bruising, injuries or illness.
- Suffering continual stomach pains or other physical ailments without medical explanation.
- Any delay in seeking medical assistance or indeed none being sought at all, could be an indicator of abuse.
- Explanation of an injury is vague, lacking in detail, inconsistent with the injury or varies with each telling.
- Aggressive or withdrawn behaviour and refusal to talk about the injuries. Children and young people who are being abused often do not say what is happening to them.
- Unexpected fear of an adult and flinching when touched.
- Fear of going home to parents/carers or of them being contacted.
- Inappropriate responses from parents or carers.
- Wariness, fear or watchfulness in a child's interaction with its parents or carers.
- Indications or a history of domestic violence. Violence towards adults may also indicate violence towards children and is itself emotionally abusive.
- Sexually explicit behaviour and language.
- Considerable amounts of money, the source of which cannot be explained.
- Changes over time of manner and appearance, such as losing weight, becoming dirty and dishevelled, being constantly tired and always hungry.
- Telling you about being asked to keep a secret or dropping other hints and clues.

It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is taking place. It is not the responsibility of those working in sport to decide that child abuse is occurring, but it is their responsibility to act on any concerns by reporting them.

Appendix 11

Examples of Good Practice for Employees and Volunteers

The following are examples of good practice for employees and volunteers when working with young people.

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging an open environment (e.g. no secrets)
- Treat all young people/adults equally, and with respect and dignity.
- Always put the welfare of each young person first, before winning or achieving goals.
- Maintain a safe and appropriate distance with performers (e.g. it is not appropriate to have an intimate relationship with a child or to share a room with them)
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Make sport fun, enjoyable and promote fair play.
- Ensure that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the NGB. Care is needed as it is difficult to maintain hand positions when the child is constantly moving. Young people and parents should always be consulted and their agreement gained.
- Keep up to date with the technical skills, qualifications and insurance in sport.
- Involve parents wherever possible (e.g. for the responsibility of their children in the changing rooms). If groups must be supervised in the changing rooms, parents/teachers/coaches/officials will always work in pairs.
- Ensure that if mixed teams are taken away, they will always be accompanied by a male and female member of staff.
- Ensure that at tournaments or residential, adults will respect the privacy of young people but reserve the right to enter young people's rooms in exceptional circumstances.
- Be an excellent role model - this includes not smoking or drinking alcohol in the company of young people.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Recognise the developmental needs and capacity of young people and disabled adults - avoiding excessive training or competition and not pushing them against their will.
- Secure parental consent in writing to act in loco parentis if the need arises to give permission for the administration of emergency first aid and/or other medical treatment. Keep a written record of any injury that occurs, along with the details of any treatment given.

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Appendix 12

Practice to be avoided

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of someone in charge of the activity or the child's parents. For example, a child sustains a minor injury and needs to go to hospital.

- Avoid spending time alone with children away from others.
- Avoid transporting children in a vehicle alone.

Practice never to be sanctioned

You should never:

- take children to your home where they will be alone with you
- engage in rough, physical or sexually provocative games, including horseplay
- share a room with a child
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, even in fun
- reduce a child to tears as a form of control
- allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- do things of a personal nature for children that they can do for themselves

If any of the following incidents should occur, you should report them immediately to another colleague and make a written record of the event. Parents should also be informed of the incident:

- if you accidentally hurt a child or young person
- if he/she seems distressed in any manner
- if a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done.

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Appendix 13

Active Partners Trust Safeguarding Code of Conduct for employees and volunteers

We are fully committed to safeguarding and promoting the well-being of all participants, athletes, coaches, volunteers, parents and all others associated with APT, Active Derbyshire and Active Notts activities.

It is important that all those involved should, always show respect and understanding for the welfare of others.

All employees and volunteers must:

- Respect the rights, dignity and worth of every person and will treat everyone equally regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and socio-economic status.
- Consider the well-being and safety of participants before the development of performance.
- Make sure all activities are appropriate to the age, ability and experience of those participating.
- Display consistently high standards of behaviour and appearance, dressing suitably and not using inappropriate language.
- Never consume alcohol, smoke or use illegal drugs or substances immediately before, during or after an APT activity.
- Never exert undue influence over participants to obtain personal benefit or reward.
- Never condone rule violations.
- Ensure that coach/participant ratios are met.
- Ensure neutrality in all activities.
- Arrive in plenty of time to set up activities and ensure that risk assessments are undertaken.
- At the outset, clarify with participants (and where appropriate) their parents/carers exactly what is expected of them and what they can expect from APT

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- Never transport young people in your own vehicle and do not arrange transportation for young people in private vehicles.
- Consider the appropriateness of any virtual connections e.g. using Teams or Zoom for consultation, competition, coaching etc. Discuss if and how with APT Safeguarding Lead or Deputy Safeguarding Lead before making any arrangements/commitments. Any virtual activity will need to be approved by Safeguarding or Deputy Safeguarding Lead and suitable procedures/process in place.
- Always report any incidents, referrals or disclosures immediately following appropriate guidelines set out in the APT Safeguarding Children and Young People Policy.
- Ensure that only necessary and relevant confidential information is shared when required. Follow seven golden rules for information sharing detailed in the APT Safeguarding Children and Young People Policy.
- Be aware that discriminatory, offensive and violent behaviour will not be tolerated and all complaints will be acted upon.
- Build balanced relationships based on mutual trust which empowers young people to share in the decision-making process.
- Maintain a clear boundary between friendship and intimacy with participants. A relationship must not develop with a participant aged under 18 years and it is a criminal offence to develop a relationship with a participant aged under 16 years.

Failure to abide by the code of contact and all other policies and guidelines will result in disciplinary action being implemented.

Signature of employee	
Print name of employee	
Date	

Appendix 14

Active Partners Trust Safeguarding Code of Conduct for young people

We are fully committed to safeguarding and promoting the well-being of all participants, athletes, coaches, volunteers, parents, and all others associated with APT, Active Derbyshire and Active Notts activities.

It is important that all those involved should always show respect and understanding for the welfare of others.

All young people are expected to:

- Be loyal and give your friends/team members a second chance.
- Be friendly and particularly welcoming to new people.
- Be supportive and committed to other team members, offer comfort when required.
- Keep yourself safe.
- Report inappropriate behaviour or risky situations.
- Play fairly and be trustworthy.
- Show appropriate loyalty and be gracious in defeat.
- Respect opponents.
- Not to cheat or be violent and aggressive.
- Make your event/club a **fun** place to be.
- Keep within the defined boundary of the playing/coaching area.
- Behave and listen to all instructions from the coach. Play within the rules and respect the official and their decisions.
- Show respect to other youth members/leaders and show team spirit.
- Take care of equipment owned by the club/coach/organiser.
- Respect the rights, dignity and worth of every person and treat everyone equally regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and socio-economic status.
- Refrain from the use of bad language or racial/sectarian references. This includes bullying using texting, and social media.
- Not get involved in inappropriate peer pressure and push others into something they do not want to do.
- Refrain from bullying or persistent use of rough and dangerous play.
- Keep to agreed timings for training and competitions or inform their coach or team manager if they are going to be late.

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- Wear suitable kit for training and match sessions, as agreed with the coach/team manager.
- Pay any fees for training or events promptly.
- Not smoke on site or whilst representing the team/club/school at competitions.
- Not consume alcohol or drugs of any kind on site or whilst representing the team/club/school.

Young People have the right to:

- Be safe and happy in your chosen activity.
- Be listened to.
- Be respected and treated fairly.
- Privacy.
- Enjoy your sport in a protective environment.
- Be referred to professional help if needed.
- Be protected from abuse by other members or outside sources when face to face and when on-line.
- Participate on an equal basis, appropriate to your ability.
- Experience competition and the desire to win.
- Be believed.
- Ask for help.
- Have any concerns taken seriously and acted on.

Any minor misdemeanours and general misbehaviour will be addressed by the coach/organiser and reported verbally to the designated person. More serious or persistent misbehaviour may result in disciplinary action and potentially dismissal from the event/club/sport. Parents will be informed at all stages.

Signature of young person	
Print name of young person	
Date	
Signature of parent/carer	
Print name of parent/carer	
Date	

Appendix 15

Active Partners Trust

Safeguarding code of conduct for parents and carers

We are fully committed to safeguarding and promoting the well-being of all participants, athletes, coaches, volunteers, parents and all others associated with APT, Active Derbyshire and Active Notts activities.

It is important that all those involved should, always show respect, and understanding for the welfare of others.

As parents or carers, you are expected to:

- Promote your child's participation in playing sport for fun.
- Be realistic and supportive.
- Do not place your child under pressure or push them into activities they do not want to do.
- Complete and return the Registration, Medical and Consent Form pertaining to your child's participation in the event/competition/club. Any changes in the state of your child's health should be reported to the coach/school/event staff prior to the activity.
- Deliver and collect your child punctually before and after sessions/matches/the event or if young person is making their own way, encourage them to be punctual.
- Inform the organiser prior to the activity starting if your child is to be collected early.
- Ensure your child has clothing and kit appropriate to the weather conditions and for activity, including required protective equipment, showering kit and adequate food and drink.
- Ensure that your child understands their code of conduct.
- Encourage your child to play by the rules and teach them that they can only do their best.
- Accept the official's judgment and do not enter the field of play
- Behave responsibly on the side-line; do not embarrass your child.
- Show appreciation and support the coach/school/event staff.

As a parents/carer you have the right to:

- Be assured that your child is safe while taking part in sport whether face to face or on-line.
- Be informed of problems or concerns relating to your child.
- Be informed if your child is injured.
- Have your consent sought for issue such as trips or photography.
- Have any concerns about any aspect of your child's welfare listened to responded to.

Any breaches of this code of conduct will be dealt with immediately by the coach/organiser and reported verbally to the designated person. Persistent concerns or breaches may result in you being asked not to attend sessions if your attendance is considered detrimental to the welfare of young participants. The ultimate sanction should you continue to breach this code if that you may be asked to withdraw your child from the session.

Signature of parent/carer	
Print name of parent/carer	
Date	

Appendix 16

Active Partners Trust Safeguarding code of conduct for coaches, leaders and volunteers

We are fully committed to safeguarding and promoting the well-being of all participants, athletes, coaches, volunteers, parents and all associated with APT, Active Derbyshire and Active Notts activities.

It is important that all those involved should, always show respect, and understanding for the welfare of others.

All coaches and volunteers are expected to:

- Make the sport/activity **fun**.
- Follow the guidelines of your NGB, employer or organisation.
- Hold appropriate valid qualifications and insurance cover and only coach to the level that you are qualified.
- Ensure the safety of all children by careful supervision, proper pre-planning of coaching sessions, always using safe methods, tailored to suit the abilities of the participants.
- Ensure the physical environment and equipment are safe and minimise any risks.
- Take time to explain coaching techniques to ensure they are clearly understood.
- Encourage and guide the young people to accept responsibility for their own performance and behaviour.
- Respect the young person's opinion and allow them to engage in the decision-making processes.
- Communicate and feedback to young people with respect.
- With the consent of the young person, talk to other coaches/organisations to benefit the participant.
- Appreciate the efforts of all young people and not over-train the young people. Never exert undue influence over performers to obtain personal benefit or reward.
- Be positive, approachable and offer praise to promote the objectives of the organisation/session/club at all times.
- Respect the rights, dignity and worth of every person and will treat everyone equally regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and socio-economic status.
- Encourage all young people not to discriminate on the grounds of religious beliefs, race, gender, sexuality, social classes or lack of ability. Challenge any form of discrimination.
- Not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour.
- Be a role model, displaying consistently high standard of language, behaviour and appearance (disciplined/committed/time keeping), remember children learn by example.

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- Never smoke, drink alcohol or use recreational drugs during coaching sessions, competitions or other activities.
- Never condone rule violations, rough play or the use of prohibited substances.
- Not let any allegations of abuse of any kind to go unchallenged or unrecorded.
- Report all accidents or incidents of alleged abuse or poor practice to the designated person following the organisation's procedure/reporting process.
- Maintain confidentiality about sensitive information.
- Administer minor first aid in the presence of others and where required refer more serious incidents to the club "first aider".
- Have access to telephone for immediate contact to emergency services if required.
- Maintain a clear boundary between friendship and intimacy with participants.
- Not abuse young people physically, emotionally or sexually.
- Avoid all unnecessary physical contact with a participant.
- Protect yourself from false accusations by:
 - not spending excessive amounts of time alone with young people away from others, face to face or on-line,
 - not administering First Aid involving the removing of the young person's clothing unless in the presence of others.
- Never transport young people in your own vehicle and do not arrange transportation for young people in private vehicles.
- Consider appropriateness of any direct communication by email, text, telephone with young people. Standard procedure should be to copy parents/carers/teachers into the communication. Direct one to one contact should be by exception only and you must share with your line manager and or relevant colleague that one to one contact is being made.
- Be aware of and follow the organisation's or club's policy and procedures for delivery of on line coaching sessions or competition. Be aware of good practice and raise any concerns you have about the policy or procedures with the Welfare Officer.

Coaches, leaders and volunteers have a right to:

- Access on-going training and information on all aspects of leading/managing activities for young people, particularly on Safeguarding.
- Support in the reporting of suspected abuse.
- Access to professional support services.
- Fair and equitable treatment by the governing body/club.
- Be protected from abuse by children/young people, other adult members and parents.
- Not to be left vulnerable when working with children.

Emergency action/First aid

- All coaches, leaders and volunteers should be prepared with an action plan in the event of an emergency and be aware of our First Aid Procedures. This will include:
- Access to First Aid equipment
- Telephone contact if the participant is a minor

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- Telephone contact to the Emergency Services

Failure to comply with the codes may result in further action being taken by APT including exclusion from the event or activity.

Dismissals can be appealed by the coach/volunteer with final decisions taken by a subgroup of APT including the Safeguarding lead officer, event organiser and other partners, or be referred to the governing body depending on the disciplinary procedures within the sport.

Signature of coach/leader/volunteer	
Printed name of coach/leader/volunteer	
Date	

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Appendix 17
Active Partners Trust guidance on use of virtual meeting platforms

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Appendix 18

APT Policy - Whistleblowing

Introduction

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing within their organisation. An employee or worker who discloses information about wrongdoing is protected in law from being treated unfairly or losing their job.

A disclosure must be in the public interest. It must affect others e.g. the general public, such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of an individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

Active Partners Trust always aims to conduct its business with the highest standards of integrity and honesty. We expect all employees and workers to uphold these standards in everything they do.

All those who work for us are strongly encouraged to report any perceived wrongdoing by the organisation or its employees, workers, contractors or agents that falls short of these high standards.

This policy is not contractual but sets out the way in which we plan to manage such issues.

Scope of this policy

This policy covers all employees including those on fixed-term contracts and workers (any casual workers, agency workers and interns). It aims to protect those who make a 'protected disclosure' either during their employment (or duration of the contract/agreement in the case of workers,) and also after this has ended, and also enables them to take action in respect of any victimisation.

Note that the scope of this policy does not cover any potential breaches of an employee's employment contract: these should be raised under APT's grievance procedure. Nor is this policy intended to be used to question financial or business decisions taken by APT, nor as a means of reconsidering any matters that have already been addressed under the grievance, disciplinary or other procedures.

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The aim of this policy is to ensure employees feel confident and able to raise any reasonable concern about our activities in the knowledge that it will be taken seriously, and that no action will be taken against them by either Active Partners Trust or their colleagues.

Responsibilities

The CEO has overall responsibility for implementing and monitoring the effectiveness of this policy.

Line managers have a crucial role to play in encouraging employees and workers under their supervision to report any concerns they may have.

Any employee or worker who has knowledge of, or reasonably suspects, any fraud, theft, safeguarding concern (young people and adults at risk) or other suspicious or unlawful act taking place within Active Partners Trust is required to report this to their line manager, or to use the procedure set out below.

All employees and workers, irrespective of their role or seniority must not subject any other employee or worker to any detrimental treatment, nor harass or bully the employee because they have raised a concern under this policy. All employees and workers must not encourage others to do so nor to tolerate such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of such behaviour. In addition, an employee or worker who has victimised a colleague may be personally liable for any such victimisation.

What to report

All of our employees and workers are encouraged to use this procedure if they have a concern about any of the following:

- wrongdoing at work, including any criminal offence
- a failure to comply with legal obligations or breach of any statutory Code of Practice (however, note that any complaint relating to an alleged breach of an employee's individual contract should be raised under our grievance procedure)
- a miscarriage of justice
- a health and safety danger
- an environmental risk or
- a concealment of any of these.

Aims of this policy

This policy aims to assist us in the early detection of any inappropriate behaviour or practices within APT and to provide a clear procedure for our employees and workers to report to us any wrongdoing at work which they believe has occurred or is likely to occur.

APT recognises that individuals may not always feel comfortable about discussing their concerns internally, especially if they believe that the organisation itself is responsible for the wrongdoing.

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All employees and workers, irrespective of their role or seniority must not subject any other employee or worker to any detrimental treatment, nor harass or bully the employee because they have raised a concern under this policy. All employees and workers must not encourage others to do so nor to tolerate such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of such behaviour. In addition, an employee or worker who has victimised a colleague may be personally liable for any such victimisation.

What to report

All of our employees and workers are encouraged to use this procedure if they have a concern about any of the following:

- wrongdoing at work, including any criminal offence and or safeguarding concern
- a failure to comply with legal obligations or breach of any statutory Code of Practice (however, note that any complaint relating to an alleged breach of an employee's individual contract should be raised under our grievance procedure)
- a miscarriage of justice
- a health and safety danger
- an environmental risk or
- a concealment of any of these.

This list is not exhaustive but indicates the types of concerns that should be raised:

- misuse of assets (including stores, equipment, vehicles, buildings, computer hardware and software)

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- failure to comply with appropriate professional standards including the safeguarding code of conduct for employees and volunteers
- bribery, corruption or fraud including the receiving or giving of gifts or hospitality in breach of our procedures
- falsifying records
- failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income to the organisation or would otherwise seriously prejudice the organisation
- abuse of authority
- using the power and authority of Active Partners Trust for any unauthorised or ulterior purpose
- causing damage to the environment
- behaviour or actions that make you feel uncomfortable in terms of known standards
- behaviour or actions that are not in keeping with APT's articles of association and policies

The employee or worker does not have to be able to prove the allegations but should have a reasonable and genuine belief that the information being disclosed is true. Some allegations may prove to be unfounded. APT prefers that the issue or concern is raised, rather than run the risk of not detecting a problem early on.

How to report

In the first instance the employee or worker should discuss the matter with their line manager. However, if the line manager is unavailable, or is the cause of the concern, then raise the concern with any member of the senior management team or member of APT Board:

CEO

Strategic Director Derbyshire

Strategic Director Notts

Strategic Director Cross Sector Partnerships

Head of Operations

Chair and/or Senior Independent Director (SID) of ATP Board

The employee should make it clear, in this first approach, if they want confidentially, i.e. no one else to know they raised the concern.

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The line manager or senior manager will listen and record the concern and decide if action or further information is required.

APT will respect (so far as we can legally) the confidentiality of any whistleblowing complaint received but cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the whistle blower.

Following further investigation of the complaint, the individual will be informed of the result and what, if any, action has been taken. Where such investigation involves outside agencies (e.g. the police) this may cause some delay in the investigation.

There may be matters that cannot be dealt with internally and external organisations (such as the police, the Health and Safety Executive or external auditors) will need to become involved. Where this is necessary, APT reserves the right to make such a referral without the employee's or worker's consent.

If the employee raising the concern remains unhappy about the speed or conduct of the investigation, or the way in which the matter has been resolved, they should refer the matter to the CEO or Board member if the investigation involves the CEO.

An employee can report anonymously but APT may not be able to take the concern any further if insufficient information provided. Anonymous complaints and allegations are much less powerful and therefore will be treated with caution.

An employee who does not want to report their concern to an APT manager or Board member could take legal advice (at their expense) or report to an appropriate external organisation.

APT's commitment

APT undertakes that no employee or worker who makes a bona fide report under this procedure will be subjected to any detriment as a result. If any individual feels that they are being subjected to detrimental treatment, bullying or harassment by any person within the organisation (including their colleagues) as a result of the decision to whistle blow, they must inform a senior manager immediately and appropriate action will be taken to protect them from any reprisals.

However, if it becomes clear that the procedure has been invoked for malicious reasons or to pursue a personal grudge, this may be dealt with through our disciplinary procedure.

Ex-employees and workers

Any protected disclosures made by ex-employees or workers after the termination of their employment/ contract will also be dealt with under this procedure. In such cases, APT will normally ask that the employee/worker to sets out the details of their concerns in writing. APT will respond in writing, once appropriate investigations have taken place.

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Third party organisations/persons

Any protected disclosures made by third party organisations/persons e.g. consultants will also be dealt with under this procedure. In such cases, APT will normally ask that the third party sets out the details of their concerns in writing. APT will respond in writing, once appropriate investigations have taken place.

Implementation, monitoring and review of this policy

This policy will take effect from 01/01/20. The CEO has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation and may be changed from time to time.

Any queries or comments about this policy should be addressed to the CEO.

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