



SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

SOG SPORTS COMPLEX LTD
1 Grandy Close



SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

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SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

Foreword

SOG Sports Complex Ltd is committed to ensuring that every individual who enters our facilities is able to participate in sport, recreation and community activities within a safe, welcoming and respectful environment.

The Complex provides facilities for a wide range of users, including Special Olympics athletes, children, young people, adults, adults at risk, schools, sports clubs, dance academies community organisations and members of the public. We recognise that these diverse user groups require robust safeguarding arrangements that place the welfare, dignity and rights of every individual at the centre of everything we do.

Safeguarding is not solely about responding to allegations of abuse. It is about creating an organisational culture in which risks are identified early, concerns are listened to, individuals are treated with respect and appropriate action is taken whenever there is a concern for a person's welfare.

Everyone who works for, volunteers at, hires or uses the facilities of SOG Sports Complex Ltd shares responsibility for safeguarding. Every individual has a duty to act where they believe that a child or an adult at risk may be experiencing abuse, neglect, exploitation or any other form of harm.

SOG Sports Complex Ltd adopts a zero-tolerance approach towards abuse, bullying, discrimination, harassment, neglect or exploitation of any kind. Concerns will always be taken seriously and dealt with promptly, fairly, confidentially and in accordance with this policy and the relevant statutory requirements of Gibraltar.

The Board of Directors is committed to ensuring that adequate resources, training and leadership are provided to maintain effective safeguarding arrangements throughout the organisation.

1. Safeguarding Statement

SOG Sports Complex Ltd believes that every child, young person and adult at risk has the right to enjoy sport, recreation and community participation in an environment where they feel safe, respected, valued and included.

The welfare of the individual shall always be the primary consideration in every decision affecting their participation within the Complex.

We are committed to promoting a culture where safeguarding is recognised as everyone's responsibility and where all individuals are encouraged to speak up if they have concerns about the safety or wellbeing of another person.

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SOG Sports Complex Ltd will take all reasonable and proportionate measures to:

- protect children and adults at risk from abuse, neglect, exploitation, bullying and discrimination;
- promote safe working practices for employees, volunteers, contractors and sports organisations using the Complex;
- ensure safeguarding concerns are reported promptly and managed appropriately;
- work collaboratively with statutory agencies where required;
- provide appropriate safeguarding awareness and training for employees;
- ensure that organisations hiring the Complex understand and discharge their own safeguarding responsibilities;
- maintain appropriate confidentiality whilst recognising that safeguarding concerns may require information to be shared with relevant authorities;
- continually review safeguarding practices to ensure compliance with legislation and recognised good practice.

Safeguarding extends beyond protecting individuals from harm. It includes promoting dignity, equality, inclusion, wellbeing and the right of every person to participate in sport and recreation free from fear of abuse or discrimination.

2. Purpose of the Policy

The purpose of this policy is to establish a clear framework for safeguarding children and adults at risk who participate in activities or access services at SOG Sports Complex Ltd.

This policy aims to:

- establish a safe environment for all users of the Complex;
- define safeguarding responsibilities for employees, volunteers, clubs, coaches, contractors and hirers;
- provide clear procedures for recognising, responding to and reporting safeguarding concerns;
- promote a culture of openness, accountability and early intervention;
- support organisations hiring the Complex in understanding their safeguarding obligations whilst using the facilities;
- ensure safeguarding concerns are managed consistently, fairly and confidentially;
- support compliance with relevant Gibraltar legislation and recognised safeguarding principles;
- demonstrate SOG Sports Complex Ltd commitment to providing inclusive and accessible sporting opportunities for all members of the community.

The policy seeks not only to respond effectively when concerns arise but also to minimise risk through prevention, education, good governance and continuous improvement.

3. Scope

3.1 Application of this Policy

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This policy applies to all safeguarding activities undertaken by SOG Sports Complex Ltd and extends to every individual who works, volunteers, participates in activities or accesses the facilities of the Complex.

The policy applies irrespective of age, gender, disability, ethnicity, religion, nationality, sexual orientation or any other protected characteristic.

It applies to safeguarding children, young people and adults at risk participating in sporting, recreational, educational or community activities conducted within or from the premises of SOG Sports Complex Ltd.

3.2 Persons Covered

This policy applies to, but is not limited to:

- Members of the Board of Directors.
- The General Manager.
- Employees.
- Volunteers.
- Temporary and agency staff.
- Contractors and consultants.
- Sports clubs and associations using the Complex.
- Coaches, assistant coaches and instructors.
- Referees and technical officials.
- Parents, guardians and carers.
- Athletes and participants.
- Schools and educational establishments.
- Community organisations.
- Members of the public attending activities or events.
- Visitors attending the Complex.

Whilst this policy applies to all persons entering the Complex, the obligations imposed upon individuals are proportionate to their role.

Employees, volunteers, coaches and organisations have specific safeguarding duties.

Members of the public, café customers, gym users, board room users and casual visitors are expected to behave appropriately, comply with safeguarding notices displayed within the Complex and report any safeguarding concerns they observe whilst on the premises.

Members of the public are not expected to undertake safeguarding responsibilities beyond reporting concerns and complying with instructions issued by Complex staff.

3.3 Activities Covered

This policy applies during:

- Sporting activities.
- Training sessions.

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- Competitions.
- Community programmes.
- Educational activities.
- Meetings.
- Events.
- Open days.
- Holiday programmes.
- Recreational sessions.
- Facility hire.
- Volunteer activities.
- Any activity organised, managed or authorised by SOG Sports Complex Ltd.

Where activities are organised by external organisations using the Complex, those organisations retain responsibility for safeguarding within their own programmes; however, SOG Sports Complex Ltd reserves the right to intervene where safeguarding concerns arise or where this policy is not being complied with.

3.4 Duty of Care

SOG Sports Complex Ltd recognises that safeguarding is a shared responsibility.

Whilst organisations hiring the Complex remain responsible for safeguarding their own members, coaches and volunteers, SOG Sports Complex Ltd has a duty to provide facilities that promote the safety and wellbeing of all users and to act appropriately whenever safeguarding concerns arise.

3.5 Relationship with Partner Organisations

SOG Sports Complex Ltd provides facilities to a wide range of organisations, including Special Olympics Gibraltar, schools, sports clubs, governing bodies and community organisations.

Each organisation remains responsible for safeguarding its own members, participants, athletes, coaches, volunteers and officials in accordance with its own safeguarding policies and procedures.

Where activities are delivered by Special Olympics Gibraltar, the Special Olympics Gibraltar Safeguarding Policy and associated safeguarding procedures shall apply to the management of its athletes, coaches and volunteers.

This policy complements, but does not replace, the safeguarding responsibilities of organisations using the Complex.

SOG Sports Complex Ltd reserves the right to intervene where an immediate safeguarding concern arises or where this policy or the Conditions of Hire are not being complied with.

4. Definitions

For the purposes of this policy, the following definitions apply.

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Abuse

Abuse is any action or omission that causes actual or potential harm to another person. Abuse may occur through a single act or repeated acts and may be intentional or unintentional.

Abuse can occur in any environment and may be perpetrated by adults, young people or children.

Child

A child is any person under the age of eighteen years.

Young Person

A young person refers to an individual approaching adulthood, but who has not yet reached the age of eighteen years.

Adult at Risk

An adult at risk is any person aged eighteen years or over who:

- has care and support needs;
- may be unable to protect themselves from abuse or neglect; or
- may be at greater risk because of physical disability, learning disability, mental illness, age, illness or other circumstances.

This includes many Special Olympics athletes and other vulnerable members of the community who use the Complex.

Safeguarding

Safeguarding means protecting children and adults at risk from abuse, neglect, exploitation and harm whilst promoting their welfare, dignity, wellbeing and right to participate safely.

Safeguarding includes prevention, early intervention, reporting concerns, supporting individuals and learning from incidents.

Welfare

Welfare refers to the physical, emotional, psychological and social wellbeing of an individual.

The welfare of children and adults at risk shall always be the primary consideration in safeguarding decisions.

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is the person appointed by SOG Sports Complex Ltd to oversee safeguarding arrangements, receive safeguarding concerns and coordinate appropriate action.

Unless otherwise appointed by the Board, the General Manager shall fulfil this role.

Hirer

A hirer is any club, association, school, organisation, business or individual who has entered into an agreement with SOG Sports Complex Ltd to use its facilities.

Coach

A coach includes any individual responsible for instructing, supervising or leading sporting activities, whether paid or voluntary.

For the purposes of this policy, the term also includes assistant coaches, instructors and activity leaders.

5. Legal and Regulatory Framework

SOG Sports Complex Ltd is committed to operating in accordance with the laws of Gibraltar together with recognised safeguarding principles and accepted standards of good governance.

This policy has been developed with reference to relevant legislation, statutory guidance and recognised safeguarding practice applicable within Gibraltar.

The policy supports the organisation's general duty of care to protect children, young people and adults at risk from abuse, neglect and exploitation whilst participating in activities at the Complex.

Relevant legislation and guidance include, but are not limited to:

- The Children's Act 2009.
- Guidance issued by the Executive Child Protection Committee.
- Applicable safeguarding procedures issued by His Majesty's Government of Gibraltar.
- Relevant criminal legislation concerning offences against children and vulnerable adults.
- Equality legislation applicable within Gibraltar.
- Health and Safety legislation.
- Data Protection legislation.

Nothing within this policy replaces any statutory safeguarding duty imposed by Gibraltar law.

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SOG Sports Complex Ltd also recognises internationally accepted safeguarding principles promoted by recognised sporting organisations and disability sport organisations and will seek to incorporate good practice where appropriate.

Nothing within this policy removes or replaces the statutory responsibilities of the Royal Gibraltar Police, the Care Agency or any other competent authority.

Where there is reason to believe that a child or adult at risk may be suffering or is likely to suffer significant harm, appropriate referrals shall be made without delay.

The organisation recognises that safeguarding responsibilities extend beyond legal compliance and include promoting a culture of dignity, inclusion, respect and accountability.

6. Safeguarding Principles

Safeguarding is fundamental to the values of SOG Sports Complex Ltd and underpins every activity undertaken within the Complex.

The following principles guide every safeguarding decision made by the organisation.

Welfare First

The welfare and best interests of the child or adult at risk shall always be the paramount consideration.

Every safeguarding decision shall place the wellbeing of the individual above organisational or personal interests.

Respect and Dignity

Every individual has the right to be treated fairly, respectfully and with dignity regardless of age, disability, gender, race, religion, nationality, sexual orientation or personal circumstances.

Discrimination, harassment and bullying will not be tolerated.

Inclusion

SOG Sports Complex Ltd promotes equal opportunities for participation in sport and recreation.

Safeguarding arrangements shall be inclusive and accessible to all members of the community, including individuals with intellectual disabilities, physical disabilities and additional support needs.

Prevention

The most effective safeguarding is preventative.

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The organisation is committed to reducing risk through:

- robust recruitment practices;
- appropriate safeguarding training;
- safe working procedures;
- supervision;
- clear codes of conduct;
- effective communication;
- regular review of safeguarding arrangements.

Shared Responsibility

Safeguarding is everyone's responsibility.

Every employee, volunteer, contractor, coach, club official, parent and visitor has a duty to report concerns regarding the welfare of another person.

Remaining silent is not an acceptable response where safeguarding concerns exist.

Early Intervention

Concerns should be reported at the earliest opportunity.

Early intervention often prevents situations from escalating and enables appropriate support to be provided.

No individual will be criticised for raising a genuine safeguarding concern in good faith.

Confidentiality

Safeguarding information will be handled sensitively and confidentially.

Information will only be shared with those who need it in order to protect an individual or fulfil legal obligations.

Accountability

SOG Sports Complex Ltd will ensure safeguarding concerns are managed fairly, objectively and promptly.

Where concerns are substantiated, appropriate action will be taken to protect individuals and reduce future risk.

The organisation is committed to learning from safeguarding incidents and continually improving its safeguarding arrangements.

7. Roles and Responsibilities

7.1 General Principle

Safeguarding is the responsibility of every individual who works, volunteers, participates in activities or accesses the facilities of SOG Sports Complex Ltd.

Whilst specific safeguarding duties may differ according to role, every person has an obligation to contribute towards creating a safe environment and to report any concern relating to the welfare of a child or an adult at risk.

No person should assume that someone else will report a safeguarding concern.

7.2 Board of Directors

The Board of Directors has overall responsibility for ensuring that SOG Sports Complex Ltd fulfils its safeguarding obligations.

The Board shall:

- Promote a culture in which safeguarding is recognised as a fundamental organisational responsibility.
- Approve and periodically review this policy.
- Ensure appropriate governance arrangements are in place.
- Appoint a Designated Safeguarding Lead.
- Ensure adequate resources are available to implement safeguarding measures.
- Monitor safeguarding performance and compliance.
- Receive reports on safeguarding matters where appropriate.
- Ensure lessons learned from safeguarding incidents are incorporated into future practice.

The Board shall ensure safeguarding remains a standing governance consideration when making strategic decisions affecting the operation of the Complex.

7.3 General Manager

The General Manager is responsible for the operational implementation of this policy and, unless otherwise appointed by the Board, shall also act as the Designated Safeguarding Lead (DSL).

The General Manager shall:

- Promote a positive safeguarding culture throughout the organisation.
- Ensure safeguarding procedures are implemented consistently.
- Maintain effective safeguarding records.
- Ensure safeguarding concerns are managed appropriately.
- Liaise with statutory agencies where required.
- Ensure employees receive appropriate safeguarding training.

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- Monitor safeguarding compliance by organisations hiring the Complex.
- Review safeguarding risks associated with activities undertaken at the Complex.
- Report significant safeguarding matters to the Board of Directors.

The General Manager may delegate operational safeguarding duties but shall retain overall accountability unless the Board formally appoints another Designated Safeguarding Lead.

8. Designated Safeguarding Lead (DSL)

8.1 Appointment

SOG Sports Complex Ltd shall appoint a Designated Safeguarding Lead responsible for coordinating safeguarding arrangements throughout the organisation.

Where practicable, a Deputy Designated Safeguarding Lead shall also be appointed to ensure continuity during periods of absence.

8.2 Responsibilities of the DSL

The Designated Safeguarding Lead shall:

- Act as the primary point of contact for safeguarding concerns.
- Receive safeguarding reports from employees, volunteers and facility users.
- Assess concerns and determine appropriate action.
- Maintain confidential safeguarding records.
- Ensure safeguarding referrals are made promptly where required.
- Liaise with relevant statutory authorities.
- Support individuals making safeguarding disclosures.
- Provide safeguarding advice to staff.
- Promote safeguarding awareness throughout the Complex.
- Coordinate safeguarding training.
- Monitor safeguarding compliance.
- Review safeguarding procedures annually.
- Ensure safeguarding documentation is securely retained.

The DSL is not responsible for investigating criminal offences but shall ensure appropriate referrals are made without delay where criminal conduct or significant harm is suspected.

9. Responsibilities of Supervisors

Complex Supervisors play a vital role in maintaining a safe environment during the day-to-day operation of the facility.

Supervisors shall:

- Promote safe working practices.
- Challenge unsafe behaviour.
- Monitor activities taking place within the Complex.

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- Respond appropriately to safeguarding concerns.
- Ensure incidents are recorded.
- Report safeguarding concerns immediately to the DSL.
- Cooperate fully with safeguarding investigations.
- Assist visiting organisations where safeguarding concerns arise.

Supervisors shall not attempt to investigate safeguarding allegations themselves unless authorised to do so.

10. Responsibilities of Employees

Every employee has a duty to safeguard the welfare of children and adults at risk.

Employees shall:

- Treat every individual with dignity and respect.
- Maintain appropriate professional boundaries.
- Challenge inappropriate behaviour.
- Report safeguarding concerns immediately.
- Cooperate with safeguarding investigations.
- Complete safeguarding training required by the organisation.
- Follow all safeguarding procedures.
- Maintain confidentiality.
- Lead by example.

Failure to report a safeguarding concern may itself constitute a disciplinary matter.

11. Responsibilities of Volunteers

Volunteers are expected to maintain the same safeguarding standards as employees.

Volunteers shall:

- Follow this policy.
- Complete any safeguarding training required.
- Report safeguarding concerns.
- Respect confidentiality.
- Maintain professional behaviour.
- Promote an inclusive environment.

Volunteers shall not undertake duties beyond their competence.

12. Responsibilities of Clubs, Associations and Organisations Hiring the Complex

SOG Sports Complex Ltd provides facilities for numerous sports clubs, schools and community organisations.

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Whilst these organisations remain responsible for safeguarding within their own activities, SOG Sports Complex Ltd requires all organisations using the Complex to demonstrate appropriate safeguarding arrangements.

Every organisation hiring the Complex shall maintain an appropriate safeguarding policy relevant to its activities.

Organisations affiliated to national or international governing bodies shall operate in accordance with those safeguarding requirements.

Where activities are organised by Special Olympics Gibraltar, the current Special Olympics Gibraltar Safeguarding Policy shall apply in conjunction with this policy.

Compliance with an organisation's own safeguarding policy does not remove the obligation to comply with the Conditions of Hire and safeguarding requirements of SOG Sports Complex Ltd.

Failure to comply with these requirements may result in the suspension or termination of facility hire arrangements.

Where a club or organisation is aware that an individual is subject to any legal, regulatory or safeguarding restriction that affects their suitability to work with children or adults at risk, then when using the SOG Sports Complex:

- the club or organisation **must NOT** appoint or permit that individual to act as a coach, volunteer, official or in any role that would breach those restrictions; and
- the club or organisation remains solely responsible for ensuring that the individual does **NOT** undertake any activity or role that places children or adults at risk in their care or supervision.

13. Responsibilities of Coaches and Unified Partners

Every coach, instructor or unified partner working within the Complex has a duty to safeguard participants.

They shall:

- Act as positive role models.
- Place participant welfare before sporting performance.
- Maintain professional boundaries.
- Never abuse positions of trust.
- Follow recognised coaching good practice.
- Avoid situations where they are alone with a child or adult at risk unless unavoidable and appropriately managed.
- Report safeguarding concerns immediately.
- Respect confidentiality.
- Promote equality and inclusion.
- Comply with the safeguarding requirements of both their own organisation and SOG Sports Complex Ltd.

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Where requested, coaches shall provide evidence through their club or employing organisation that they have:

- undergone appropriate vetting;
- completed recognised safeguarding training; and
- been authorised by their organisation to undertake coaching duties.

14. Responsibilities of Parents, Guardians and Carers

Parents and carers play an essential role in safeguarding.

They are expected to:

- Encourage respectful behaviour.
- Inform coaches of relevant medical or welfare issues.
- Report safeguarding concerns.
- Support safeguarding procedures.
- Treat volunteers and staff respectfully.
- Supervise children outside organised activities unless alternative arrangements exist.

15. Responsibilities of Participants

Every participant has the right to enjoy sport in a safe environment.

Participants are expected to:

- Treat others with respect.
- Follow reasonable instructions.
- Report behaviour that makes them feel unsafe.
- Respect the rights of others.
- Avoid bullying, harassment or discrimination.
- Support an inclusive sporting environment.

16. Responsibilities of Contractors and Visitors

Whilst this policy applies to all persons entering the Complex, the obligations imposed upon individuals are proportionate to their role.

Contractors, consultants and visitors entering the Complex are expected to conduct themselves appropriately and comply with safeguarding requirements and safeguarding notices whilst on the premises. They are not expected to undertake safeguarding responsibilities beyond reporting concerns and comply with instructions issued by Complex staff.

Where contractors are likely to have regular or unsupervised access to children or adults at risk, SOG Sports Complex Ltd may require evidence that appropriate safeguarding checks have been completed before access is granted.

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Contractors shall:

- Wear identification where appropriate.
- Remain within authorised work areas.
- Avoid unnecessary contact with children or adults at risk.
- Immediately report safeguarding concerns observed whilst on site.

Responsibility Matrix

Role	Key Responsibilities
Board of Directors	Governance, oversight, policy approval and monitoring
General Manager	Operational implementation and accountability
Designated Safeguarding Lead	Coordination, reporting and liaison with statutory agencies
Supervisors	Daily safeguarding oversight and reporting
Operatives	Safeguarding awareness, reporting and professional conduct
Volunteers	Safeguarding awareness and reporting
Clubs & Hirers	Vetting, safeguarding arrangements and supervision of their members
Coaches	Participant welfare and safe coaching practices
Parents/Carers	Support safeguarding and report concerns
Participants	Respect others and report concerns
Contractors	Comply with safeguarding requirements whilst on site

17. Safer Recruitment and Suitability of Personnel

17.1 Policy Statement

SOG Sports Complex Ltd is committed to ensuring that all persons working or volunteering on behalf of the organisation are suitable to work within an environment where children and adults at risk may be present.

The organisation recognises that safer recruitment is one of the most effective methods of preventing unsuitable individuals from gaining positions of trust.

The principles contained within this section apply to the recruitment, appointment and ongoing suitability of employees and volunteers engaged directly by SOG Sports Complex Ltd.

Where coaches, volunteers or officials are provided by external clubs or organisations, responsibility for safer recruitment remains with that organisation. However, SOG Sports Complex Ltd reserves the right to require evidence that appropriate safeguarding arrangements are in place before access to the Complex is granted.

Any employee or volunteer who becomes subject to criminal investigation, safeguarding investigation, bail conditions or court orders which may affect their suitability to work with children or adults at risk must immediately inform the General Manager.

17.2 Recruitment Principles

Recruitment processes shall be conducted fairly, consistently and transparently.

Appointments shall be based upon:

- suitability for the role;
- relevant qualifications;
- experience;
- references where appropriate;
- integrity;
- safeguarding awareness; and
- commitment to the values of SOG Sports Complex Ltd.

Safeguarding considerations shall form part of every recruitment decision where the role involves contact with children or adults at risk.

17.3 Employees

Prior to appointment, SOG Sports Complex Ltd may require prospective employees to provide:

- proof of identity;
- proof of right to work where applicable;
- evidence of qualifications where relevant;
- employment history;
- satisfactory references;
- any other documentation considered necessary for the role.

Where legislation or organisational policy requires, appropriate vetting checks shall be undertaken before employment commences.

Employees shall also complete the safeguarding induction required by the organisation.

17.4 Volunteers

Volunteers undertake an important role within SOG Sports Complex Ltd and are expected to meet the same safeguarding standards as employees.

Volunteers may be required to provide:

- proof of identity;
- references where appropriate;
- evidence of relevant experience;
- safeguarding training certificates where applicable; and
- any vetting documentation required for the role.

No volunteer shall undertake duties beyond their competence or without appropriate supervision.

18. External Clubs, Associations, Academies and Organisations

SOG Sports Complex Ltd provides facilities for a wide range of sporting organisations, educational establishments and community groups.

These organisations remain wholly responsible for the recruitment, appointment, supervision and safeguarding of their own employees, coaches, volunteers and officials.

Nothing within this policy transfers those responsibilities to SOG Sports Complex Ltd.

However, as part of its own duty of care, SOG Sports Complex Ltd requires organisations using its facilities to demonstrate that appropriate safeguarding arrangements are in place.

18.1 Club Responsibilities

Each organisation hiring the Complex shall ensure that:

- safeguarding forms part of its governance arrangements;
- coaches and volunteers are recruited appropriately;
- appropriate vetting has been completed where required;
- safeguarding training has been undertaken;
- safeguarding concerns are reported appropriately;
- participants are adequately supervised throughout activities.

18.2 Written Confirmation

SOG Sports Complex Ltd may require any organisation using its facilities to provide written confirmation that:

- all coaches and volunteers have been appropriately vetted by the organisation;
- recognised safeguarding training has been completed;
- coaches are authorised to undertake activities on behalf of the organisation;
- the organisation maintains appropriate safeguarding procedures.

Such confirmation may be requested annually or whenever considered necessary.

18.3 Safeguarding Lead

Where appropriate, organisations hiring the Complex should nominate a Safeguarding or Welfare Officer.

The nominated individual shall act as the primary safeguarding contact for that organisation and shall liaise with SOG Sports Complex Ltd where safeguarding concerns arise.

18.4 Failure to Demonstrate Compliance

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Where an organisation cannot demonstrate appropriate safeguarding arrangements, SOG Sports Complex Ltd reserves the right to:

- request additional information;
- suspend activities;
- refuse access to facilities;
- terminate a hiring agreement.

Such action shall always be proportionate to the safeguarding risk identified.

19. Suitability of Coaches and Activity Leaders

The safety and wellbeing of participants depends significantly upon the suitability and conduct of coaches and activity leaders.

Accordingly, SOG Sports Complex Ltd requires every organisation using the Complex to ensure that coaches meet appropriate safeguarding standards.

19.1 Minimum Expectations

Every coach or activity leader working with children or adults at risk should:

- be appointed by the organisation they represent;
- be appropriately vetted through that organisation;
- have completed recognised safeguarding training;
- comply with the safeguarding policy of their organisation;
- comply with this policy whilst using the Complex.

19.2 Recognised Safeguarding Training

Recognised safeguarding training may include training delivered by:

- The Care Agency
- The Gibraltar Sports Leisure Authority (GSLA)

Recognised sporting governing bodies;

- UEFA;
- FIFA;
- Accredited safeguarding providers;
- recognised child protection organisations.

Equivalent safeguarding qualifications may also be accepted where considered appropriate.

19.3 Professional Conduct

Coaches shall:

- place participant welfare above sporting success;
- behave professionally at all times;
- avoid situations that could place themselves or participants at risk;
- maintain appropriate boundaries;
- never engage in behaviour that could reasonably be interpreted as grooming or abuse;
- immediately report safeguarding concerns.

20. Induction and Ongoing Safeguarding Awareness

Every employee and volunteer appointed by SOG Sports Complex Ltd shall receive an induction appropriate to their role.

The induction shall include:

- safeguarding responsibilities;
- reporting procedures;
- professional boundaries;
- confidentiality;
- emergency procedures;
- equality and inclusion;
- health and safety;
- codes of conduct.

Safeguarding awareness shall not be regarded as a one-off exercise.

Employees shall receive refresher training whenever necessary to ensure knowledge remains current and effective.

The organisation will encourage continuous professional development and the sharing of good safeguarding practice.

21. Maintaining Suitability

Safeguarding responsibilities continue throughout an individual's engagement with SOG Sports Complex Ltd.

Employees, volunteers and organisations using the Complex are expected to notify the General Manager or Designated Safeguarding Lead if circumstances arise that may affect their suitability to work with children or adults at risk.

Examples include:

- criminal investigations;
- safeguarding investigations;
- disciplinary findings relating to safeguarding;

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- withdrawal of professional registration where relevant;
- any other matter that may reasonably affect safeguarding.

Failure to disclose relevant information may result in disciplinary action or termination of access to the Complex.

22. Codes of Conduct and Professional Boundaries

22.1 Policy Statement

SOG Sports Complex Ltd is committed to creating and maintaining an environment in which every individual is treated with dignity, respect and fairness.

All persons using the Complex have the right to participate in sport and recreational activities free from abuse, intimidation, discrimination, harassment, bullying or exploitation.

The standards set out in this section establish the minimum behavioural expectations for everyone who works at, volunteers in or uses the facilities of SOG Sports Complex Ltd.

Failure to comply with these standards may result in disciplinary action, removal from activities, suspension of facility hire or referral to the appropriate statutory authorities where necessary.

22.2 General Standards of Behaviour

Every person using the Complex shall:

- Treat others with courtesy, dignity and respect.
- Promote an inclusive and welcoming environment.
- Respect diversity and individual differences.
- Behave honestly and with integrity.
- Act professionally at all times.
- Promote the safety and wellbeing of others.
- Report safeguarding concerns immediately.
- Respect confidentiality.
- Comply with all policies of SOG Sports Complex Ltd.
- Follow reasonable instructions issued by employees of the Complex.

Everyone shares responsibility for maintaining a safe sporting environment.

22.3 Employees

Employees are expected to maintain the highest standards of professional conduct.

Employees shall:

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- Always act in the best interests of children and adults at risk.
- Maintain professional boundaries.
- Avoid favouritism.
- Use appropriate language.
- Dress appropriately.
- Behave respectfully.
- Challenge inappropriate behaviour.
- Never abuse their position of trust.
- Never ignore safeguarding concerns.
- Cooperate fully with safeguarding investigations.

Employees shall recognise that their behaviour both inside and outside the workplace may affect the reputation of SOG Sports Complex Ltd.

22.4 Volunteers

Volunteers are ambassadors of SOG Sports Complex Ltd.

Volunteers shall:

- Demonstrate professionalism.
- Respect confidentiality.
- Behave appropriately.
- Promote safeguarding.
- Never place themselves in situations that could be misunderstood.
- Seek advice whenever uncertain.

22.5 Coaches and Activity Leaders

Coaches have significant influence over participants and must exercise this responsibility appropriately.

Coaches shall:

- Promote enjoyment of sport.
- Encourage participation.
- Treat every participant fairly.
- Place welfare before winning.
- Encourage positive behaviour.
- Respect individual abilities.
- Use constructive coaching methods.
- Never humiliate or ridicule participants.
- Never use physical punishment.
- Never threaten participants.
- Never engage in bullying.
- Never discriminate.
- Never exploit their position.

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Professional coaching should inspire confidence rather than fear.

22.6 Parents and Carers

Parents and carers play a vital role in creating a positive sporting environment.

They are expected to:

- Encourage participation.
- Promote good sportsmanship.
- Respect officials.
- Support coaches.
- Behave appropriately towards staff.
- Never verbally abuse participants.
- Never intimidate officials.
- Raise concerns respectfully through appropriate channels.
- Support safeguarding procedures.

Parents should remember that children learn from adult behaviour.

22.7 Participants

Participants have responsibilities towards one another.

Participants shall:

- Respect teammates.
- Respect opponents.
- Respect officials.
- Respect volunteers.
- Respect staff.
- Avoid bullying.
- Avoid discriminatory language.
- Report concerns.
- Follow safety instructions.
- Help create an inclusive sporting environment.

22.8 Spectators

Spectators contribute significantly to the atmosphere within the Complex.

All spectators are expected to:

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- Behave respectfully.
- Encourage participants positively.
- Respect officials' decisions.
- Avoid abusive language.
- Avoid intimidating behaviour.
- Respect safeguarding arrangements.
- Follow instructions issued by Complex staff.

Abusive or threatening behaviour may result in removal from the premises.

23. Professional Boundaries

23.1 General Principle

Maintaining professional boundaries protects both participants and those working with them.

Professional relationships should always remain appropriate, transparent and focused upon the welfare of participants.

Staff, volunteers and coaches should avoid any conduct that could reasonably be misunderstood or interpreted as inappropriate.

23.2 Positions of Trust

Individuals working with children or adults at risk occupy positions of trust.

They shall never use that position to:

- Gain personal advantage.
- Form inappropriate relationships.
- Manipulate participants.
- Isolate participants.
- Groom participants.
- Exploit participants emotionally, financially or sexually.

Any abuse of a position of trust will be treated as a serious safeguarding matter.

23.3 One-to-One Situations

One-to-one situations should be avoided wherever reasonably practicable.

Where they cannot be avoided:

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- Another responsible adult should be informed.
- The meeting should occur in an open or observable environment.
- Doors should remain open where appropriate.
- Transparency should always be maintained.
- The duration should be limited to what is necessary.

Private meetings should never create unnecessary safeguarding risks.

23.4 Physical Contact

Sport occasionally requires appropriate physical contact.

Such contact should always:

- Be appropriate.
- Be necessary.
- Be proportionate.
- Be explained beforehand where possible.
- Respect personal dignity.
- Never cause embarrassment.

Physical contact must never be used as punishment, intimidation or for personal gratification.

23.5 Changing Facilities

Changing areas require particular safeguarding consideration.

SOG Sports Complex Ltd expects that:

- Privacy is respected.
- Appropriate supervision is maintained.
- Adults avoid entering children's changing rooms unless absolutely necessary.
- Where entry is required, another responsible adult should, wherever practicable, also be present.
- Photographs and video recording are strictly prohibited within changing areas.

23.6 Transport

SOG Sports Complex Ltd does not normally provide transport to participants.

Where transport is arranged by external organisations, those organisations remain responsible for ensuring appropriate safeguarding arrangements.

Employees should avoid transporting children or adults at risk alone unless:

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- authorised;
- unavoidable; and
- appropriate safeguards are in place.

23.7 Gifts

Employees, volunteers and coaches should avoid giving personal gifts to individual participants.

Small awards forming part of organised activities are acceptable.

Receiving gifts from participants should also be managed appropriately to avoid perceptions of favouritism.

23.8 Favouritism

Employees and coaches shall not show favouritism towards particular participants.

Every participant shall be treated fairly and equally.

23.9 Personal Relationships

Professional relationships must never become inappropriate personal relationships.

Employees, volunteers and coaches shall avoid situations that may compromise professional judgement or create conflicts of interest.

24. Electronic Communications

Electronic communication has become an important part of sport but presents safeguarding risks if not managed appropriately.

Employees, volunteers and coaches shall:

- Communicate professionally.
- Use appropriate language.
- Use official communication channels wherever possible.
- Respect privacy.
- Avoid excessive personal messaging.
- Maintain appropriate boundaries.

Communication should always be transparent and capable of scrutiny.

25. Unacceptable Behaviour

The following behaviour is strictly prohibited:

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- Physical abuse.
- Sexual abuse.
- Emotional abuse.
- Neglect.
- Grooming.
- Bullying.
- Cyberbullying.
- Harassment.
- Discrimination.
- Intimidation.
- Victimisation.
- Humiliation.
- Exploitation.
- Inappropriate touching.
- Possession or distribution of indecent material.
- Retaliation against whistleblowers.
- Failure to report safeguarding concerns.

Any such behaviour may result in immediate removal from the Complex and referral to the appropriate statutory authorities.

26. Promoting a Positive Culture

Safeguarding is strengthened by creating a positive organisational culture.

SOG Sports Complex Ltd is committed to fostering an environment where:

- everyone feels welcome;
- diversity is celebrated;
- concerns can be raised without fear;
- individuals are listened to;
- safeguarding is viewed as everyone's responsibility;
- learning and continuous improvement are encouraged.

The organisation believes that respectful behaviour, effective communication and visible leadership are fundamental to maintaining a safe and inclusive sporting environment.

27. Recognising Abuse, Poor Practice and Safeguarding Concerns

27.1 Policy Statement

SOG Sports Complex Ltd recognises that abuse, neglect and exploitation can occur in any setting and may affect children, young people and adults at risk regardless of their age, gender, disability, ethnicity, religion, sexual orientation, socioeconomic background or sporting ability.

Abuse is not always obvious. In many cases there may be no physical signs, and concerns may arise from changes in behaviour, disclosures, patterns of incidents or observations made over time.

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All employees, volunteers, contractors and organisations using the Complex should remain vigilant and take all safeguarding concerns seriously.

No person is expected to determine whether abuse has occurred. Their responsibility is to recognise concerns, respond appropriately and report them in accordance with this policy.

27.2 What is Abuse?

Abuse is any act or omission that causes, or is likely to cause, harm to another person. It may consist of a single incident or a pattern of behaviour over time.

Abuse can occur:

- Within families.
- Within sporting environments.
- Between peers.
- Online.
- Within organisations.
- By people in positions of trust.
- By strangers.

A person may experience more than one form of abuse simultaneously.

Low-Level Concerns

For example:

- repeatedly shouting at athletes
- inappropriate jokes
- favouritism
- texting late at night

These may not amount to abuse but should still be reported.

27.3 Types of Abuse

The principal categories of abuse include:

Physical Abuse

Physical abuse involves the deliberate use of force that results in, or has the potential to result in, injury or physical harm.

Examples include:

- Hitting.
- Punching.

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- Kicking.
- Shaking.
- Burning.
- Inappropriate restraint.
- Poisoning.
- Assault.

Within sport, physical abuse may also include excessive or inappropriate training methods or physical punishment.

Emotional or Psychological Abuse

Emotional abuse involves behaviour that damages an individual's emotional wellbeing, confidence or sense of self-worth.

Examples include:

- Constant criticism.
- Humiliation.
- Ridicule.
- Threats.
- Intimidation.
- Isolation.
- Controlling behaviour.
- Bullying.
- Deliberately ignoring a participant.
- Unrealistic expectations causing distress.

This is one of the most common forms of abuse encountered in sporting environments.

Sexual Abuse

Sexual abuse occurs where a person is involved in sexual activity without informed consent or where they lack the capacity to consent.

Examples include:

- Sexual touching.
- Sexual assault.
- Indecent exposure.
- Grooming.
- Sexual exploitation.
- Coercion.
- Inappropriate sexual comments.
- Creating or sharing indecent images.

Any sexual relationship between a child and an adult is abusive.

Adults in positions of trust must never exploit their position for sexual purposes.

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Neglect

Neglect involves the persistent failure to meet an individual's basic physical or emotional needs.

Examples include:

- Lack of supervision.
- Failure to obtain medical treatment.
- Inadequate nutrition.
- Inappropriate clothing.
- Failure to provide appropriate support.
- Abandonment.
- Ignoring welfare needs.

Within sport this may include exposing participants to unnecessary risks or failing to provide appropriate supervision.

Financial Abuse

Financial abuse primarily affects adults at risk.

Examples include:

- Theft.
- Fraud.
- Exploitation.
- Misuse of money.
- Pressure regarding financial decisions.
- Misappropriation of benefits or property.

Discriminatory Abuse

Discriminatory abuse occurs where an individual is treated unfairly because of personal characteristics.

Examples include discrimination based upon:

- Disability.
- Race.
- Religion.
- Nationality.
- Gender.
- Sexual orientation.
- Age.
- Language.
- Cultural background.

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SOG Sports Complex Ltd adopts a zero-tolerance approach to discrimination.

Organisational Abuse

Organisational abuse occurs where poor organisational practices result in harm or increased risk.

Examples include:

- Unsafe procedures.
- Inadequate supervision.
- Failure to respond to concerns.
- Poor leadership.
- Inappropriate disciplinary practices.
- Ignoring safeguarding complaints.

27.4 Bullying

Bullying is behaviour that intentionally causes distress or harm.

Bullying may be:

- Physical.
- Verbal.
- Emotional.
- Social.
- Online (Cyberbullying).

Examples include:

- Name-calling.
- Threats.
- Exclusion.
- Mocking disability.
- Persistent teasing.
- Spreading rumours.
- Online harassment.

Bullying should never be dismissed as "part of sport."

27.5 Grooming

Grooming is a process whereby an individual develops trust with the intention of exploiting another person.

Warning signs may include:

- Giving excessive attention.
- Isolating an individual.

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- Providing gifts.
- Secretive communication.
- Testing personal boundaries.
- Creating dependency.
- Encouraging secrecy.

Grooming may occur in person or online.

27.6 Online Abuse

Technology provides many opportunities but also safeguarding risks.

Online abuse may include:

- Cyberbullying.
- Sexual exploitation.
- Grooming.
- Sharing indecent images.
- Harassment.
- Identity misuse.
- Threats.
- Coercion.

Employees and volunteers should remain alert to concerns arising through electronic communication.

27.7 Abuse of Adults at Risk

Adults at risk may experience abuse similar to children but may also experience additional forms including:

- Financial abuse.
- Coercive control.
- Institutional abuse.
- Self-neglect.
- Neglect by carers.
- Domestic abuse.

Employees should recognise that adults at risk may have communication difficulties and may require additional support when making disclosures.

27.8 Indicators of Abuse

Possible indicators include:

Physical Indicators

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- Unexplained injuries.
- Frequent bruising.
- Burns.
- Fractures.
- Injuries inconsistent with explanations.
- Untreated medical conditions.

Behavioural Indicators

- Sudden behavioural changes.
- Withdrawal.
- Anxiety.
- Depression.
- Aggression.
- Fear of particular individuals.
- Self-harm.
- Low confidence.
- Reluctance to attend activities.
- Regression in behaviour.

Indicators of Neglect

- Poor hygiene.
- Hunger.
- Inappropriate clothing.
- Persistent tiredness.
- Lack of medical care.
- Frequent absence.

Indicators in Adults at Risk

- Unexplained financial difficulties.
- Fearfulness.
- Isolation.
- Sudden dependency.
- Poor living conditions.
- Weight loss.
- Lack of medication.
- Changes in behaviour.

27.9 Poor Practice

Poor practice differs from abuse but may increase safeguarding risks if not addressed.

Examples include:

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- Failing to follow procedures.
- Inappropriate language.
- Favouritism.
- Inadequate supervision.
- Poor record keeping.
- Ignoring minor concerns.
- Excessive shouting.
- Poor communication.

Poor practice should be challenged promptly to prevent escalation.

27.10 Distinguishing Poor Practice from Abuse

Poor Practice	Abuse
Usually unintentional	Intentional or reckless
May result from poor judgement	Causes or risks significant harm
Can often be corrected through supervision or training	Requires formal safeguarding action and may require referral to statutory authorities
Examples: inadequate supervision, poor communication, inconsistent boundaries	Examples: assault, sexual abuse, grooming, neglect, coercion, exploitation

Repeated poor practice may become a safeguarding concern and should never be ignored.

27.11 Disclosure of Abuse

A disclosure may occur when an individual tells another person that they have experienced or witnessed abuse.

Disclosures may be:

- Direct.
- Indirect.
- Partial.
- Delayed.
- Non-verbal.

Some individuals may disclose through changes in behaviour rather than words.

All disclosures must be treated seriously.

27.12 If Someone Tells You About Abuse

If an individual makes a disclosure:

- Stay calm.

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- Listen carefully.
- Allow them to speak freely.
- Do not interrupt unnecessarily.
- Reassure them that they have done the right thing by speaking.
- Do not promise to keep the information secret.
- Explain that you may need to share the information with those who can help keep them safe.
- Record what has been said as soon as possible, using the individual's own words where practicable.
- Report the matter immediately to the Designated Safeguarding Lead.

Do not:

- Investigate the allegation.
- Ask leading questions.
- Express disbelief.
- Make promises that cannot be kept.
- Confront the alleged perpetrator.

27.13 Immediate Danger

Where a person is believed to be at immediate risk of significant harm, the priority is their safety.

In such circumstances:

1. Take immediate steps to protect the individual.
2. Contact the emergency services if required.
3. Notify the Designated Safeguarding Lead as soon as practicable.
4. Preserve any evidence where appropriate.
5. Complete the Safeguarding Reporting Form as soon as possible after the immediate risk has been addressed.

Protecting life and preventing further harm shall always take precedence over administrative procedures.

28. Responding to Safeguarding Concerns and Reporting Procedures

28.1 Policy Statement

SOG Sports Complex Ltd is committed to ensuring that every safeguarding concern is taken seriously, responded to promptly and managed in a fair, proportionate and lawful manner.

Every person working or volunteering within the Complex has a duty to act if they have reason to believe that a child or an adult at risk may be suffering, or is at risk of suffering, abuse, neglect or exploitation.

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No safeguarding concern should ever be ignored.

Taking no action is not an acceptable response.

Concerns Relating to Incidents Outside the Complex

A safeguarding concern may relate to an incident or circumstances occurring outside the SOG Sports Complex. Where such a concern, disclosure or allegation is reported to, witnessed by, or otherwise comes to the attention of an SOG Sports Complex Ltd employee or the Designated Safeguarding Lead in the course of their duties, it shall be received, recorded and, where appropriate, referred in accordance with this Policy. SOG Sports Complex Ltd will not investigate safeguarding matters on behalf of an external club or organisation but will take reasonable action where necessary to protect the welfare of a child or adult at risk.

28.2 Guiding Principles

When responding to safeguarding concerns, the following principles shall always apply:

- The safety and welfare of the individual is paramount.
- Concerns should be reported without delay.
- Information should be recorded accurately.
- Confidentiality should be maintained.
- Information should only be shared on a need-to-know basis.
- Employees should not investigate allegations themselves.
- Concerns should never be dismissed because there is uncertainty.
- Early reporting allows appropriate agencies to assess risk.

Where there is doubt, the concern should still be reported.

28.3 Recognising a Concern

A safeguarding concern may arise through:

- A direct disclosure.
- An observation.
- Information received from another person.
- A pattern of behaviour.
- An injury.
- A complaint.
- Behaviour witnessed by staff.
- Online activity.
- Concerns raised by another organisation.

Employees should trust their professional judgement.

It is better to report a genuine concern that proves unfounded than to fail to report a concern that later results in harm.

28.4 Immediate Response

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Where a safeguarding concern arises, the person receiving the information should:

Remain Calm

Avoid showing shock or disbelief.

Remain reassuring.

Listen Carefully

Allow the individual to speak freely.

Do not interrupt unnecessarily.

Take the Individual Seriously

Every disclosure or concern should be treated respectfully.

Never dismiss concerns.

Reassure

Explain that they have done the right thing by speaking.

Do not make unrealistic promises.

Do Not Promise Confidentiality

Instead explain:

"I will only share this information with people who need to know in order to help keep you safe."

Clarify Only Where Necessary

Questions should only clarify immediate facts.

Do not interview.

Do not investigate.

Avoid leading questions.

Record Information

As soon as practicable record:

- what was seen;
- what was heard;
- dates;

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- times;
- locations;
- witnesses;
- actions taken.

Use the person's own words wherever possible.

28.5 Immediate Danger

If a person is believed to be in immediate danger:

The employee should:

1. Protect the individual from further harm where it is safe to do so.
2. Contact the emergency services (999) immediately where necessary.
3. Notify the Designated Safeguarding Lead as soon as practicable.
4. Preserve evidence where possible.
5. Complete the Safeguarding Reporting Form.

The preservation of life and prevention of harm shall always take precedence over organisational procedures.

28.6 Reporting Procedure

If a child or adult is in immediate danger, contact the Royal Gibraltar Police immediately before following internal reporting procedures.

All safeguarding concerns shall be reported immediately to the Designated Safeguarding Lead.

Where the Designated Safeguarding Lead is unavailable, concerns shall be reported to:

- the Deputy Designated Safeguarding Lead; or
- the General Manager (if different); or
- another senior manager nominated by the organisation.

Where delay would place someone at risk, the employee should contact the appropriate emergency or statutory authority immediately before notifying management.

28.7 Role of the Designated Safeguarding Lead

Upon receiving a safeguarding concern, the Designated Safeguarding Lead shall:

- acknowledge receipt;
- assess immediate risk;
- determine whether urgent protective action is required;
- ensure the concern is properly recorded;
- consider whether referral to statutory agencies is necessary;
- maintain confidentiality;
- provide support to those involved;

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- keep accurate safeguarding records;
- monitor progress until the matter is concluded.

The DSL is responsible for coordinating the organisational response but is not responsible for determining criminal liability.

28.8 Recording Concerns

Accurate records are essential.

Records should include:

- Date.
- Time.
- Location.
- Names of persons involved.
- Witnesses.
- Exact words used during any disclosure where possible.
- Observations.
- Injuries observed.
- Immediate actions taken.
- Referrals made.
- Person completing the record.
- Date and time completed.

Records should distinguish clearly between:

- Fact.
- Observation.
- Opinion.
- Information received from another person.

Personal opinions should be avoided unless clearly identified as such.

28.9 Confidentiality

Safeguarding information is highly sensitive.

Information shall only be shared:

- where necessary to protect someone;
- where required by law;
- with relevant statutory authorities;
- with those directly involved in managing the concern.

Information shall never be discussed casually.

Employees should not:

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- gossip;
- speculate;
- discuss concerns with colleagues unnecessarily;
- disclose information on social media.

28.10 Referrals to External Authorities

Where appropriate, the Designated Safeguarding Lead shall make referrals to the relevant Gibraltar statutory authority.

Examples include:

- Royal Gibraltar Police.
- Care Agency.
- Other statutory safeguarding agencies.
- Regulatory authorities where appropriate.

Referrals should be made without unnecessary delay whenever there is reasonable concern that significant harm has occurred or may occur.

28.11 Allegations Against DSL, Employees, Volunteers or Coaches

Allegations involving:

- employees;
- volunteers;
- contractors;
- coaches;
- officials;
- club representatives;

shall always be treated seriously.

The organisation shall:

- ensure immediate safety;
- avoid prejudging the allegation;
- maintain confidentiality;
- cooperate fully with statutory investigations;
- consider temporary precautionary measures where appropriate.

Internal disciplinary procedures shall not interfere with criminal investigations.

If the allegation concerns the **Designated Safeguarding Lead**, the concern should be reported directly to the Chair of the Board and where appropriate, the relevant statutory authority.

28.12 Anonymous Reports

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Anonymous safeguarding reports shall not be disregarded solely because the reporter has not identified themselves.

The information provided shall be assessed on its merits.

28.13 False or Malicious Allegations

SOG Sports Complex Ltd recognises that deliberately false or malicious allegations are rare.

However, where evidence demonstrates that an allegation has been intentionally fabricated or made maliciously, appropriate disciplinary or legal action may be considered.

This shall never discourage individuals from reporting genuine concerns made in good faith.

28.14 Support for Individuals Raising Concerns

Employees, volunteers and participants who report safeguarding concerns in good faith shall be supported by SOG Sports Complex Ltd.

No individual shall suffer disadvantage for raising a genuine safeguarding concern.

Retaliation against any person making a safeguarding report is unacceptable and may constitute a disciplinary matter.

28.15 Support for Victims

Where appropriate, SOG Sports Complex Ltd shall provide reasonable support to individuals affected by safeguarding concerns.

Support may include:

- reassurance;
- adjustments to participation;
- liaison with parents or carers where appropriate;
- referral to appropriate support services;
- ongoing welfare monitoring.

The organisation recognises that safeguarding concerns may have lasting emotional effects and that support may be required after investigations have concluded.

28.16 Learning from Safeguarding Incidents

Every safeguarding incident provides an opportunity to improve organisational practice.

Following the conclusion of significant safeguarding matters, the Designated Safeguarding Lead shall consider:

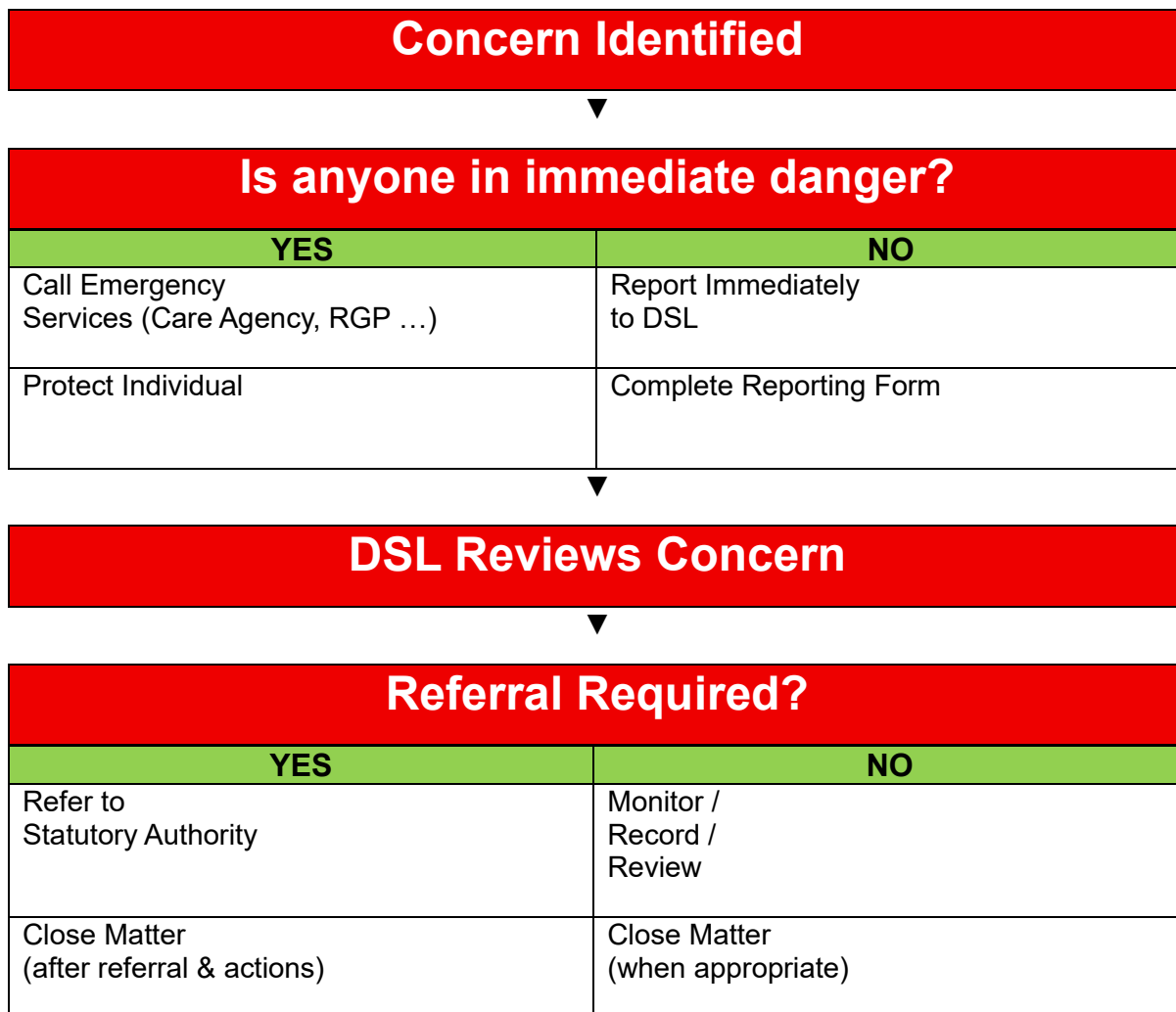
- what happened;

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- whether procedures were followed;
- whether improvements are required;
- whether additional training is necessary;
- whether policies should be updated.

The emphasis shall be on continuous learning and prevention.

28.17 Reporting Flowchart



Review, monitor and close the matter once all necessary actions have been completed and documented.

Note: Where there is an immediate risk of harm, contact the emergency services without delay before notifying the Designated Safeguarding Lead (DSL). All safeguarding concerns must be documented using the appropriate SOGSC safeguarding forms.

29. Confidentiality, Information Sharing and Record Management

29.1 Policy Statement

SOG Sports Complex Ltd recognises that safeguarding information is highly sensitive and must be managed with the utmost care, professionalism and integrity.

The organisation is committed to protecting the privacy and dignity of individuals while recognising that safeguarding concerns may require information to be shared with appropriate persons or statutory authorities in order to protect children or adults at risk.

Information shall always be managed lawfully, proportionately and on a strict "need to know" basis.

Safeguarding concerns should never be withheld because of misunderstandings regarding confidentiality.

29.2 Confidentiality

Everyone involved in safeguarding has a duty to maintain confidentiality.

Information relating to safeguarding concerns shall only be shared:

- where necessary to protect an individual;
- where required by law;
- where disclosure is necessary to prevent harm;
- with statutory authorities;
- with persons directly responsible for safeguarding.

Employees shall not:

- discuss safeguarding matters in public areas;
- disclose information to colleagues who do not require it;
- speculate regarding allegations;
- discuss safeguarding matters with family or friends;
- publish safeguarding information on social media.

The identity of individuals involved should be protected wherever possible.

29.3 Information Sharing

Information sharing is an essential part of safeguarding.

Information may be shared when it is necessary to:

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- protect a child;
- protect an adult at risk;
- prevent crime;
- comply with legal obligations;
- support safeguarding investigations.

Where possible, individuals should be informed that information will be shared.

However, consent is not required where obtaining consent may place an individual at greater risk or prejudice an investigation.

The safety of the individual shall always take precedence.

29.4 Accuracy of Records

Safeguarding records must be:

- factual;
- accurate;
- objective;
- timely;
- complete.

Records should distinguish clearly between:

- observed facts;
- direct disclosures;
- professional opinion;
- information received from another person.

Opinions should be clearly identified as such.

Employees should avoid assumptions or speculation.

29.5 Storage of Safeguarding Records

Safeguarding records shall be retained securely.

Access shall be restricted to authorised persons only.

Electronic records shall be password protected.

Paper records shall be stored in secure locked facilities.

Records shall not be removed from the Complex without authorisation.

29.6 Retention of Records

Safeguarding records shall be retained in accordance with:

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- Gibraltar legislation;
- data protection requirements;
- organisational record retention procedures.

Where safeguarding concerns relate to children or adults at risk, records may need to be retained for extended periods.

No safeguarding records shall be destroyed whilst investigations remain ongoing.

29.7 Access to Records

Requests for access to safeguarding records shall be managed carefully.

Access may be granted only where:

- authorised by law;
- necessary for safeguarding purposes;
- approved by the Designated Safeguarding Lead;
- required by statutory authorities.

Confidential third-party information shall not be disclosed inappropriately.

29.8 Learning and Review

Safeguarding records should also be used to identify:

- trends;
- recurring concerns;
- training needs;
- policy improvements;
- operational risks.

The Designated Safeguarding Lead shall periodically review safeguarding records to improve organisational practice.

30. Photography, Video Recording, CCTV and Live Streaming

30.1 Policy Statement

This part should be read together with the SOG Sports Complex Photography, Filming and Digital Images Policy (SOGSC-POL-0026)

SOG Sports Complex Ltd recognises that photography, video recording and live streaming are valuable tools for celebrating achievement, promoting sport, supporting education and engaging the wider community.

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The organisation also recognises that inappropriate use of images may present safeguarding and privacy risks.

Accordingly, photography, video recording and live streaming shall always be managed responsibly and with appropriate safeguards.

30.2 General Principles

Photography and filming shall always:

- respect dignity;
- avoid embarrassment;
- protect privacy;
- promote positive images;
- support safeguarding.

Images should never place participants at unnecessary risk.

30.3 Authorised Photography (SOGSC-POL-0026)

Photography may be undertaken by:

- SOG Sports Complex Ltd;
- participating organisations;
- accredited media;
- parents and spectators (subject to event rules);
- authorised photographers.

The organisation reserves the right to restrict photography where safeguarding concerns exist.

30.4 Consent

Where photographs or recordings are intended for promotional purposes, appropriate consent should be obtained in accordance with applicable legal and organisational requirements.

Special consideration should be given to:

- children;
- adults at risk;
- individuals who do not wish to be photographed.

Reasonable efforts shall be made to respect those wishes.

30.5 Appropriate Images

Photographers should avoid images that:

- exploit or sensationalise participants;

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- unnecessarily focus on vulnerable individuals;
- are taken in inappropriate settings;
- could reasonably be interpreted as intrusive or compromising.

Photographs should:

- portray individuals positively;
- reflect sporting participation;
- avoid unnecessary close-up images;
- avoid inappropriate poses;
- maintain dignity.

Close-up images may be taken where they are appropriate, respectful and relate directly to sporting participation, presentation ceremonies or official promotional activities.

Images should never be manipulated to create misleading or inappropriate representations.

30.6 Inappropriate Photography

Photography is strictly prohibited:

- inside toilets;
- changing rooms;
- shower areas;
- medical treatment rooms;
- any private area designated by the Complex.

Unauthorised photography in these areas may result in removal from the premises and referral to the appropriate authorities.

30.7 Live Streaming

SOG Sports Complex Ltd may broadcast sporting events through live streaming platforms.

Where live streaming is undertaken:

- safeguarding considerations shall be incorporated into event planning;
- camera positions shall avoid capturing private areas;
- commentary shall remain respectful;
- participants shall be treated with dignity;
- personal information shall not be disclosed unnecessarily.

Live streaming should enhance participation rather than compromise safeguarding.

30.8 Use of Personal Devices

Employees should avoid using personal mobile phones or cameras to photograph participants unless specifically authorised for operational purposes.

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Where photographs are required:

- organisational equipment should be used where practicable;
- images should be transferred securely;
- unnecessary images should be deleted appropriately.

30.9 Social Media

Social media provides valuable opportunities for communication but also presents safeguarding risks.

Employees, volunteers and coaches should:

- communicate professionally;
- protect privacy;
- avoid sharing confidential information;
- avoid inappropriate comments;
- maintain professional boundaries.

Images should never be used to ridicule, embarrass or exploit participants.

30.10 Cyber Safety

The organisation encourages responsible online behaviour.

Employees and volunteers should:

- protect passwords;
- report inappropriate online activity;
- avoid engaging in online disputes with participants;
- use official organisational communication channels wherever possible.

30.11 CCTV

SOG Sports Complex Ltd operates Closed-Circuit Television (CCTV) within designated areas of the Complex for the purposes of:

- enhancing the safety and security of visitors, employees and contractors;
- assisting in the prevention and detection of crime;
- supporting the investigation of accidents, incidents and safeguarding concerns;
- protecting the property and assets of SOG Sports Complex Ltd.
- Internally instigated by disciplinary investigations

The operation of CCTV shall comply with applicable data protection legislation and organisational procedures.

Appropriate signage shall be displayed informing visitors that CCTV is in operation.

30.12 Use of CCTV Footage

Access to CCTV recordings shall be restricted to authorised persons.

Footage may be reviewed:

- following accidents;
- following safeguarding concerns;
- following criminal incidents;
- to assist statutory authorities;
- for health and safety investigations.

CCTV shall never be used for inappropriate monitoring of individuals.

30.13 Publication of Images

Before publishing photographs or videos on websites or social media, consideration shall be given to:

- safeguarding;
- privacy;
- dignity;
- proportionality;
- reputational impact.

Where practical, individuals should not be identified by full name in connection with images of children or adults at risk unless there is a legitimate reason and appropriate consent or authority.

30.14 Removal of Images

Where SOG Sports Complex Ltd receives a reasonable request to remove an image due to safeguarding or privacy concerns, the request shall be considered promptly and, where appropriate, the image will be removed without unnecessary delay.

30.15 Responsibility During Events

Organisations hiring the Complex remain responsible for ensuring that photography and filming undertaken during their activities complies with their own safeguarding procedures and with this policy.

SOG Sports Complex Ltd reserves the right to intervene where photography or filming presents a safeguarding concern or breaches the Conditions of Hire.

Excellent. These final policy chapters complete the governance framework and ensure that safeguarding remains an active and continuously improving part of the organisation's operations. Following these sections, we will move on to the appendices and forms.

31. Training, Competency and Awareness

31.1 Policy Statement

SOG Sports Complex Ltd recognises that effective safeguarding depends upon knowledgeable, confident and competent individuals.

Safeguarding is not achieved solely through policies and procedures. It requires ongoing education, awareness and a commitment by everyone to promote a culture where safeguarding is understood, valued and embedded within everyday practice.

The organisation is committed to ensuring that all employees understand their safeguarding responsibilities and receive training appropriate to their role.

31.2 Training Objectives

The objectives of safeguarding training are to ensure that individuals:

- understand their safeguarding responsibilities;
- recognise signs and indicators of abuse, neglect and exploitation;
- know how to respond appropriately to disclosures;
- understand reporting procedures;
- maintain professional boundaries;
- contribute to a positive safeguarding culture.

Safeguarding training shall be proportionate to an individual's role and responsibilities.

31.3 Employees

All employees shall receive safeguarding awareness training as part of their induction.

Training should include:

- safeguarding principles;
- recognising abuse;
- responding to disclosures;
- reporting procedures;
- confidentiality;
- professional boundaries;
- equality and inclusion;
- emergency safeguarding arrangements.

Employees shall receive refresher training periodically or whenever significant changes occur to legislation, guidance or organisational procedures.

31.4 Supervisors and Managers

Employees with supervisory or management responsibilities should receive additional safeguarding training appropriate to their role.

This may include:

- managing safeguarding concerns;
- record keeping;
- supporting staff;
- responding to allegations;
- liaison with statutory authorities;
- safeguarding risk management.

31.5 Designated Safeguarding Lead

The Designated Safeguarding Lead should undertake safeguarding training appropriate to the responsibilities of the role and should maintain current knowledge through continuing professional development.

31.6 Volunteers

Volunteers shall receive safeguarding information appropriate to the activities they undertake.

Where volunteers work directly with children or adults at risk, additional safeguarding awareness may be required.

31.7 Clubs and Organisations

SOG Sports Complex Ltd encourages all clubs and organisations using the Complex to ensure that coaches, volunteers and officials receive recognised safeguarding training appropriate to their role.

As part of the Conditions of Hire, organisations may be required to confirm that such training has been completed by submitting the annual club safeguarding declaration.

31.8 Safeguarding Awareness

Safeguarding awareness shall be promoted through:

- staff meetings;
- induction programmes;
- policy reviews;
- information notices;
- guidance documents;
- periodic refresher sessions.

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Safeguarding should remain a regular topic of discussion rather than only being considered after incidents occur.

32. Allegations Against Employees, Volunteers and Others

32.1 Policy Statement

SOG Sports Complex Ltd is committed to ensuring that all allegations or concerns involving employees, volunteers, contractors, coaches, officials or any other person working at or using the Complex are taken seriously and managed fairly, promptly and confidentially.

The welfare and safety of the child or adult at risk shall always be the primary consideration. At the same time, individuals who are the subject of an allegation have the right to be treated fairly, with respect and without prejudice.

An allegation does not, in itself, indicate that abuse has occurred. All allegations shall be managed objectively and in accordance with this policy and any applicable statutory safeguarding procedures.

32.2 Scope

This section applies where an allegation or safeguarding concern relates to:

- an employee of SOG Sports Complex Ltd;
- a volunteer;
- a member of the Board of Directors;
- a contractor or consultant;
- a coach, official or activity leader;
- a member of an external club or organisation;
- a hirer or visitor; or
- any other adult whose conduct may present a safeguarding risk to a child or adult at risk while using the Complex.

32.3 Immediate Action

Any allegation or safeguarding concern shall be reported immediately to the Designated Safeguarding Lead (DSL).

If the allegation concerns the DSL, the matter shall be reported directly to the Chair of the Board of Directors or, where appropriate, to the relevant statutory authority.

Where there is reason to believe that a child or adult at risk is in immediate danger, the safety of that individual shall take precedence over all other considerations. Emergency services or the Royal Gibraltar Police shall be contacted without delay where appropriate.

32.4 Managing Allegations

Upon receiving an allegation, the Designated Safeguarding Lead shall:

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- ensure that any immediate safeguarding risks are addressed;
- make an accurate written record of the allegation;
- preserve any relevant information or evidence;
- avoid questioning the individual beyond what is necessary to clarify the immediate facts;
- seek advice from the appropriate statutory authority where required; and
- determine whether the matter should be referred to the Royal Gibraltar Police, the Care Agency or another appropriate authority.

The Designated Safeguarding Lead shall not undertake any investigation that could prejudice a police investigation or statutory safeguarding enquiry.

32.5 Suspension and Protective Measures

Where appropriate, SOG Sports Complex Ltd may implement temporary protective measures whilst an allegation is being considered.

Such measures may include:

- temporary removal from duties involving children or adults at risk;
- increased supervision;
- temporary suspension of access to the Complex; or
- other proportionate measures necessary to safeguard individuals.

The implementation of protective measures is a neutral act intended to protect all parties and does not imply guilt or wrongdoing.

32.6 Allegations Involving External Organisations

Where an allegation concerns a coach, volunteer or official employed or appointed by a club, school or other organisation hiring the Complex, that organisation remains responsible for managing its employment or disciplinary processes.

SOG Sports Complex Ltd will cooperate fully with the organisation and any statutory authority and reserves the right to suspend or restrict access to its facilities where necessary to protect children, adults at risk or other users of the Complex.

32.7 Confidentiality

Information relating to allegations shall be treated as strictly confidential and shared only with those who have a legitimate need to know.

Employees, volunteers and other persons must not discuss allegations with colleagues, participants, parents, the media or members of the public unless authorised to do so.

32.8 Recording

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All allegations shall be recorded using the approved **Allegation Against an Adult Report Form** and retained securely in accordance with the organisation's safeguarding and data protection procedures.

Records shall include:

- the nature of the allegation;
- persons involved;
- action taken;
- referrals made;
- decisions reached; and
- the final outcome, where known.

32.9 Learning and Review

Following the conclusion of any safeguarding allegation, the Designated Safeguarding Lead shall review the circumstances of the case to determine whether any lessons can be learned or improvements made to policies, procedures, training or operational practices.

Where appropriate, recommendations shall be reported to the General Manager and Board of Directors for consideration.

33. Monitoring, Audit and Continuous Improvement

33.1 Commitment to Improvement

SOG Sports Complex Ltd is committed to continually improving its safeguarding arrangements.

Safeguarding shall be monitored to ensure that policies remain effective, relevant and reflective of current legislation and good practice.

33.2 Monitoring

The Designated Safeguarding Lead shall monitor:

- safeguarding incidents;
- complaints;
- training records;
- safeguarding declarations received from hirers;
- policy compliance;
- lessons learned from incidents.

Monitoring should identify both strengths and areas requiring improvement.

33.3 Internal Review

Periodic reviews should consider:

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- whether procedures are being followed;
- whether safeguarding records are complete;
- whether reporting procedures are effective;
- whether additional guidance is required;
- whether staff require further training.

33.4 Safeguarding Report

The Gibraltar Opportunity Charitable Trust Board

The General Manager shall submit a safeguarding report to each ordinary meeting of the Gibraltar Opportunity Charitable Trust Board. ('The Board')

The report should include:

- Number of safeguarding concerns received
- General nature of concerns
- Number referred externally
- Number resolved internally
- Safeguarding training completed
- Outstanding actions
- Policy review matters

33.5 Learning from Experience

SOG Sports Complex Ltd is committed to learning from:

- safeguarding concerns;
- complaints;
- near misses;
- changes in legislation;
- developments in safeguarding practice.

The organisation recognises that continuous improvement is an essential component of effective safeguarding.

34. Missing Child or Adult at Risk

34.1 Policy Statement

SOG Sports Complex Ltd is committed to promoting the safety and wellbeing of every individual using the Complex. The unexpected disappearance of a child or an adult at risk during any activity shall be treated seriously and responded to promptly.

Whilst clubs, schools, associations and organisations hiring the Complex remain responsible for the supervision and safeguarding of their own participants, SOG Sports Complex Ltd will provide reasonable assistance in locating the individual and, where appropriate, support the implementation of safeguarding procedures.

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The safety and welfare of the missing person shall always be the primary consideration.

34.2 Initial Response

If it is suspected that a child or adult at risk is missing, the person receiving the report shall:

- remain calm and obtain the person's name, description and any relevant identifying information;
- establish where and when the person was last seen;
- immediately notify the Complex Supervisor or Designated Safeguarding Lead (DSL);
- inform the responsible club, organisation, coach, parent, guardian or carer where appropriate; and
- commence a proportionate search of the Complex and its immediate surroundings, provided this can be undertaken safely.

34.3 Immediate Risk

Where there is reason to believe that the missing person is at immediate risk of harm, has left the premises, or cannot be located promptly, the Designated Safeguarding Lead or responsible person shall ensure that the Royal Gibraltar Police or other appropriate emergency service is contacted without delay.

Internal reporting procedures must never delay contacting the emergency services where there is an immediate safeguarding risk.

34.4 Role of External Organisations

Where the missing person is participating in an activity organised by a club, school or other external organisation, that organisation retains responsibility for the supervision of its participants and shall work closely with SOG Sports Complex Ltd throughout the incident.

SOG Sports Complex Ltd will cooperate fully with the organisation and any statutory authority involved.

34.5 Recording the Incident

All incidents involving a missing child or adult at risk shall be recorded using the SOG Sports Complex **Missing Child / Adult at Risk Report Form (SOGSC-FOR-0038)** as soon as practicable after the incident.

The record should include:

- the person's details;
- the time they were reported missing;
- where they were last seen;
- action taken;
- persons notified;
- the outcome of the incident; and
- any recommendations to reduce the likelihood of a similar occurrence.

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Records shall be retained securely in accordance with the organisation's safeguarding and data protection procedures.

34.6 Learning and Review

Following any incident involving a missing child or adult at risk, the Designated Safeguarding Lead shall review the circumstances to determine whether any lessons can be learned or improvements made to safeguarding arrangements, supervision, risk assessments or operational procedures.

Where appropriate, recommendations shall be reported to the General Manager and Board of Directors for consideration.

35. Whistleblowing

SOG Sports Complex Ltd is committed to promoting a culture of openness, transparency and accountability in which safeguarding concerns can be raised without fear of intimidation, discrimination or retaliation.

Any employee, volunteer, contractor, hirer, coach, official or other person who has a genuine concern that a child or adult at risk may be at risk of harm, or who believes that safeguarding procedures are not being followed, is encouraged to report their concerns immediately.

Concerns should normally be reported to the Designated Safeguarding Lead (DSL). Where the concern relates to the DSL, or where it is not appropriate to report the matter to the DSL, the concern should be reported directly to the Chair of the Board of Directors or, where appropriate, to the relevant statutory authority.

No individual who raises a safeguarding concern honestly and in good faith will suffer any detriment, victimisation or disadvantage as a result of making that report, even if the concern is not subsequently substantiated.

Deliberately making a false or malicious allegation may constitute misconduct and may result in disciplinary or other appropriate action.

All whistleblowing concerns will be treated seriously, handled as confidentially as circumstances permit, and investigated or referred appropriately in accordance with this policy and any applicable legal requirements.

Where there is an immediate risk of serious harm to a child or adult at risk, the safety of that individual takes precedence over internal reporting procedures. Emergency services and/or the appropriate statutory authority should be contacted without delay before notifying the Designated Safeguarding Lead where necessary.

36. Policy Review

This policy shall be reviewed annually or as soon as practicable following any serious safeguarding incident, changes in legislation, or revisions to Government safeguarding

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guidance, following changes to organisational structure and where improvements are identified through audit or review.

Minor amendments may be authorised by the General Manager where they do not materially alter the intent of the policy. Material amendments shall be submitted to the Board of Directors for approval.

The Designated Safeguarding Lead shall conduct an annual review and present it to the Board of Directors.

The review should include:

- number of safeguarding concerns reported;
- training undertaken;
- policy compliance;
- trends identified;
- recommendations for improvement.

Individual cases shall remain confidential and any information presented to the Board shall be anonymised unless disclosure is necessary for governance purposes.

37. Related Policies and Procedures

This policy should be read in conjunction with the following organisational policies and procedures:

- Health and Safety Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Volunteer Code of Conduct
- Facility Conditions of Hire
- Complaints Procedure
- Disciplinary Procedure
- Grievance Procedure
- Data Protection Policy
- Photography, Video Recording and Social Media Policy
- Incident Reporting Procedure
- Emergency Procedures
- Fire Safety Procedures
- First Aid Procedures
- Risk Assessment Procedures

38. Policy Ownership

Policy Owner: General Manager

Approved By: Board of Directors

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Applies To: All employees, volunteers, contractors, hirers, clubs, coaches, officials and visitors using SOG Sports Complex Ltd.

Review Frequency: Annually

39. Equality Statement

SOG Sports Complex Ltd is committed to providing a sporting environment that is inclusive, welcoming and free from discrimination.

Safeguarding arrangements shall be applied fairly and consistently, recognising that individuals may require different forms of support to achieve equal protection.

Reasonable adjustments shall be made wherever practicable to ensure that safeguarding procedures remain accessible to all users of the Complex..

40. Policy Commitment

The Board of Directors and the management of SOG Sports Complex Ltd are fully committed to maintaining a culture in which safeguarding is recognised as everyone's responsibility.

The organisation will:

- place welfare at the centre of decision-making;
- promote respect and dignity;
- encourage the reporting of concerns;
- respond promptly and appropriately;
- work collaboratively with relevant authorities;
- continually improve safeguarding arrangements.

SOG Sports Complex Ltd recognises that safeguarding is a shared responsibility. While clubs, schools and organisations hiring the Complex remain responsible for safeguarding their participants, SOG Sports Complex Ltd is committed to providing a safe environment, promoting good safeguarding practice and taking appropriate action whenever safeguarding concerns arise.

41. Safeguarding Risk Management

41.1 Policy Statement

SOG Sports Complex Ltd recognises that safeguarding is most effective when potential risks are identified and managed before harm occurs.

Safeguarding risk management is an integral part of the organisation's overall governance framework and complements existing health and safety arrangements.

The organisation is committed to identifying, assessing and controlling safeguarding risks associated with its facilities, activities, events and operations.

41.2 Risk Assessment

Safeguarding risks shall be considered whenever:

- new activities are introduced;
- new programmes commence;
- facilities are altered;
- significant events are organised;
- external organisations hire the Complex;
- concerns have previously been identified.

Risk assessments should consider:

- participant age;
- disability;
- supervision;
- access arrangements;
- changing facilities;
- transport;
- medical needs;
- emergency procedures;
- photography;
- live streaming;
- public access.

41.3 Dynamic Risk Assessment

Employees should continually assess safeguarding risks during activities.

If circumstances change, appropriate action should be taken immediately to reduce risk.

Examples include:

- overcrowding;
- inadequate supervision;
- inappropriate behaviour;
- unauthorised persons entering activity areas;
- medical emergencies;
- safeguarding disclosures.

41.4 Learning from Risk

Following incidents, safeguarding risk assessments should be reviewed and amended where necessary.

42. Safeguarding Communication and Awareness

SOG Sports Complex Ltd recognises that not all users of the Complex will read or receive a copy of this policy. The organisation will therefore promote safeguarding awareness by:

- displaying safeguarding notices at reception and other prominent locations;
- making the Safeguarding Summary & Quick Guide available at reception and on the SOG Sports Complex website;
- including safeguarding information within Conditions of Hire and booking documentation;
- displaying the contact details on the Notice Board of the Designated Safeguarding Lead and emergency safeguarding contacts;
- promoting safeguarding awareness through induction, staff training and periodic communications.

43. Declaration

Employees should confirm that they:

- have read the policy and any following updates;
- understand the policy;
- agree to comply with the policy.

44. Hirer

Each club or organisation, association etc using the Complex shall provide an annual safeguarding declaration before regular bookings commence.

45. Conclusion

SOG Sports Complex Ltd believes safeguarding is not simply a statutory requirement but a moral responsibility.

Every child, young person and adult at risk has the right to enjoy sport and recreation within an environment that is safe, inclusive and respectful.

This policy establishes the framework through which SOG Sports Complex Ltd seeks to prevent harm, promote wellbeing and respond appropriately whenever concerns arise.

Safeguarding is everyone's responsibility.

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Every concern matters.

Every individual deserves to feel safe.

The Board of Directors, employees, volunteers, clubs and visitors all share responsibility for ensuring that the values contained within this policy are reflected in everyday practice.

Through strong leadership, clear procedures and a commitment to continuous improvement, SOG Sports Complex Ltd will continue to promote a culture in which safeguarding is embedded throughout every aspect of its work.

APPENDIX A



Safeguarding Statement

SOG Sports Complex Ltd believes that every child, young person and adult at risk has the right to enjoy sport, recreation and community participation in an environment where they feel safe, respected, valued and included.

The welfare of the individual shall always be the primary consideration in every decision affecting their participation within the Complex.

We are committed to promoting a culture where safeguarding is recognised as everyone's responsibility and where all individuals are encouraged to speak up if they have concerns about the safety or wellbeing of another person.

SOG Sports Complex Ltd will take all reasonable and proportionate measures to:

- protect children and adults at risk from abuse, neglect, exploitation, bullying and discrimination;
- promote safe working practices for employees, volunteers, contractors and sports organisations using the Complex;
- ensure safeguarding concerns are reported promptly and managed appropriately;
- work collaboratively with statutory agencies where required;
- provide appropriate safeguarding awareness and training for employees;
- ensure that organisations hiring the Complex understand and discharge their own safeguarding responsibilities;
- maintain appropriate confidentiality whilst recognising that safeguarding concerns may require information to be shared with relevant authorities;
- continually review safeguarding practices to ensure compliance with legislation and recognised good practice.

Safeguarding extends beyond protecting individuals from harm. It includes promoting dignity, equality, inclusion, wellbeing and the right of every person to participate in sport and recreation free from fear of abuse or discrimination.