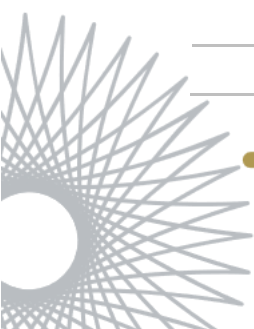


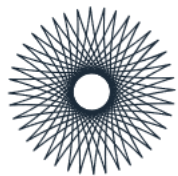
Child Protection and Adults at Risk Policy

Authors	Euan Robertson
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Review Date	28/07/26
Overview	This policy outlines how child protection and adult-at-risk safeguarding is managed within Oriam, including recruitment, code of conduct, responding to disclosures, online safety and digital communication, and age of access and supervision. This includes child guests, children attending through third-party lets, and children accessing services provided directly by Oriam.
Associated Documents	HWU Global Equality, Diversity & Inclusion Policy HWU Global Recruitment & Selection Policy Oriam Photography & Filming Policy Managing Children SOP

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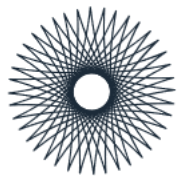
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1. Objective

This policy outlines a framework that all service areas must follow to ensure consistency of approach, so that situations that arise are dealt with as quickly as possible, sympathetically and fairly, whilst protecting the interests and rights of victims, the accused, and Oriam.

2. Responsibilities

Oriam will through the dispensation of this policy and its procedures:

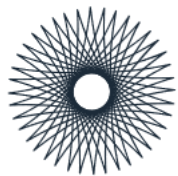
- Accept the moral and legal responsibility to provide a duty of care for young people and Adults at Risk and implement procedures to safeguard their well-being and protect them from abuse whilst they are users of Oriam's services.
- Respect and promote the rights, wishes and feelings of young people and adults at risk for whom Oriam are responsible, and other facility users
- Recruit, train and supervise employees and volunteers to adopt best practice to safeguard and protect young people from abuse, and protect its employees against false allegations (employees includes full time, part time and volunteers)
- Require employees and volunteers to adopt and abide by this policy and procedure
- Respond to any allegations of abuse in line with these procedures, as well as implementing the relevant disciplinary and appeals procedures where appropriate
- Review and evaluate this policy and supporting procedures on a regular basis
- Ensure staff carry out a yearly knowledge check of this policy

3. Principles

The guidance given in this Child Protection and Adults at Risk Policy and procedures is based on the following principles:

- The welfare of young people and adults at risk is of primary concern (the Children (Scotland) Act 1995 defines a child as under 16, and a young person as aged 16 to 18).
- All people, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity, have the right to protection from abuse.
- It is the responsibility of child protection experts to determine whether abuse has taken place, but it is everyone's responsibility to report any concerns.
- All incidents of suspicious behaviour and related allegations will be taken seriously and responded to swiftly and appropriately.
- All incidents of poor practice and related allegations will be taken seriously and responded to swiftly and appropriately.
- Confidentiality will be upheld in line with the UK GDPR and Data Protection Act 2018, the Human Rights Act 1998, and Oriam's policies and procedures related to these areas.





4. Review

This Child Protection & Adults at Risk policy and associated procedures will be reviewed every 2 years. The policy will also be reviewed in the following circumstances:

- As a result of and changes in legislation
- Following a procedural review as a result of a significant incident

Please see Appendix 1 for a list of definitions

5. Recruitment and Employment

All reasonable steps must be taken to ensure unsuitable people are prevented from working with children and adults at risk. For all positions that require regular contact with children or adults at risk, the following recruitment procedures must be completed.

5.1 Advertising

All forms of advertising used to recruit staff members for positions involving regular contact with children or adults at risk will include the following:

- The aims of Oriam and, where appropriate, details of the particular programme involved
- The responsibilities of the role
- The level of experience or qualifications required (e.g. experience of working with children is an advantage)
- Details of Oriam's open and proactive stance on child and adult at risk protection

5.2 Pre-Application Form

Pre-application information will be sent to applicants and will include:

- A job description including roles and responsibilities.
- A candidate specification.
- An application form and self-declaration form.
- Information on Oriam and related topics.

5.3 Application Form

All applicants will be requested to complete an application form via the Heriot Watt University website, to obtain relevant details from the applicant for the position.

5.4 References

References will be sought as required. Where possible, at least one reference will be from an employer or voluntary organisation where the position involved working with children or adults at risk. If the applicant has no such experience, specific training requirements will be agreed before appointment or during induction.

5.5 Checks

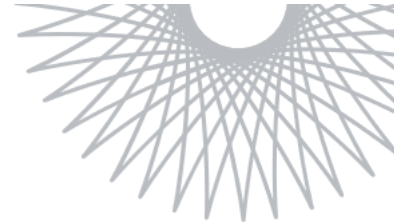
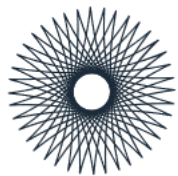
Heriot-Watt University is registered with the Central Registered Body for Scotland and carries out Disclosure Scotland PVG checks on Oriam's behalf. Oriam is also able to process basic disclosures independently. As recommended by Disclosure Scotland, the following checks apply:

- **Standard Disclosure** – for positions listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, including roles involving regular contact with children and young people under 18, and the elderly, sick and handicapped.
- **Enhanced Disclosure** – for positions involving a greater degree of contact, training, supervising, or sole charge of children and young people.

5.6 Interview

For positions requiring regular contact with children or adults at risk, interviews will be carried out and will include requests for additional information to support the application.





5.7 Offer of Position

Once a decision has been made, an offer letter will be presented including the details of the position, any special requirements, and the obligations (e.g. agreement to Oriam's policies and procedures, the probation period, and responsibilities). Confirmation of acceptance requires the offer letter to be signed, dated and returned.

5.8 Induction

Induction for newly appointed staff will include:

- An assessment of training, individual aids and other needs and aspirations.
- Clarification, agreement and signing up to this Policy and Procedures.
- Clarification of the expectations, roles and responsibilities of the position.

5.9 Training

Newly appointed staff members will complete the following training over an agreed period:

- Protecting children and adults at risk
- Working effectively with children and adults at risk (including presentation skills, developing child and adults at risk friendly resources and activities)
- Any other identified training needs

5.10 Probation

Newly appointed members will complete a six month period of probation on commencement of their role.

5.11 Monitoring and Performance Appraisal

All staff in contact with children or adults at risk will be monitored and their performance appraised, providing an opportunity to evaluate progress, set new goals, identify training needs, and address any concerns of poor practice.

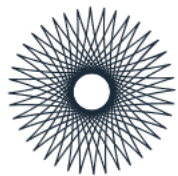
6. Staff with Specific Responsibility

The Welfare Officer has specific responsibility for the protection of children and adults at risk within Oriam, contactable on 0131 451 8411 during working hours. Out of hours, the Duty Supervisor Team assumes responsibility to listen, respond, and report any incident using the Incident Report Form.

The responsibilities of the Welfare Officer are to:

- Implement and promote this Policy and Procedures.
- Act as the main contact within Oriam for the protection of children and adults at risk.
- Provide information and advice on protection matters.
- Support and raise awareness of protection issues.
- Communicate with staff on issues of child and adult at risk protection.
- Keep abreast of developments in data protection, confidentiality, and other relevant legal issues.
- Encourage good practice and support of procedures to protect children and adults at risk.
- Establish and maintain contact with local statutory agencies, including Police Scotland and the Social Work Department.
- Maintain confidential records of reported cases and action taken, and liaise with statutory agencies.
- Organise training for staff and volunteers, in conjunction with the relevant head of department.
- Regularly monitor and review this Policy and Procedures.





7. Code of Conduct

7.1 Good Practice

Oriam supports and requires the following good practice with children and adults at risk:

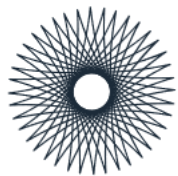
- Make sport fun, enjoyable and promote fair play.
- Always be publicly open when working with children/adults at risk, avoiding situations where a coach and individual cannot be observed.
- Minimum physical contact is encouraged; employees and volunteers will discourage participants seeking excessive contact.
- Coaches/teachers will move around the whole group, paying equal attention to all.
- Manual support (e.g. in gymnastics) should be provided openly and according to National Governing Body guidelines.
- Parents and carers are responsible for dressing participants appropriately.
- Maintain a safe and appropriate distance with participants.
- Children/adult at risk will be escorted around Oriam facilities when under the care of coaching staff, including to toilet areas; coaches will wait at the entrance in public areas.
- All participants will be treated equally and with respect and dignity.
- Safety and welfare of participants will always be given the highest priority.
- Employees and volunteers must behave in an exemplary manner and be a role model for excellent behaviour.
- Employees and volunteers will keep up to date with technical skills, qualifications and professional development.
- Motivate participants through positive and constructive feedback.
- Maintain a written record of incidents, accidents and repeated misbehaviour, communicated to parents/carers through the coach.
- Where possible, parents/carers are responsible for supervising and changing children/adults at risk in changing areas; where classes must be supervised, staff must remain in public areas at all times.
- Children under 8 should be taken into an 'opposite sex' changing area only when no same-sex adult is available to accompany them; children 8 and over must not be taken into an 'opposite sex' changing area.

7.2 Medical Treatment

If a child or adult at risk requires first aid or medical attention, the following good practice must be followed alongside Oriam's Emergency Action Plan (EAP)

- Where practicable all parents/guardians of children under 16 must complete an Emergency Contact and Medical Consent Form before participating in Oriam-led activities
- Where practicable, parents/guardians of children under 16 must complete an Emergency Contact and Medical Consent Form before participating.
- Be aware of pre-existing medical conditions, medication, or existing injuries.
- Keep a written record of any injury and treatment given, logged through the university's approved incident tracking system.
- Ensure access to medical advice/assistance where possible.
- Only those with a current First Aid qualification should respond to injuries.
- Discuss any course of action with the child/adults at risk in language they understand, seeking permission before acting where possible.
- In serious cases, obtain assistance from a medically qualified professional as soon as possible, per the EAP.
- Inform parents/guardians of any injury and action taken as soon as possible, unless advised otherwise.
- Complete and sign an Accident Report Form and pass it to Oriam as soon as possible to record on the university's approved incident tracking system..





7.3 Transportation of Participants

Oriam employees are not normally permitted to transport participants in any vehicle; permission must be obtained from the Heriot-Watt University SafeGuarding Services for any exception. Responsibility for transportation to a venue normally lies with the parent/carer.

7.4 Practice to be Avoided

The following practice should be avoided, and should only occur with the full knowledge and consent of a line manager and/or parent/guardian:

- Avoid having 'favourites', which could lead to resentment or false allegations.
- Avoid spending excessive amounts of time alone with children away from others.
- Avoid entering children's rooms unless in an emergency or health and safety issue.
- Avoid taking children to your home.

7.5 Practice Never to be Sanctioned

Inclusive, but not exclusive to:

- Never engage in rough, physical or sexually provocative games, including horseplay
- Never allow or engage in any form of inappropriate touching
- Never make sexually suggestive comments to a child, even in fun
- Never reduce a child to tears as a form of control
- Never allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- Never invite or allow children to stay with you at your home unsupervised
- Never do things of a personal nature for children and adults at risk that they can do for themselves

7.6 Group Movement around Facilities

In a number of Oriam programs participants may require to move from one area of a building to another. In these circumstances, groups will be escorted by the appropriate number of coaches at all times. Ratios are stipulated by National Governing Body guidelines.

7.7 Identification of Employees & Volunteers

Oriam will ensure all employees and volunteers are identifiable by wearing a corporate uniform to ensure that participants are safe in the knowledge of attracting an employee or volunteer's attention.

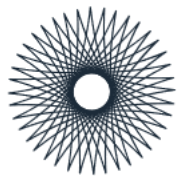
7.8 Risk Assessment

Any activity delivered by Oriam will hold a risk assessment for the activity. This must specifically detail how they will manage child protection risks. This must be approved by a competent person before the activity will be confirmed.

7.9 Supervision of Children

- Children under 16 must have a responsible adult or carer present in the building at all times (Section 7.9).
- Children under 12 must be under the direct supervision of a parent/guardian or coach at all times when at Oriam (Managing Children SOP, Sections 2.5 / 3.3).
- Children under 8 must additionally be accompanied by that parent/guardian or coach at all points of access, not just supervised at a distance (Managing Children SOP, Section 1.3).
- Once an induction has been completed, children aged 14–16 may use the gym unsupervised provided the responsible adult/carer remains in the building (Section 7.9).
- Children aged 10–13 may use the gym or specific classes provided an adult/carer is present with them in the gym or class (Section 7.9)





7.10 Reporting

It is very important if any of the following incidents should occur, that they are reported on the day to their line manager, and an Oriam Incident Record Form is completed (Appendix 3). Parents should also be informed of the incident. It is expected that staff will apply judgement and common sense when reporting an incident for example, in any of the following circumstances:

- If you accidentally hurt a child or adult at risk
- If a child or adult at risk seems distressed in any manner
- If a child or adult at risk misunderstands or misinterprets something you have done that has serious implications
- If a child or adult at risk appears to be sexually aroused by your actions
- If a child or adult at risk needs to be restrained

7.11 Anti Bullying

Oriam aims to safeguard children (under 18) and adults at risk from bullying, ensuring a safe and enjoyable environment. Bullying is defined as repeated abusive behaviour intended to cause harm. The policy applies to all stakeholders at the venue, including staff, coaches, volunteers, players, and parents. It emphasizes that:

- Everyone has a role in preventing bullying, with a focus on recognizing diversity and upholding safety and respect.
- Bullying behaviour is not tolerated; incidents are promptly addressed, and support is provided to both victims and those displaying bullying behaviour.
- Children are encouraged to report bullying, with provisions to help them speak openly.
- Parents are involved in handling bullying incidents and provided with advice and resources for support.

8. Photographing, Videoing and Filming of Children and Adults at Risk

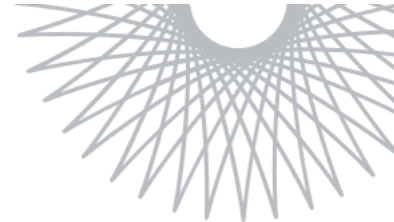
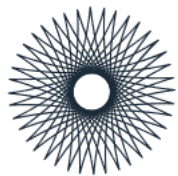
8.1 Photo and Video use in Oriam

There is evidence that some people have used sporting venues and activities as an opportunity to take inappropriate photographs or film footage of children and adults at risk. The following procedures have been developed to protect children and adults at risk.

The following is required for Oriam activities or events where children or adults at risk are participating:

- Where appropriate all materials promoting Oriam events or activities shall state that accredited photographers will be present
- Consent from the parent/guardian for photographing, videoing and/or filming of a child or adult at risk must be obtained prior to the event or activity
- Where possible anyone wishing to use photographic/film/video equipment at a venue must obtain the approval of Oriam
- An activity or event specific identification badge/sticker must be provided to and clearly displayed at all times by accredited photographers, film and video operators on the day of the activity or event – this should be supplied by the user/booker
- No unsupervised access or one-to-one sessions are to be permitted unless this has been approved in advance by the child or adults at risk, parent/guardian and the organisation, and appropriate vetting has occurred e.g. Disclosure Scotland check of individual wanting to photograph, film or video
- Oriam reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated





- The requirements above are publicly available to ensure all people present at the event or activity understand the procedure and are aware of whom to contact if concerned

8.2 Concerns about Photographers, Video or Film Operators

Any concerns with photographers or video or film operators are to be reported to Oriam's Welfare Officer or where relevant directly to the Police.

9. Children or Adults at Risk in Publications and Websites

9.1 Websites and Publications

Sport websites and publications provide excellent opportunities to broadcast achievements of individuals to the world and to provide a showcase for the activities of young people or adults at risk. In some cases, however, displaying certain information about children and adults at risk could place them at risk. The following procedure must be followed to ensure Oriam publications and information on the internet does not place children and adults at risk in danger.

Oriam publications and information on the internet must adhere to the following:

- Publications or information on an Internet site must never include personal information that could identify a child or adult at risk e.g. home address, e-mail address, telephone number.
- Any contact information must be directed to either Oriam or another relevant organisation's address, for example another governing body
- Before publishing any information about a child or adults at risk, written consent must be obtained from the child or adults at risk parent/guardian. If the material is changed from the time of consent, the parents/guardians must be informed and consent provided for the changes
- The content of photographs or videos must not depict a child or adult at risk in a provocative pose or in a state of partial undress other than when depicting a sporting activity. Where relevant, a tracksuit may be more appropriate attire. Children and adults at risk must never be portrayed in a demeaning or tasteless manner
- For photographs or videos of groups or teams of children or adults at risk ensure that only the group or team is referred to, not individual members. Credit for achievements by a child or adults at risk are to be restricted to first names e.g. Tracey was Player of the Tournament
- All published events involving children or adults at risk must be reviewed to ensure the information will not put children or adults at risk in danger. Any publications of specific meetings or child/adults at risk events e.g. team coaching sessions, must not be distributed to any individuals other than to those directly concerned
- Particular care must be taken in publishing photographs, film or videos of children or adults at risk who are considered particularly vulnerable e.g. the subject of a child or adult at risk protection issue or a custody dispute
- Particular care is to be taken in publishing photographs, films or videos of children or adult at risk with physical, learning and/or communication or language disabilities, as they could be particularly vulnerable to abuse (Morgan, 1979; Watson, 1984#).

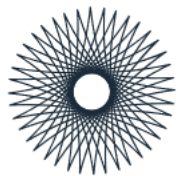
9.2 Concerns about Websites and Publications

Any concerns or enquiries about publications or Internet information should be reported to Oriam's Welfare Officer.

10. Online Safety and Communication

This section sets out how Oriam and its staff, coaches & volunteers use the internet, social media and other digital communication in connection with all sports, activities and services delivered at or through Oriam,





and the standards expected when communicating online with children and adults at risk. It applies across all Oriam programmes and facilities, regardless of which sport, class, event or activity is involved, and should be read alongside Section 8 (Photographing, Videoing and Filming of Children and Adults at Risk) and Section 9 (Children or Adults at Risk in Publications and Websites) above.

10.1 Purpose and Scope

The principles in this section apply regardless of which current or future technology is used, and regardless of which sport, class, programme or event is involved.

The purpose of this section is to:

- Protect children and adults at risk involved with Oriam who make use of technology, such as mobile phones, tablets, games consoles and the internet.
- Provide staff, coaches, volunteers and partner organisations with policy and procedure information regarding online safety, and inform them how to respond to incidents.
- Ensure Oriam operates within the law regarding how it behaves online.

This section applies to all staff, coaches, volunteers, participants, parents/carers, hirers, and any other individuals associated with activities delivered at or through Oriam.

10.2 Principles – Keeping People Safe Online

We recognise that:

- the online world provides everyone with many opportunities; however, it can also present risks and challenges
- Oriam has a duty to ensure that all children and adults at risk involved in its activities are protected from potential harm online
- Oriam has a responsibility to help keep children safe online, whether or not they are using Oriam's network and devices
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- working in partnership with children, their parents/carers, sport-specific National Governing Bodies (NGBs) and other organisations is essential in helping them to be responsible in their approach to online safety

Oriam will seek to keep people safe by:

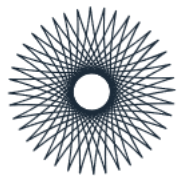
- understanding the safety aspects, including what is acceptable and unacceptable behaviour for staff, coaches, volunteers and children, when using websites, social media, apps and other forms of digital communication
- recognising that it doesn't matter what device is being used for digital interaction; the same safety principles apply whether it is a computer, mobile phone or games console
- when using social media or video conferencing platforms (including live streaming), ensuring that Oriam adheres to relevant legislation and good practice
- ensuring the person(s) managing Oriam's online presence are suitably trained and experienced
- providing staff with policy and procedure information regarding online safety and informing them how to respond to incidents

10.3 Managing Our Online Presence

Oriam's online presence through its website or social media platforms will adhere to the following guidelines:

- all social media accounts will be password-protected, and at least two members of staff and/or volunteers will have access to each account and password
- social media accounts will be monitored by Oriam's Marketing Manager
- the designated person managing Oriam's online presence will seek advice from the Welfare Officer and, where relevant, the sport-specific National Governing Body (NGB), on safeguarding requirements as required





- the designated person will remove any inappropriate posts, explaining why, and informing anyone who may be affected (as well as the parents of any children involved)
- social media pages/groups are not used to communicate with children
- identifying details such as a child's home address, school details, telephone number or email will not be posted on social media platforms
- any posts or correspondence will be of a professional purpose
- customers will be made aware of who manages Oriam's social media accounts and who to contact if they have any concerns about the running of the account
- Oriam will not communicate with children through social media, via video conferencing platforms or by any other means of online communication
- parents will need to give consent for photographs or videos of their child to be posted on social media, in line with Section 8 of this policy
- all Oriam accounts and email addresses will be appropriate, fit for purpose and used only for Oriam-related activities

10.4 Responsibilities of Staff, Coaches and Volunteers

Staff, coaches and volunteers delivering any sport or activity at Oriam are expected to:

- be aware of this section and behave in accordance with it
- seek advice from the Welfare Officer and, where relevant, the sport-specific NGB, if they have any concerns about the use of the internet or social media
- ensure any messages sent out to children are sent through the designated person responsible for Oriam's online presence
- not 'friend' or 'follow' children from personal accounts on social media, and maintain the same professional boundaries online as they would in person when using organisational accounts
- make sure any content posted is accurate and appropriate
- not communicate with children via personal accounts or private messages
- communicate with parents through email or in writing, or use an organisational account, profile or website rather than personal social media accounts
- copy in parents or at least one other member of staff, coach or volunteer to any communications sent to children
- avoid communication with children beyond dedicated event or activity timings, unless necessary for professional purposes (for example emergencies, or whilst on a trip) and contacting the parents is not possible
- sign off any communication in a professional manner, avoiding the use of emojis or symbols such as kisses ("x")
- respond to any concerns reported through social media in the same way as a face-to-face disclosure, in accordance with Section 10 of this policy
- not engage in sexting, or send pictures or messages that are abusive, obscene, inappropriate, indecent or menacing to anyone
- ensure any 1-2-1 sessions with children involve parents/carers being able to supervise their child, or that another coach/member of staff is present; this supervision does not necessarily require the parent to be in the same room, as long as they are able to check in on the session

10.5 Responsibilities of Children, Young People and Adults at Risk

Children, young people and adults at risk taking part in activities at Oriam are expected to:

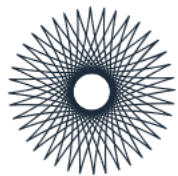
- be aware of this section
- behave responsibly online and refrain from any bullying or abusive behaviour

10.6 Responsibilities of Parents/Carers

Parents and carers are expected to:

- be aware of this section and behave in accordance with it
- seek advice from the Welfare Officer and, where relevant, the sport-specific NGB, if they have any concerns about the use of the internet or social media
- communicate with staff, coaches and volunteers in a professional and appropriate manner





- not engage in sexting, or send pictures or messages that are abusive, obscene, inappropriate, indecent or menacing to anyone

10.7 Communicating by Mobile Phone and Other Devices

When using mobile phones or other devices to communicate, Oriam will take the following precautions to help keep children safe:

- staff, coaches and volunteers will communicate through parents directly or copy them into all messages to children
- where it is necessary to contact children directly and it is not possible to copy in the parents, consent will be sought from parents, or a second practitioner will be included
- where one-to-one communication by text message is needed, the message will not be deleted from the device, to ensure an audit trail exists
- messages will be used for professional communication only, such as reminders about session times or meeting points
- if staff, coaches or volunteers only have one mobile phone and a second business phone is not possible, they will ensure parents and the child understand this, and agree and adhere to clear boundaries
- if a child tries to engage a member of staff, coach or volunteer in a conversation which is not of a professional nature, the member of staff, coach or volunteer will end the conversation or not reply; inform the Welfare Officer as soon as possible and arrange to address the matter with the child and their parents appropriately, in line with Section 10 of this policy; and, if the conversation raises safeguarding concerns, notify the relevant sport-specific NGB as soon as possible

Use of mobile phones/devices during activities

So that all participants can enjoy and actively take part in Oriam's activities, the use of mobile phones/devices during sessions is discouraged. As part of this section, Oriam will:

- make children aware of how and who to contact if there is an emergency or a change to previously agreed arrangements
- advise parents that it may not be possible to contact children during activities, and provide a contact within Oriam who will be reachable should there be an emergency
- explain to children how using mobile phones during activities can affect their awareness of their environment, and their level of participation and achievement

11. Responding to Disclosures, Suspicions and Allegations of Abuse

11.1 Scope

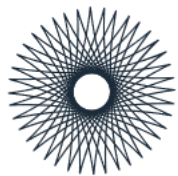
Any allegation of physical or sexual abuse must be taken seriously. Although false allegations of abuse do occur, they are rare. If a child or adult at risk says or indicates that they are being abused or information is obtained which gives concern that a child or adult at risk is being abused, you must react immediately i.e. in line with the following procedures on the day.

11.2 Awareness of Abuse

Oriam accepts that abuse can become apparent in a number of ways:

1. Through observation
2. A child or adult at risk may tell us
3. A third party may have reported an incident, or may have a strong suspicion
4. An employee or volunteer may have a suspicion





11.3 Types of Abuse

Abuse can take many forms:

- Emotional
- Neglect
- Non Organic failure to thrive
- Physical
- Sexual
- Negative discrimination
- Bullying
- Abuse of position of trust

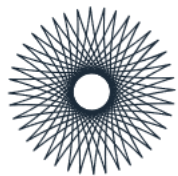
This policy and any associated procedures will deal with all forms of abuse.

11.4 Responding to a Disclosure

Children and young people participating in coached activity sessions are likely to confide in coaching staff/ teachers as children tell people that they trust. Sports coaches are 'role models' and often become aware of abuse. Any staff member or volunteer on receiving information concerning a disclosure follow the steps below (also summarised in a flowchart in Appendix 2):

- React calmly so as not to frighten the child/adult at risk
- Listen to the child/adult at risk.
- Do not show disbelief
- Tell the child/adult at risk that they are not to blame and that they were right to tell
- Take what the child/adult at risk says seriously while recognising the difficulties inherent in interpreting what a child/adult at risk says especially if they have a speech disability and/or differences in language
- Do not pre-suppose that the experience was bad or painful – it may have been neutral or even pleasurable. Always avoid projecting your own reactions onto the child
- If you need to clarify, keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said
- If you need to clarify or the statement is ambiguous use open-ended, non-leading question
- Do not introduce personal information from either your own experiences or those of other children
- Reassure the child/ adult at risk
- Report your concerns on the day to the Welfare Officer and/or the Social Work Department or the Police in the area where the abuse is alleged to have occurred (these services are available 24 hours a day)
- If you're not sure about what to do, you can also obtain advice by telephoning the NSPCC free phone Helpline. The number is 0808 800 5000 and is open 24 hours
- Make a full record of what has been said, heard and/or seen as soon as possible in the child/adult at risk's own words. If available, include the following information:
 - Name of child/adult at risk
 - Age, date of birth of child/adult at risk
 - Home address and telephone number of the child/adult at risk
 - The nature of the allegation in the child's own words
 - Any witnesses to the incident/s
 - Any times, dates or other relevant information
 - Whether the person making the report is expressing their own concern or the concerns of another person
 - The child/adult at risk's account, if it can be given, of what has happened and how any bruising or other injuries occurred
 - The nature of the allegation (include all of the information obtained during the initial account e.g. time, date, location of alleged incident if available)
 - A description of any visible injuries or bruising, behavioural signs, indirect signs





- Details of any witnesses to the incident
- Whether the child/adult at risk's parent or guardian have been contacted
- Details of anyone else who has been consulted and the information obtained from them
- If it is not the child/adult at risk making the report, whether the child/adult at risk been spoken to, if so what was said
- Record, sign and date on the day what you have seen or been told, using Oriam's Referral Form (Appendix 4).
- If making an electronic copy do not save to the hard drive. Print off the record, sign and date, then delete electronic copy, all on the day

11.5 Actions to Avoid

On receiving information concerning a disclosure:

- Do not panic
- Do not allow shock or distaste to show
- Do not probe for more information than is offered
- Do not speculate or make assumptions
- Do not make negative comments about the alleged abuser
- Do not approach the alleged abuser
- Do not make promises or agree to keep secrets
- Do not give a guarantee of confidentiality

11.6 Allegations of Abuse Against Employees And Volunteers

Abuse can and does occur outside the family setting. Although it is a sensitive and difficult issue, abuse has occurred within institutions and may occur within other settings, for example, sport or other social activities. Recent reports indicate that abuse which takes place within a public setting, are rarely a one-off event. It is crucial that all employees and volunteers are aware of this possibility and that all allegations are taken seriously and appropriate action taken.

The Line Manager may be informed of situations where they are unsure about whether the allegation constitutes abuse or not, and are therefore unclear about what action to take. There may be circumstances where allegations are about poor practice rather than abuse but those responsible should always consult with senior colleagues, and gain advice from Education and Children's Services, or the NSPCC where there is any doubt. This is because this may be just one of a series of other instances which together cause concern.

It is acknowledged that feelings generated by the discovery that an employee or volunteer is, or may be abusing, will raise concerns among other employees or volunteers, including the difficulties inherent in reporting such matters. However, it is important that any concerns for the welfare of the individual arising from abuse or harassment by a member of staff or volunteer should be reported immediately.

Oriam would want to assure all employees and volunteers that it would fully support and protect anyone who, in good faith, reports his or her concern that a colleague is or may be abusing an individual.

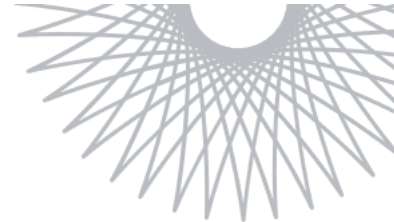
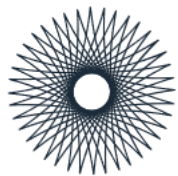
Where there is a complaint of abuse against a member of staff, there may be three types of investigation:

1. A criminal investigation
2. A child protection & adult at risk investigation
3. A disciplinary or misconduct investigation

The results of a Police Scotland and/or Social Services investigation may well influence the disciplinary investigation, but not necessarily.

If, following consideration the allegation is clearly about poor practice then the Line Manager will deal with this as a misconduct issue.





If the allegation is about poor practice by the Line Manager, or where the matter has been handled inadequately and concerns remain, then this should be referred to the Welfare Officer or to a member of the Oriam Senior Management Team (SMT). Oriam SMT will decide how this will be dealt with case by case and whether or not to initiate disciplinary proceedings.

Any suspicion that an individual has been abused by either an employee or a volunteer will be reported to the Welfare Officer or to a member of Oriam SMT who will take such steps as they consider necessary to ensure the safety of the child/adult at risk in question and any other child/adult at risk who may be in jeopardy.

Where appropriate the Welfare Officer will refer the allegation to Social Work Department who may involve the police.

The parents or carers of the individual will be contacted as soon as possible following advice from the Social Work Department.

Every effort should be made to ensure that confidentiality is maintained for all concerned.

If the Line Manager is the subject of the suspicion/allegation, the report must be made to the Welfare Officer who is then responsible for taking the action outlined above.

Oriam will make an immediate decision as to whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

Irrespective of the findings of the Social Work Department or police enquiries, Oriam must assess all individual cases under the appropriate misconduct/disciplinary procedure, to decide whether an employee or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, the Oriam Executive must reach a decision based upon the information that is available which could suggest that on a balance of probability it is more likely than not that the allegation is true. The welfare of children and adults at risk should always remain paramount.

Consideration should be given to what support may be appropriate to children, adults at risk, parents, employees and volunteers.

11.7 Allegations of Historical Abuse

Allegations of abuse may be made at some period of time after the event. For example, by an adult who was abused as a child by an employee or volunteer who is still currently working with children or adults at risk. Where such an allegation is made, Oriam will follow the procedures given above and report the matter to the Education and Children's Services or the police. This is because other individuals may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children and adults at risk.

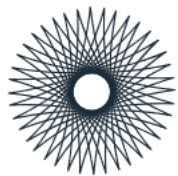
11.8 False or Malicious Allegations

Where an investigation of abuse has been conducted and is unfounded the staff member/ volunteer will receive an account of the circumstances and/or investigation and a letter confirming the conclusion of the matter. Where after reviewing the details of the account of the circumstances or the investigation it is clear that the allegation has been malicious or unfounded, the person may wish to seek legal advice.

Oriam will take all reasonable steps to support the individual in this situation. In these circumstances, Oriam reserves the right to discontinue a child's access to that activity.

Data collected for the investigation will be destroyed in accordance with the requirements of the UK GDPR and Data Protection Act 2018.





12. Sharing concerns with Parents, Guardians or Carers

12.1 Where it is Not Abuse

There is always a commitment to work in partnership with parents and carers where there are concerns about their children/adults at risk. Therefore in most situations, not involving the possibility of child or adult at risk abuse, it would be important to talk to parents and carers to help clarify any initial concerns. For example, if a child or adult at risk seems withdrawn, there may be a reasonable explanation. They may have experienced an upset in the family, such as a parental separation, divorce or bereavement.

12.2 Allegations of Abuse

There are circumstances in which a child or adult at risk might be placed at even greater danger if concerns are shared e.g. where a parent/guardian/carer may be responsible for the abuse or not able to respond to the situation appropriately. In these situations or where concerns still exist, any suspicion, allegation or incident of abuse must be reported to the Welfare Officer and/or follow the flowchart in appendix 2 as soon as possible.

In all cases of abuse, advice and guidance is to be sought from the local Social Work Department or Police as to who contacts the parents.

13. Legal Framework

This policy and procedures have been informed by the legislation and guidance listed in appendix 5.

14. Whistleblowing

Whistleblowing is when someone reports wrongdoing on the basis that it is in the public interest for the wrongdoing to be brought to light. This can include:

- Oriam or another organisation does not have clear safeguarding procedures to follow
- Concerns are not dealt with properly or may be covered up
- A concern that was raised has not been acted upon
- There is concern that repercussions are likely to arise if a concern is raised

This applies to incidents that happened in the past, are happening now, or may happen in the future.

Whistleblowers should contact the Welfare Officer in the first instance.

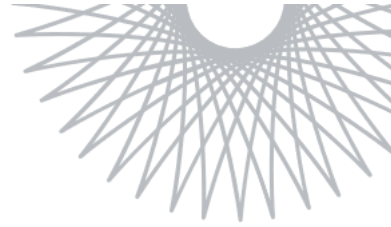
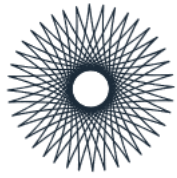
Where a concern relates to Oriam itself, or the whistleblower feels it would not be appropriate to raise it with the Welfare Officer (for example, if the concern involves the Welfare Officer directly, or the whistleblower has concerns about how it would be handled internally), the matter should instead be escalated via Heriot-Watt University's Public Interest Disclosure (Whistleblowing) Policy, available at: <https://www.hw.ac.uk/document-library/hr/public-interest-disclosure-whistleblowing-policy.pdf>

If the whistleblower does not wish to speak to someone within the venue, the NSPCC Whistleblowing advice line can be contacted on 0800 028 0285 or by e-mailing help@nspcc.org.uk.

Independent, confidential and, if required, anonymous reporting is also available where there are serious concerns regarding any of the following public interest areas:

- Criminal offences, including fraud
- Failure to comply with a legal obligation
- Legal miscarriage of justice
- Endangering someone's health and safety
- Damage to the environment





- Covering up wrongdoing in any of the above categories

Such concerns can be reported to Protect (formerly Public Concern at Work), the independent whistleblowing charity, via their helpline on 020 3117 2520, or online at <https://protect-advice.org.uk>

Appendix 1 – Definition of Terms

Child:

A child is defined as anyone under 16 years of age.

16-18 year olds:

Young people aged 16-18 years are sometimes classified as children in Scotland. In terms of the Children (Scotland) Act 1995, a 16-18 year old will be regarded as a child if they are subject to a supervision requirement through a Children's Hearing.

For the purposes Part V of the Police Act 1997 a child is defined as anyone under the age of 18 years.

Adults at Risk

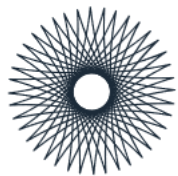
The term Adult at Risk refers to any person aged 16 or over who for the time being are:

- 1) Are unable to safeguard their own welfare or properly manage their financial affairs and,
- 2) Are in one or more of the following categories:
 - a) A person in need of care and attention by reason of either infirmity or the effects of ageing
 - b) A person suffering from illness or a mental disorder
 - c) A person substantially handicapped by a disability

Adults at Risk may be in need of health or social support services and may be unable to take care of him/herself or protect him/ herself from harm and/or exploitation.

A number of studies suggest that children and Adults at Risk are at increased risk of abuse. Various factors contribute to this such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse has occurred.





Appendix 2 – Procedure for Responding to Suspicions and/or Allegations of Abuse of a Child or Adult at Risk against a Member of Staff or Volunteer

Allegations against a member of staff or volunteer are treated with particular seriousness because of the position of trust that person holds. This procedure applies whether the concern relates to a current incident, a historical allegation, or conduct that has caused concern but does not amount to a clear allegation.

Immediate Action

- Do not investigate, confront the individual concerned, or attempt to determine whether the allegation is true. Your role is to report, not to investigate.
- Ensure the immediate safety and welfare of the child or adult at risk concerned.
- Report the concern on the day, without delay, to the Welfare Officer. If the Welfare Officer is unavailable, report to the Duty Supervisor Team, who will escalate as appropriate.
- If the allegation is against the Welfare Officer, report instead to another member of Oriam's Senior Management Team.
- Make a full written record of what has been seen, heard or reported, in the reporter's own words, as soon as possible on the day, using Oriam's Incident Report Form (Appendix 3) or Referral Form (Appendix 4) as appropriate. Or directly onto the university's approved incident tracking system.

Welfare Officer' Response

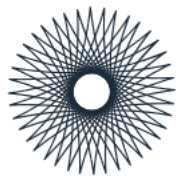
On receiving a report, the Welfare Officer will:

- Consider whether the concern indicates that a child or adult at risk is at immediate risk of harm and, if so, contact the Police and/or Social Work Department without delay (these services are available 24 hours a day).
- Determine, in consultation with the Police and/or Social Work Department where a criminal element may be involved, whether the matter should be treated as a safeguarding referral, an internal disciplinary matter, or both. Where there is any possibility of criminal conduct, the Police and Social Work Department take primacy and Oriam will not carry out its own investigation into the substance of the allegation.
- Consider whether it is necessary to suspend or temporarily restrict the duties of the staff member or volunteer concerned, pending the outcome of enquiries, as a neutral act that does not imply guilt.
- Keep information about the allegation confidential, sharing it only with those who need to know in order to progress the safeguarding referral, any investigation, or the welfare of those involved.
- Ensure the child or adult at risk and their family, where appropriate, are kept informed and supported, without compromising any ongoing investigation.
- Ensure the staff member or volunteer concerned is informed of the nature of the concern, so far as this is compatible with any ongoing investigation, and is made aware of their right to representation and to access appropriate welfare support.

Outcome

Once enquiries have concluded, the outcome will be recorded and appropriate follow-up action taken, which may include: return to normal duties, disciplinary action, referral to Disclosure Scotland or the relevant professional body, or referral to the Police where this has not already happened. Where an allegation is found to be malicious or unfounded, this will also be recorded and appropriate support offered to the staff member or volunteer concerned.

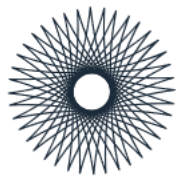




Appendix 3 – Incident Report Form

Participant's Name	
Date & Time Of Incident / Issue	
Description Of Issue/Incident	
Action Taken By Coach	
Parent/Carers Comments	
Action Required	
Parent/Carers Signature	
Staff Signature	





Appendix 4 – Child Abuse Referral Form

This form must be completed **as soon as possible** after receiving information that may suggest that a child is at risk or there are any concerns regarding possible abuse of a child or adult at risk.

Details of person making report:

Name:
Position:
Contact telephone number:
Address:

Details of Child/ Adult at Risk:

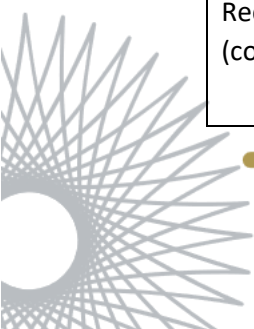
Name:
Date of Birth:
Address:
Contact telephone number:
Names and address of parents/guardian/carers:

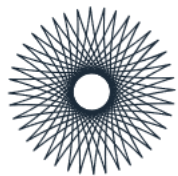
Details of person about whom there is concern:

Name:
Position:
Date of Birth:
Address:

If you are reporting this alleged incident on behalf of someone else, please provide details of that person:

Name:
Position:
Address:
Contact telephone number:
Date this person advised you of alleged incident:
Record here the information you were given from this person about the alleged incident (continue on a separate sheet if necessary):





Details of the alleged incident

Date of alleged incident:
Time:
Place:
Names and addresses of witnesses:
Names and addresses of witnesses:
Describe in detail visible injuries/bruises and concerning behaviour of the child/Adult at Risk, if any (use diagrams if this helps you to describe the injury). Continue on a separate sheet if required):
Was the child/Adult at Risk asked what happened: YES/NO If yes, record exactly what the child said in their own words and any questions asked if the situation needed clarification (continue on a separate sheet if required):

Details of contact with the parent/guardian/carer

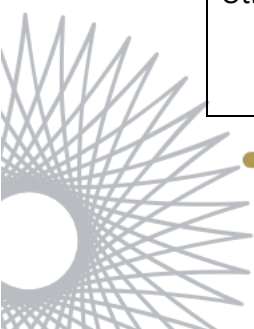
Have the parents and carers been advised of this matter? Yes /No
If yes, by whom and record any action taken by them:

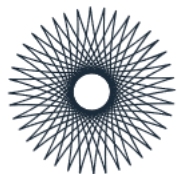
Details of action taken

Detail what action, if any, has been taken, by you, following receipt of this information:
--

Details of external agencies contacted

Police	Police station contacted: Name and contact number of Police Officer: Advice received:
Social Work Department	Social Work Dept: Name and contact number of individual: Advice received:
Other:	Name of organisation: Name and contact number of individual: Advice received:





Other information

Record any other information you have about this matter (it is important that all information is passed on even that which you think is not important or helpful).

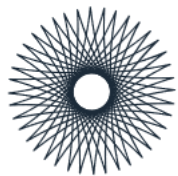
Signature:

Print name:

Date:

PLEASE NOTE: Where a referral has been made to the Police and Social Work Department a copy of this form must be sent to them.





Appendix 5 – Legal Framework

This Policy and supporting Procedures are defined and informed by the following legislation and guidance:

- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions Order) 1975
- UN Convention of the Rights of the Child 1992
- The Children (Scotland) Act 1995
- The Criminal Procedure (Scotland) Act 1995
- Protecting Children A Code of Practice for Voluntary Organisations in Scotland Working with Children and Young People 1995
- The Sex Offenders Act 1997
- The Police Act 1997
- The Human Rights Act 1998
- The UK GDPR and Data Protection Act 2018
- The Scottish Office Protecting Children – A Shared Responsibility: Guidance on inter-agency co-operation 1998
- Sexual Offences (Amendments) Act, 2000
- Adults with Incapacity (Scotland) Act 2000
- Disclosure Scotland Code of Conduct Making Scotland Safer (2002)
- Disclosure Scotland Code of Conduct Protecting the Vulnerable by Safer Recruitment (2002)

Appendix 6 – Contact Details for Reporting Concerns

This appendix provides contact details for reporting child protection and adult support and protection concerns. It should be used alongside Section 14 (Whistleblowing) and the Welfare Officer contact details in Section 6. Where a child or adult at risk lives, or where an incident occurred, outside Edinburgh, contact the local authority for that area – a full council-by-council directory is available at mygov.scot/report-child-protection-concern.

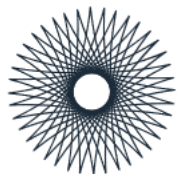
Immediate Danger

Situation	Contact
Crime in progress, or a child or adult at risk in immediate danger	999
Police Scotland (non-emergency)	101

Edinburgh Local Authority – Children and Adults at Risk

Service	Contact
Social Care Direct (City of Edinburgh Council) – single point of contact for reporting a child protection or adult support and protection concern	0131 200 2324
Emergency Social Work Service (out of hours, children and adults)	0800 731 6969
Crimestoppers (anonymous)	0800 555 111





National Helplines

Service	Contact
NSPCC Helpline (for adults concerned about a child)	0808 800 5000 / help@nspcc.org.uk
Childline (for children and young people)	0800 1111
Disclosure Scotland	03000 200 190
Care Inspectorate (concerns about a regulated care service)	0345 600 9527

Whistleblowing

Route	Contact
NSPCC Whistleblowing Advice Line	0800 028 0285 / help@nspcc.org.uk
Protect (independent whistleblowing charity)	020 3117 2520 / protect-advice.org.uk
Heriot-Watt University Public Interest Disclosure (Whistleblowing) Policy	hw.ac.uk/document-library/hr/public-interest-disclosure-whistleblowing-policy.pdf

NOTES

