



Safeguarding Adults in Sport & Physical Activity

Policy and Procedures 2025

Policy approved by: The Herts Sport & Physical Activity Partnership Board

Date policy approved: 18/09/25

Next review date: 18/09/26

Contents

Introduction	1
Purpose of the Policy	1
Setting the Context	1
Terminology used in this Document	2
Part 1 – Policy	3
1.1 Key Principles of this Policy	3
1.2 The Principles of Adult Safeguarding	4
1.3 Guidance and Legislation	4
1.4 Policy Statement	5
1.5 Review	5
1.6 Roles and Responsibilities	5
1.6.1 General Responsibilities of HSP	5
1.6.2 Role and Responsibilities of the HSP Board	6
1.6.3 Role and Responsibilities of the Senior Leadership Team	6
1.6.4 Role and Responsibilities of the Designated Safeguarding Officer	7
1.6.5 Role and Responsibilities of Staff and Volunteers	7
1.6.6 Role and Responsibilities of the Board Safeguarding Champion	8
1.7 The Herts Sport & Physical Activity Partnership Designated Safeguarding Officers	9
1.8 Key Contacts	9
Part 2 – Procedures	10
2.1 Recruitment, Deployment and Training of Staff and Volunteers	10
2.1.1 Staff Recruitment	10
2.1.2 Pre-employment Interview	10
2.1.3 Induction and Training	11
2.1.4 Code of Conduct	12
2.1.5 Monitoring and Review	12
2.2 Recognition of Abuse and Poor Practice	12
2.2.1 Abuse	12

2.2.2 Types of Abuse and Neglect – Definitions from the Care Act 2014	13
2.2.3 Signs and Indicators of Abuse and Neglect	15
2.3 Responding to Concerns.....	16
2.3.1 General Response	16
2.3.2 HSP Staff Response to a Disclosure, Complaint or Concern	17
2.3.3 Confidentiality and Storage of Information.....	18
2.3.4 Making Safeguarding Personal.....	18
2.3.5 Capacity and Consent.....	18
2.3.6 Responding to Suspicions about Staff	19
2.3.7 Responding to Allegations against Staff	19
2.3.8 Support for the Reporter of Suspected Abuse	19
2.3.9 Types of Investigation.....	20
2.3.10 Allegations of Previous Abuse.....	20
Appendices.....	21
Appendix One – Dealing with Concerns and Disclosure for HSP Staff	21
Appendix Two – Reporting Form.....	22
Appendix Three – University of Hertfordshire Policies.....	23

Introduction

Purpose of the Policy

The Herts Sport & Physical Activity Partnership has developed and will implement this Safeguarding Policy and associated procedures to:

- Provide guidance for Herts Sport & Physical Activity Partnership staff and volunteers on safeguarding issues, policy and procedures.
- Provide guidance and share best practice to sport and physical activity organisations in Hertfordshire.
- Articulate minimum safeguarding standards when Herts Sport & Physical Activity Partnership works in partnership with other organisations to provide activities for adults in need of support.
- Provide guidance on safeguarding in specific relationship to sport and physical activity.
- Exist as an example of good practice to sport and physical activity organisations operating in Hertfordshire.

Setting the Context

The Herts Sport & Physical Activity Partnership is hosted by the University of Hertfordshire and provides the function of the Active Partnership in Hertfordshire as recognised by Sport England. This involves working strategically and collaboratively to improve the lives of the people of Hertfordshire, by using the power of sport and physical activity to tackle inequality and disadvantage.

The Herts Sport & Physical Activity Partnership works with sport clubs, local authorities, education services, schools and governing bodies of sport to give people local opportunities for participation in sports and physical activities.

The Herts Sport & Physical Activity Partnership recognises that sport and physical recreation activities often place individuals in a position of trust with significant influence over other people.

This document should be used in conjunction with the Hertfordshire Safeguarding Adults Board's (HSAB) Multi-Agency Safeguarding Adults Policy and Procedures.

For information related to safeguarding children, please refer to the Herts Sport & Physical Activity Partnership [Safeguarding Children and Young People in Sport & Physical Activity Policy](#).

The Herts Sport & Physical Activity Partnership acknowledges that local authorities, schools, national governing bodies of sport, sports clubs and other sports delivery agencies will have their own safeguarding policies. These organisations should follow their own policies and procedures for guidance on safeguarding adult matters.

Terminology used in this Document

The following terms and abbreviations are commonly used in this document:

<i>HSP</i>	The Herts Sport & Physical Activity Partnership.
<i>UH</i>	The University of Hertfordshire.
<i>Sport</i>	Used to define any sport or physical activity.
<i>DBS Check</i>	Means a Disclosure and Barring Service check (the DBS check superseded the CRB check from December 2012 when the Criminal Records Bureau and Independent Safeguarding Authority merged to become the DBS.)
<i>DSO</i>	Designated Safeguarding Officer.
<i>Staff</i>	Staff means any person working or volunteering for or on behalf of HSP.
<i>Adult</i>	Is anyone aged 18 or over.
<i>Adult at Risk</i>	Is a person aged 18 or over who is in need of care and support, regardless of whether they are receiving this, and because of those needs, are unable to protect themselves against abuse or neglect. <i>The term 'vulnerable adult' is no longer used.</i>
<i>Adult safeguarding</i>	Is protecting a person's right to live in safety, free from abuse and neglect.
<i>Abuse</i>	Is a violation of an individual's human and civil rights by another person or persons.
<i>Capacity</i>	Refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

Part 1 – Policy

1.1 Key Principles of this Policy

- People who participate in sport do so for the enjoyment and sense of achievement that it brings. Everyone who participates is entitled to experience a safe and supportive environment.
- The welfare and safety of those participating in any activities organised by, or in association with, HSP is paramount.
- All people have the right to protection from abuse and the right to be treated with dignity, irrespective of their age, gender status, culture, disability, language, racial origin, ethnicity religious belief, marital status and/or sexual orientation.
- We recognise that ability and disability can change over time and that some adults may be additionally at risk of abuse, for example those who have a dependency on others or have different communication needs.
- We recognise that an adult with a disability may or may not identify themselves or be identified as an adult 'at risk'.
- Partners can expect that all suspicions and allegations of abuse or poor practice will be taken seriously by HSP and responded to swiftly and appropriately.
- HSP recognises the role and responsibilities of other agencies and partners in safeguarding adults and is committed to complying with their procedures where relevant and applicable.
- Confidentiality will be upheld in line with data protection legislation, including the Data Protection Act 2018, the Human Rights Act 2000 and the Freedom of Information Act (2004)
- All staff shall have recourse against any allegation made against them and be supported if they report a concern.
- This policy will be promoted to all relevant parties and be freely available from the HSP website.
- This policy and its procedures are mandatory for staff and volunteers.

1.2 The Principles of Adult Safeguarding

The Care Act sets out the following principles that should underpin safeguarding of adults:

Empowerment	Person led decisions and informed consent.
Protection	Support and representation for those in greatest need.
Prevention	Better to take action before harm occurs.
Proportionality	Proportionate and least intrusive response.
Partnership	Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
Accountability	Accountability and transparency in delivering safeguarding.

1.3 Guidance and Legislation

The practices and procedures within this policy are based on the principles contained within the UK's legislation and Government guidance and has been developed to complement the Safeguarding Adults Boards policy and procedures. It takes the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 2018

1.4 Policy Statement

HSP believe that all people have the right to take part in sport and related physical activities free from harm and abuse.

This policy and the related procedures will be reviewed on an annual basis, or earlier in response to any significant changes to the organisation's structure, role or to relevant legislation.

1.5 Review

The HSP Safeguarding policies and associated procedures will be reviewed annually, or if there is an incident and intermediate review as a result of the learning from this, or if there is a change in legislation/government guidance which requires an intermediate review.

The HSP Safeguarding Implementation Plan will also be reviewed on an annual basis at the start of each financial year. The review will be signed-off by the HSP Board. The review will include, but not be limited to:

- Ensuring that documentation reflects the organisation's role, current legislation and government guidance.
- Progress made against the targets within the Implementation Plan.
- Compliance with the recruitment, induction and training processes.
- Currency of any relevant training and DBS checks required.
- Examination of reported and recorded cases.
- Efficiency of communication about the policy to all partners and staff.

1.6 Roles and Responsibilities

1.6.1 General Responsibilities of HSP

HSP is committed to safeguarding and promoting the welfare of all people whilst they are engaged in any activity provided by, or through, the Partnership. We will endeavour to do this by:

- Leading on the production, implementation, monitoring and review of this policy and the accompanying procedures.
- Ensuring that all staff are clear in their role related to safeguarding and promoting welfare.
- Ensuring that all staff are appropriately selected, trained and supervised

- Ensuring that the inclusion of adequate safeguarding arrangements is a key element of all commissioning, funding or partnership agreements.
- Providing help and guidance to partners regarding safeguarding in sport issues.

1.6.2 Role and Responsibilities of the HSP Board

The Board, as the strategic steering body for HSP, will:

- Ensure that safeguarding remains a central principle of the operations and development of the organisation.
- Have strategic accountability for the development of policies for safeguarding and promoting the welfare of adults in sport.
- Have strategic accountability for effective implementation of organisational safeguarding policies and procedures, including those related to safe recruitment.
- Represent the organisation's approach to safeguarding adults and communicate this approach to other organisations, as appropriate.
- Maintain a Board Safeguarding Champion who will liaise between Board and the Lead Designated Safeguarding Officer.

1.6.3 Role and Responsibilities of the Senior Leadership Team

The Senior Leadership Team will:

- Oversee arrangements to ensure the organisation fulfils its duty of care towards adults in line with this policy document.
- Contribute to the development and implementation of policies for the safeguarding and protection of adults in sport.
- Develop, maintain and review other organisational policies and procedures which contribute to safeguarding, including those related to safer recruitment, complaints and disciplinary procedures.
- Work collaboratively with external agencies on cases of poor practice or abuse.
- Ensure partner organisations have adequate safeguarding policies and procedures in respect to safeguarding.
- Ensure that the inclusion of adequate safeguarding arrangements is a key element of all commissioning, funding and partnership agreements.
- Represent the organisation's approach to safeguarding and communicate this approach to other organisations, as appropriate.

- Ensure that resources are available to support the delivery of the safeguarding action plan and to embed safeguarding within the organisation.

1.6.4 Role and Responsibilities of the Designated Safeguarding Officer

HSP will maintain both a Lead and a Deputy Designated Safeguarding Officer (DSO). The DSOs will:

- Lead the development and implementation of HSP's approach to safeguarding adults.
- Provide a point of contact for and respond to any communications and/or concerns regarding safeguarding.
- Work with partners to maintain, develop and review policies and procedures for safeguard adults, in line with national guidance.
- Advise staff and volunteers on implementation of the HSP safeguarding policies and procedures.
- Advise on the development and implementation of staff and volunteer training.
- Implement reporting procedures and maintain relevant records in line with organisational procedure, maintaining confidentiality as appropriate.
- Represent the organisation's approach to safeguarding and protecting adults.
- Provide advice and support on safeguarding arrangements as a key part of all commissioning, funding and partnership agreements.
- Co-ordinate dissemination of policy, procedures and resources as appropriate.
- Provide advice and support to lead safeguarding officers within partner organisations in the county.
- Signpost individuals to sources of support during and following an incident, allegation or complaint.

1.6.5 Role and Responsibilities of Staff and Volunteers

All staff and volunteers will:

- Be aware of what is meant by safeguarding adults.
- Be alert to the risks which individual abusers, or potential abusers may pose, particularly in relation to sport.

- Demonstrate awareness of HSP policies and procedures and how to apply these in practice.
- Report all concerns in line with the organisation's procedures.
- Ensure that safeguarding procedures are a key element of commissioning, funding and partnership agreements, where these are relevant.
- Represent the organisation's approach to safeguarding and protecting adults and communicate this approach to partners.

1.6.6 Role and Responsibilities of the Board Safeguarding Champion

The HSP Board will nominate a member to be HSP's Board Safeguarding Champion. The Board Champion will:

- Support the Lead Safeguarding Officer and/or Deputy Safeguarding Officer(s) in their promotion and delivery of the HSP Annual Safeguarding Implementation Plan.
- Receive regular reports from the Lead Designated Safeguarding Officer on the progress of the Implementation Plan and check and challenge where appropriate.
- Present to the Board on any appropriate safeguarding information (provided by DSO).
- Ensure that safeguarding is included as a standing agenda item at every Board meeting.
- Ensure that the Board takes safeguarding issues into consideration when making decisions.
- Help ensure all Board members are up to date with relevant safeguarding training.

1.7 The Herts Sport & Physical Activity Partnership Designated Safeguarding Officers

HSP has an appointed individual who is responsible for dealing with any safeguarding concerns. In their absence, a deputy will always be available for anyone to consult with.

The Named Persons for safeguarding concerns within HSP are:

Designated Safeguarding Officer	Louise Gallagher-Smith
Work telephone number	01707 284229
Work email	l.gallagher-smith@herts.ac.uk
Deputy Designated Safeguarding Officer	John O'Callaghan
Work email	j.d.ocallaghan@herts.ac.uk

1.8 Key Contacts

Other key contacts for safeguarding adults are:

Adult Social Care: to report a concern about an adult in Hertfordshire	0300 123 4042 (24 hours a day)
Police: if there is a danger to life, a risk of injury or a crime is taking place	999
Ann Craft Trust: the leading authority for safeguarding adults in sport	0115 951 5400
Hourglass: aiming to prevent the abuse of older people	0808 808 8141 (UK helpline)

Part 2 – Procedures

2.1 Recruitment, Deployment and Training of Staff and Volunteers

Introduction

It is vital that all reasonable steps are taken to prevent unsuitable people from working with anyone who is at risk of abuse.

2.1.1 Staff Recruitment

Recruitment procedures for HSP staff will fall in-line with the [UH Recruitment and Selection Policy](#) and include:

- For eligible and/or required posts, an appropriate level Disclosure and Barring Service (DBS) check. If these are not completed before employment commences then a risk assessment will be undertaken, and the necessary safeguards put in place. *
- A risk assessment undertaken on any positive disclosure or reference information.
- Two confidential references should be obtained, once permanent contracts are confirmed, including last employer, and questions asked regarding suitability to work with at-risk groups
- References MUST be taken up and confirmed through direct contact e.g. Telephone.
- Personal identification should be requested e.g. valid passport or driving license with photo.

Recruitment adverts should reference the organisation's commitment to safeguarding and state requirement for DBS checking and references, if appropriate.

*For information regarding Criminal Records Bureau/Disclosure and Barring Service checks: www.gov.uk/government/organisations/disclosure-and-barring-service

2.1.2 Pre-employment Interview

Potential employees will be required to undertake an interview carried out to acceptable protocol and recommendations of UH and HSP, including:

- A check that the application form has been completed in full, including sections on criminal records and self-disclosures. Any gaps or inconsistencies in employment history should be identified
- Any relevant qualifications should be substantiated
- The job requirements and responsibilities should be clarified to the candidate.

2.1.3 Induction and Training

It should be clearly recognised that pre-employment checks are only a part of the process. It is important that the recruitment and selection process is followed by a needs analysis as part of the induction process and then provision of appropriate training.

All staff will undergo an induction process a part of which will familiarise them with safeguarding policies, associated procedures and their specific responsibilities.

All staff are to be provided with opportunities to learn about how to recognise and respond to safeguarding concerns. Assistance will be provided to ensure that individuals can access appropriate basic awareness courses.

HSP Designated Safeguarding Officers will attend relevant training and networks for Active Partnership safeguarding leads identified by Sport England, the CPSU, Ann Craft Trust, plus any other relevant safeguarding adults training deemed required and appropriate.

All members of staff whose role specifically requires working with adults will also be provided with relevant training. This training will then need to be renewed at least every two years.

Specific training will be provided through UH for those responsible for dealing with complaints and disciplinary processes in relation to safeguarding and inappropriate behaviour.

Training and/or written guidance on safer recruitment practice will be provided for those responsible for recruiting, selecting and deploying staff and volunteers. Training should also include guidance and help for staff and volunteers to recognise additional vulnerability of some people based around:

- Race
- Gender
- Age
- Religion
- Disability
- Sexual orientation
- Social background
- Culture
- Mental Health

2.1.4 Code of Conduct

HSP have developed an internal [Code of Conduct](#), which all staff must adhere to. The Code of Conduct is issued to all staff on appointment.

2.1.5 Monitoring and Review

A record will be kept of relevant staff training and required DBS checks etc. This will be reviewed as part of the safeguarding annual review.

Any safeguarding training needs or DBS checks identified to require updating will be reported to the staff members line manager for implementation.

2.2 Recognition of Abuse and Poor Practice

Introduction

Even for those experienced in working with abuse it is still not always easy to recognise a situation where abuse may be occurring. Staff and volunteers working within sporting activities or events are not expected to be experts at recognising abuse. They do, however, still have a responsibility to report any concerns about the safety and welfare of other people, or about any individuals who may pose a threat.

Poor practice is a term often used to describe behaviour that fails to follow codes of conduct, ethics, or sometimes common sense. Often, this may not be a deliberate action and/or constitute abuse as such, but it is still an issue that needs to be addressed as it could have a detrimental effect on another person. Concerns about poor practice should be reported in the same way as abuse.

Staff with designated responsibilities in relation to safeguarding will have a written job description for that role. They will be provided with relevant training to enable them to develop the necessary skills and knowledge to recognise abuse and poor practice and have regular opportunities to update their knowledge and understanding.

2.2.1 Abuse

Abuse refers to the use or treatment of something (person, item, substance, concept, idea, or vocabulary) that is harmful. It can be classed by target or type of abuse.

Abuse is a serious term and often conjures up images of physical harm and physical evidence like bruising, cuts, abrasions, fractures etc. But harm can be

caused in many different, often quite subtle ways e.g.:

- Using stereotypes and degrading language.
- Using overfamiliar or inappropriate terms.
- Undermining someone's confidence.
- Ignoring their wishes.
- Poking fun at the conditions some people live with.
- Treating people by their condition and not as individuals living with a condition.
- Restricting an individual's liberty or choices.
- Making decisions for someone without their knowledge/permission.

Individuals may be abused by the infliction of harm or the failure of action to prevent harm. Abuse can occur within the family, community or an institutional setting. Abuse can also take place through various communication mediums. Victims of abuse are more commonly abused by people they know. The abuser can be an adult or a child and can occur within any social group. Victims of abuse frequently suffer more than one category of abuse.

2.2.2 Types of Abuse and Neglect – Definitions from the Care Act 2014

- **Self-neglect** – this covers a wide range of behaviour. Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. This could be an individual whose appearance becomes unkempt, does not wear suitable attire and demonstrates deterioration in hygiene.
- **Modern Slavery** – encompasses slavery, human trafficking, forced-labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. E.g. it may be noticed that an individual has been missing from attendance and is not responding to communications where they could reasonably be expected to.
- **Domestic Abuse** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. A power imbalance may be noticed between a participant and a family member. For example, a participant with Downs syndrome may be looking quiet and withdrawn when a family member comes to collect them from sessions, in contrast to their personal assistant whom they

greet with a smile.

- **Discriminatory** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act. E.g. this could be the harassing of a club member because they are, or are perceived to be, transgender.
- **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Physical Abuse** – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. This could be a coach intentionally striking an athlete.
- **Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. Example: A fellow athlete who sends unwanted sexually explicit text messages to a learning-disabled adult they are training alongside.
- **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Example: someone taking the possessions of another person who suffers from dementia.
- **Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Example: athletes deprived of adequate clothing or access to water.
- **Emotional or Psychological Abuse** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or

withdrawal from services or supportivenetworks. This could be an athlete threatening another athlete with physical harm and persistently blaming them for poor performance.

Not included in the Care Act 2014 but also relevant:

- **Cyber Bullying** – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it. Cyber-bullying can constitute the criminal offense of harassment.
- **Forced Marriage** – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.
- **Mate Crime** – a 'mate crime' as defined by the Safety Net Project is, 'When at risk people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and it often happens in private.
- **Radicalisation** – the aim of those engaged in radicalisation is to attract people to their reasoning, embed extreme views and often to persuade at risk individuals of the legitimacy of a cause. This may be direct through a personal relationship or through use of social media.
- **Home Invasion (Cuckooing)** – cuckooing involves criminals taking control of another person's home in order to use it for criminal activity. This criminal activity could involve offences relating to drugs, sexual abuse, and weapons. Criminals might also use the property to store money or stolen goods, or simply as a place to sleep.

2.2.3 Signs and Indicators of Abuse and Neglect

Abuse can take place in any context and by all manner of perpetrators. Organisers, club members, workers, volunteers or coaches may suspect that an

individual is being abused or neglected outside of a club or group setting. There are many signs and indicators that may suggest abuse or neglect, these may include:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- Self-harm.
- Fear of a particular group or individual.
- Disclosure – i.e. informing another person

2.3 Responding to Concerns

Introduction

It is not the responsibility of those working or volunteering in sport to individually decide whether abuse or poor practice is occurring. However, wherever there is a genuine concern, it should be treated seriously and acted upon.

The extremely sensitive nature of issues regarding abuse should be understood by all, along with the need for appropriate confidentiality.

Concerns about possible abuse can arise through:

- a direct **disclosure** of poor practice/abuse
- an **allegation** of poor practice/abuse by a third party
- a **suspicion** that poor practice/abuse may have taken place based on other signs or indicators.

If an individual indicates that they may be being abused, or information / observations made give rise to concerns, the response should be immediate. The procedures which have been developed to deal with allegations of suspicions about abuse are based on the fundamental principle that the welfare of all participants is paramount. (See flowchart located in Appendix One for dealing with concerns).

2.3.1 General Response

Immediate action should be taken if concerns arise about the safety and welfare

of any individuals. In incidents of disclosure the person receiving the information should:

- React calmly and do not try to resolve the issue themselves.
- Listen carefully to all the information that is disclosed.
- Where appropriate, ask open questions to establish clarity of what is being said whilst taking great care not to ask leading questions and not pry into intimate details, ensuring the discloser does not feel they are being interrogated.
- Ensure the safety of the person – if they need immediate medical treatment, call an ambulance; If there is immediate danger then call the police.
- Outline where confidentiality can or cannot be provided. The victim may not wish the information to be passed-on further. However, other people may also be at risk unless the situation is dealt with appropriately. As long as it does not increase the risk to the individual, you should explain to them that it is your duty to share your concern with appropriate people i.e. safeguarding or welfare lead.

2.3.2 HSP Staff Response to a Disclosure, Complaint or Concern

Any staff member who receives a disclosure, complaint, or concern should report to the HSP Designated Safeguarding Officer (DSO) or Deputy DSO as soon as possible:

The DSO will take action to forward the details to the relevant professional body.

If the DSO or Deputy cannot be contacted and there is immediate concern, contact should be made directly with Hertfordshire Adult Social Care (Section 1.8), or where immediate risk of harm is suspected, contact the Police.

The next steps are as follows:

- A reporting form should be completed either alongside the DSO or passed to the DSO as soon as possible.
- The DSO will contact the appropriate parties or professional bodies (Police, Social Care, LADO Service, sport's Governing Body).
- The DSO will record the details of the response.
- Where a report has been made, written or verbal, to a professional body, the DSO will follow-up to confirm that the information has been received (record this).
- Where advice is given to a third party to contact statutory services, the DSO should also follow-up to confirm what action has been taken by the third party.

2.3.3 Confidentiality and Storage of Information

Any confidential information must be stored securely. Confidentiality should be maintained for all concerned and access limited to designated people, in accordance with the 2018 Data Protection Act and GDPR. Information should only be passed-on on a need-to-know basis. The people designated to receive information are:

- HSP Designated Safeguarding Officers.
- Appropriate social care personnel.
- The Police.
- The person making the allegation.
- The alleged abuser (and parents if the alleged abuser is a child)*.

*Seek professional advice on who should approach the alleged abuser.

2.3.4 Making Safeguarding Personal

Safeguarding must take into account the individual choices and requirements of everyone involved and follow the “Nothing about me without me” principles. What this means in practice is that adults should be sufficiently involved in the safeguarding process. Their views, wishes, feelings and beliefs must be taken into account when decisions are made.

2.3.5 Capacity and Consent

The issue of capacity on decision making is a key in safeguarding adults. You should not discriminate or make assumptions about someone’s ability to make decisions, and you should not pre-empt a best-interest’s decision merely on the basis of a person’s age, appearance, condition, or behaviour.

However, some people are only able to make some decisions, and a small number of people cannot make any decisions. Being unable to make a decision is called “lacking capacity”.

When an adult has capacity, their consent to safeguarding interventions should be sought. If an adult lacks capacity, decisions should be made in their best interests, and the least restrictive option should be chosen.

2.3.6 Responding to Suspicions about Staff

Staff, for this purpose, includes anyone working on behalf of HSP in a paid or voluntary capacity.

Having reviewed the situation, the DSO will discuss with the Deputy DSO (and if required with statutory agencies) and will make a decision as to whether the matter should be referred for external investigation to Social Services, or if the incident can be dealt with internally e.g. a failure to observe good practice. The DSO should avoid making a decision alone.

2.3.7 Responding to Allegations against Staff

The following steps should be followed when an allegation is made against a HSP member of staff:

- Concerns should be reported to the DSO and an Incident Report Form completed.
- Any allegation which may be related to a staff member **must** be reported immediately by the DSO to the UH Human Resources Business Partner and the Partnership Director. (Note: If the allegation also concerns a child or young person then the DSO will also notify the Local Authority Designated Officer (LADO).
- Where the concern is about an individual who is a volunteer and not an UH employee, the DSO should refer to the Social Services.
- The staff member may need to be suspended from work whilst the matter is investigated according to the existing [disciplinary procedures](#) operated by UH. Any action will be taken in consultation with statutory agencies. Where this is deemed necessary, consideration should be given as to whether the accused is permitted to access potentially incriminating evidence, or devices which may contain this.
- Suspension will not be automatic, and the decision will consider the relevant circumstances and advice from statutory agencies.
- The reinstatement of an individual will follow procedures operated by UH and HSP following the conclusion of any investigations (both internal and external) and an assessment of all available relevant information.

2.3.8 Support for the Reporter of Suspected Abuse

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

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

Details of disciplinary and grievance procedures are available through UH Human Resources. [UH Policies and Regulations](#), including the UH [Staff Disciplinary Policy](#), [Staff Grievance Procedures](#), [Whistleblowing Policy](#) are available on the UH website.

2.3.9 Types of Investigation

When there is a complaint of abuse or poor practice against a member of staff or volunteer, the following types of investigation may occur:

- Criminal; Police
- Safeguarding; Social Services/Police
- Internal; HSP, UH

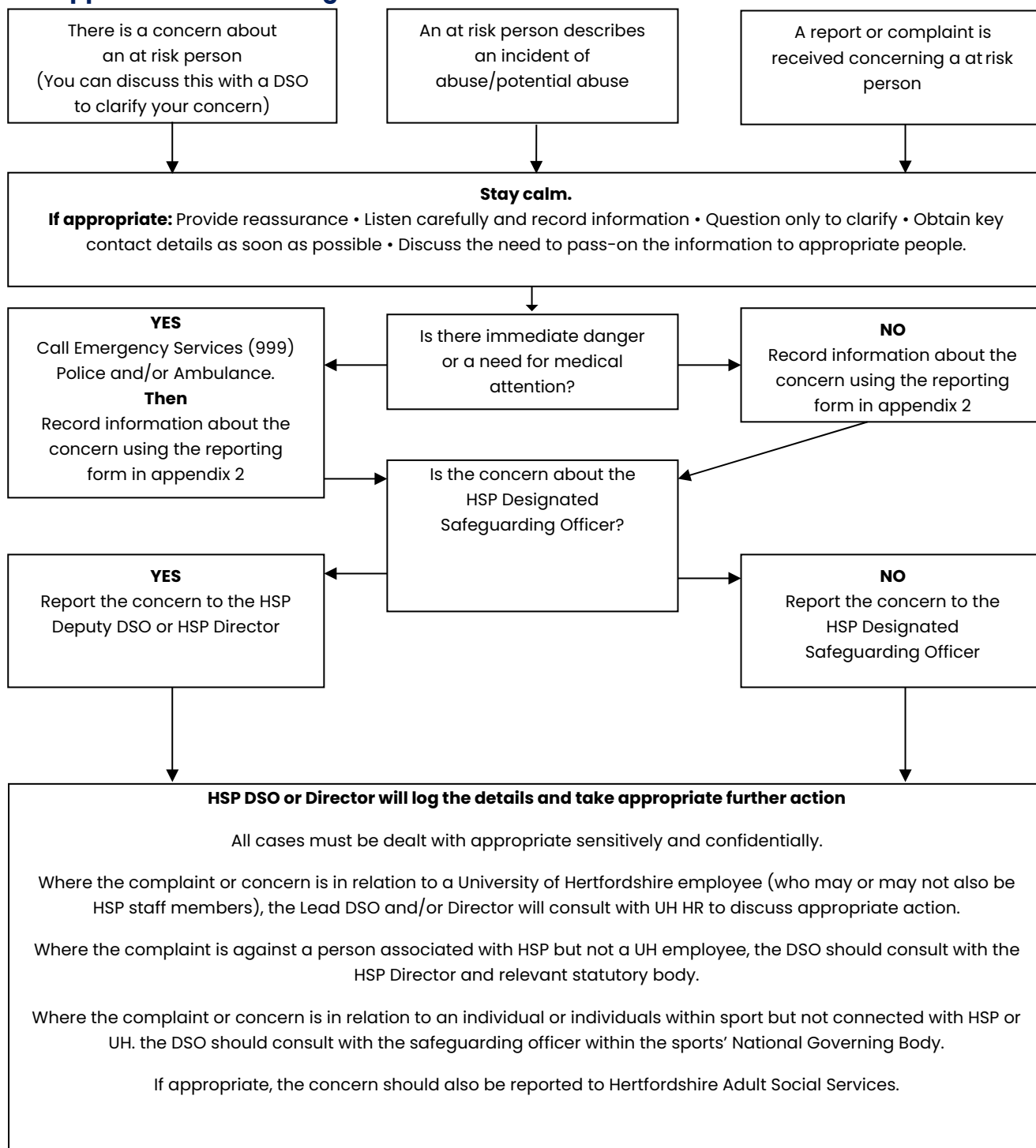
It is also a possibility that civil proceedings could be initiated by the alleged victim, by an advocate, or indeed the person who has been accused.

2.3.10 Allegations of Previous Abuse

There are situations that may arise where an allegation of abuse is made some time after the event has happened, this may be months or on occasion even years after. Where an allegation such as this is made, the allegation should still be investigated because other people could potentially be at risk. Procedures for investigation will remain the same.

Appendices

Appendix One – Dealing with Concerns and Disclosure for HSP Staff



Remember to involve the adult at risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity

Appendix Two – Reporting Form

Caller/reporter's details:	
Name (<i>even if just first name</i>)	
Contact number	
Relationship to person(s) at risk	
Person(s) at risks details:	
Name	
Address	
Contact number	
Are they aware of your concern?	
Person suspected of committing the poor practice or abuse:	
Name	
Address/Location	
Relationship to person(s) at risk	
Are they aware of your concern?	
Details of concerns/incident:	
Questions to ask/paraphrase – <i>What has happened?</i> <i>Why are you concerned?</i> <i>When did this happen?</i> <i>Where?</i>	
Involving the person(s) at risk	
What action does the person you have a concern about want taken? – <i>If appropriate, involve and record the person's views and wishes for what they would like to happen.</i>	
Has anyone else been informed?	(who?):

Time of call/report:	Date of call/report:	Taken by:
----------------------	----------------------	-----------

Appendix Three – University of Hertfordshire Policies

As the Herts Sport & Physical Activity Partnership is hosted by the University of Hertfordshire, all staff working for the Partnership are employed by the University of Hertfordshire. As such, Herts Sport & Physical Activity Partnership staff must comply with the University's organisational policies.

The University of Hertfordshire was created an independent Higher Education Corporation in 1989 under the terms of the Education Reform Act (1989). The institution achieved University status in 1992 under the provisions of the Further and Higher Education Act (1992).

The University operates in accordance with the terms of its Instrument and Articles of Government, as approved by the Privy Council. These determine the overarching governance framework within which the University functions and require it to establish a Board of Governors and Academic Board.

Access to all the University of Hertfordshire policies can be found on the Universities website: www.herts.ac.uk/about-us/governance/university-policies-and-regulations-uprs/uprs

The Universities policies most relevant to Safeguarding Adults can be accessed below:

- [Anti-Bribery and Corruption](#)
- [Bullying and Harassment](#)
- [Complaints Policy \(non-staff\)](#)
- [Data Protection Policy and Privacy Statement](#)
- [Equality and Diversity Policy](#)
- [IT and Computing Regulations](#)
- [Safeguarding Policy](#)
- [Staff Disciplinary Policy](#)
- [Staff Grievance Procedures](#)
- [Whistleblowing Policy](#)



The Herts Sport & Physical Activity Partnership, Hertfordshire Sports Village, de Havilland Campus, University of Hertfordshire, Hatfield, AL10 9EU

www.sportinherts.org.uk

Version 1.3 – May 2025