WESTERN SAFEGUARDING POLICY AND PROCEDURES

VERSION 1.5 – JANUARY 2023

- Addition of contents page
- New reporting a concern flowcharts to bring in line with new LTA procedures
- Added responsibility for safeguarding within the venue
- Added details on recruitment and training
- Changed the code of conduct to Standards of Practice and Behaviour to refer to the LTA code of conduct in disciplinary code
- Added details on the definition of position of trust and that the law changed in 2022
- Added information about factors which increase vulnerability to abuse
- Added low level concerns definition and procedure
- Added requirements on confidentiality
- Added section on information sharing and retention of safeguarding related information
- Added section on mental capacity (adults at risk)
- Added section on making safeguarding personal (adults at risk)
- Added section on consent requirements for adults at risk
- Updated section on legislation
- Addition of support services

WESTERN SAFEGUARDING POLICY AND PROCEDURES

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Policy Owner:

Policy approved by:
Date Policy approved:
Next review Date:

POLICY STATEMENT AND SCOPE

Western recognises our moral and statutory responsibility to safeguard and promote the welfare of all children (anyone under 18) and adults at risk. We are committed to ensuring our safeguarding practice reflects statutory responsibilities, government guidance and with LTA safeguarding standards, which can be found here: https://www.lta.org.uk/about-us/safeguarding/venue-standards/.

We are committed to prioritising the well-being of children and adults at risk and providing a safe and welcoming environment where they are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children and adults at risk receive effective support and protection.

We recognise that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

We recognise that there is a legal framework within which sport needs to work to safeguard adults at risk and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by us will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

This policy applies to any person who plays, coaches, officiates, works, volunteers, or otherwise participates (or visits) at our venue.

We expect contractors and partner organisations, including for example, suppliers and sponsors to adopt and demonstrate their commitment to the principles and practice as set out in this Policy and associated procedures.

All bound by this policy are responsible for upholding high standards of conduct and professionalism and raising safeguarding concerns and allegations in accordance with the Reporting a Safeguarding Concern Procedures.

Stuart Clarke [President	Susan Gibson Smith Welfare Officer

POLICY PRINCIPLES

- The safety and welfare of children and adults at risk is paramount

- All children and adults at risk, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Safeguarding is everybody's responsibility
- All safeguarding concerns or allegations will be taken seriously and responded to swiftly and appropriately
- We strive to create a culture and environment where everyone is empowered to protect themselves and others and feel able to raise concerns
- We actively promote working together to ensure all children and adults at risk are safeguarded

RESPONSIBILITY FOR SAFEGUARDING

The Committee have overall accountability for this policy and its implementation.

We have an appointed Welfare Officer (WO) who holds operational responsibility for safeguarding in line with the LTA role profile and is supported by the CommitteeThe WO is the first point of contact to raise a safeguarding concern involving a child or adult at risk. They also play a proactive role in increasing an awareness of safeguarding within our venue.

The Welfare Officer is:
Susan Gibson Smith
07561 462578
susangs@doctors.org.uk

If the Welfare Officer is not available to report a safeguarding concern or allegation to, the alternative contact within our venue is: *[note: you should have an alternative contact who concerns can be raised to – this can either be a deputy Welfare Officer with DBS and training, or it could be another person on the committee who acts as a point of contact for occasions when the Welfare Officer is away, e.g. on holiday, sick, etc).*
Ian Campbell
07977 007777
ian@glasgowwestern.co.uk

The LTA Safeguarding Team has strategic and operational responsibility for safeguarding in tennis in Britain, including the monitoring and evaluation of safeguarding standards and investigating safeguarding concerns. Safeguarding concerns can be raised directly to the LTA Safeguarding Team via https://safeguardingconcern.lta.org.uk/

The Local Authority contact details are:
Children Services 0800 1111
Adult Services 0141 287 0555

All bound by this policy are responsible for raising safeguarding concerns in accordance with the 'Reporting a safeguarding concern' procedure (see Appendix A and B).

POLICY AIMS

The purpose of this policy is to:

- Protect children (including children of adults who use our services) and adults at risk from harm
- Provide the necessary information to enable people to meet their safeguarding responsibilities
- Deliver good practice and high safeguarding standards
- Outline our commitment to safeguarding children and adults at risk

DEFINITIONS

Child: anyone under the age of 18.

Parent: birth parents and other adults who are in a parenting role.

Adult at risk:

England (Care Act 2014)	**Scotland (Adult Support and Protection Act 2007)**	**Wales (Social Services and Well Being Act 2014)**
An individual aged 18 years and over who: (a) has needs for care and support (whether or not the local authority is meeting any of those needs) and; (b) is experiencing, or at risk of, abuse or neglect, and; (c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.	An individual aged 16 years and over who: a) is unable to safeguard their own well-being, property, rights or other interests, b) is at risk of harm, and because they are affected by disability, mental disorder, illness or physical or mental infirmity, is more vulnerable to being harmed than adults who are not so affected.	An individual aged 18 years and over who: a) is experiencing or is at risk of abuse or neglect, and; b) has needs for care and support (whether or not the authority is meeting any of those needs) and; c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

RECRUITMENT

We operate a Safe Recruitment Policy and are committed to ensuring that people who work (including volunteers and self-employed individuals who we engage) with children or adults at risk are appropriately qualified for that role. This means that, where necessary, they will be required to undergo Criminal Records Checks through the Disclosure and Barring Service (DBS) in England and Wales, the Protection Vulnerable Groups (PVG) Scheme for those in Scotland, or the equivalent Overseas Criminal Records Check in their country of origin before being allowed to work.

TRAINING

All LTA Accredited Coaches and Welfare Officers complete safeguarding training as part of their role and renew this as part of their Accreditation requirements or every three years. The Committee also receive safeguarding training (every three years or when there are changes to the Committee) provided to them via the Welfare Officer to enable them to recognise the possible signs and indicators of abuse and what to do if they have a safeguarding concern or allegation.

An induction, which includes our safeguarding policies and procedures, reporting and recording arrangements, and details for the Welfare Officer, is also provided to all new staff, volunteers, coaches and any self-employed individuals who we engage.

CODE OF CONDUCT

All individuals within scope of this policy are expected to familiarise themselves with this policy and the LTA Code of Conduct (available here: https://www.lta.org.uk/about-us/what-we-do/governance-and-structure/rules-regulations/), and at all times act in accordance with them. Breaches of the law, this Policy and/or the LTA Code of Conduct may result in criminal and/or disciplinary action being taken

TRANSPORTATION

It is the responsibility of parents to ensure appropriate transport arrangements are in place for their children when travelling to and from the venue. Similarly, it is the responsibility of the adult at risk (or their carer) to ensure transport arrangements are in place.

Coaches and other staff/volunteers are not responsible for transporting children or adults at risk to and from the venue or other locations (except if it is an emergency), unless it is as part of a venue organised trip in which case the following measures will be in place

- The adult at risk or child's parents are informed of the destination, reason for the journey and who the driver will be
- The adult at risk or child's parents return a completed consent form and the driver will have a copy of this and emergency contact details during the journey
- There will be two adults in the front of the car, irrespective of the number of children or adults at risk being transported.
- Children or adults at risk are always seated in the back of the vehicle
- If there is a mixture of female and male children or adults at risk, we will seek to have adults of matching gender where possible
- There is an established procedure in the event of a breakdown/emergency.
- The driver has a valid UK driving license, DBS/PVG, correct insurance, MOT certificate and complies with laws on the use of seatbelts and restraints

SUPERVISING CHILDREN

Children under the age of 13 are required to have parental supervision whilst at our venue and not participating in any venue sessions, such as coaching lessons or tennis camps.

For coaching activities, we comply with the LTA guidance on coach-to-player ratios. For children aged under 13 children must be delivered directly into the care of the coach by the parent and picked up directly from the coach. Please note that it is not enough to drop off outside or at the front door of the venue. Parents must ensure that their child has been delivered to the coach. Children under the stipulated age will not be allowed to leave a coaching session or camp unattended unless permission has been given in writing.

For other activities, e.g. away trips/matches, we will use the following adult-to-child ratios:

- 2:8 for children 10 and under

- 2:10 for children aged 11 and over

We may decide to have a greater adult-to-child ratio dependent on the needs of the children or identified risks. At least one of the supervising adults will, where possible, be the same gender as the children. Situations where a child has to leave a venue session, for example, to use the toilet, will also be supervised.

POSITIONS OF TRUST

A person aged 18 or older who holds a position of authority or responsibility over a child or adult at risk is in a position of trust. Positions of trust are not defined by a qualification or job title, but by reference to the activity which the adult is carrying out in relation to the child or adult at risk, namely, coaching, teaching, training, supervising or instructing (including as a volunteer) on a regular basis. People who are in a position of trust must be aware of the power imbalance they hold over children and adults at risk and not use this for personal advantage or gratification.

In June 2022, the Sexual Offences Act 2003 was changed to extend the abuse of position of trust offences to include where an adult is coaching, teaching, training, supervising or instructing a child under 18 years old within sport or religious settings. This means that under the Sexual Offences Act 2003, in England and Wales it is a criminal offence for a person in a position of trust to have a sexual or intimate relationship with a child under 18 years old, even if the relationship is deemed consensual. Therefore, any sexual activity (including online activity) between someone in a position of trust and a child under 18 years old will be formally reported as it may be a criminal offence.

TYPES OF ABUSE

There are four main types of abuse that apply to children, these being:

- Sexual
- Physical
- Emotional
- Neglect

The safeguarding adults at risk legislation in each home nation defines categories of adult abuse and harm as follows.

England (Care Act 2014)	Wales (Social Services and Well Being Act 2014)	Scotland (Adult Support and Protection Act 2007)
Physical Sexual Emotional/Psychological/Mental Neglect Financial or material abuse Discriminatory Organisational Self-neglect Domestic Abuse (including coercive control)	Physical Sexual Psychological Neglect Financial	Physical Psychological Financial Sexual Neglect

Modern slavery		

Detailed descriptions of these types of abuse, along with other forms of harm, can be found in (Appendix C).

INCREASED VULNERABILITY TO ABUSE

Vulnerability is a changeable and contextual state but may include children and adults at risk with a physical disability or diagnosed condition such as dementia, learning difficulties, or those who have a mental health condition such as severe anxiety or depression. Children and adults in these groups may:

- Have smaller network of friends and peer group to support and protect
- Require intimate/physical and or invasive medical care required which can allow abuse to be hidden
- Have communication difficulties
- Be less able to resist either verbally or physically
- Be dependent on the abuser for a service or basic need
- Have medical conditions that are used to explain injuries

Personal circumstances away from tennis such as domestic violence, poverty, substance abuse, homelessness and social exclusion may also have an impact on vulnerability. In addition, children and adults at risk from LGBTQ+ and/or Black, Asian and Other Minority Ethnic groups can:

- Be subjected to bullying, emotional abuse and physical abuse due to their sexual orientation or gender identity
- Experience racism and racist attitudes
- Engage in cultural practices, which are classed as abuse within the UK (e.g., honour-based violence, female genital mutilation)
- Expect to be ignored by people in authority due to experience of institutionalised racism
- Be afraid of further abuse or racist abuse if they challenge others
- Be subjected to myths based on racial stereotyping
- Be using or learning English as a second language and therefore find it more difficult to communicate

Elite athletes may also be more vulnerable to abuse because they may:

- Have increased dependency on coaching and other support staff for funding, selection and progression
- Be segregated from protective factors such as their family and peer groups
- Feel less able to report concerning behaviour due to a fear of impacting their sporting development
- Be exposed to unhealthy cultures and competitive performance ideologies, where inappropriate practices may be accepted or even encouraged under the belief they deliver success
- Be subjected to intense training and pressure to play/succeed even when injured and achieve unrealistic image, body and weight expectations

LOW LEVEL CONCERNS

A low level concern (which can also be known as poor practice) is behaviour that falls short of abuse towards a child and does not meet the allegation threshold or a referral to the Local Authority Designated Officer (LADO, England and Wales only), but which nevertheless harms or places a child at risk of harm or has a negative effect on the safety and well-being of children.

An 'allegation' means that it is alleged that a person who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for possession of a weapon
- Have, as a parent or carer, become subject to child protection procedures

A low level concern is any concern - no matter how small, and even if no more than a 'nagging doubt' - that an adult may have acted in a manner which:

- Is not consistent with the Code of Conduct, and/or
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children

Low level concerns are not acceptable and should be reported to the Venue Welfare Officer who will refer the matter on to the LTA Safeguarding Team. It is critical that all low level concerns are referred to the LTA. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

Upon receipt by the LTA, low level concerns will be triaged and managed through the LTA Safeguarding Regulations, which form part of the LTA Disciplinary Code available here: https://www.lta.org.uk/about-us/what-we-do/governance-and-structure/rules-regulations/.

The LTA may decide that the low level concern is suitable to be dealt with by the venue directly, in which case the LTA will support them with managing the situation. If further information comes to light which raises the level of concern, the matter must be referred to the LTA.

RESPONDING TO A SAFEGUARDING CONCERN OR ALLEGATION

Everyone has a responsibility to ensure the safety and welfare of children and adults at risk and to take appropriate steps to ensure that safeguarding concerns and allegations are taken seriously and responded to quickly and appropriately, even if the safeguarding concern or allegation may not have occurred recently.

It is advisable to discuss safeguarding concerns or allegations with the adult at risk, or the child's parents in the first instance except where this may place the adult at risk, a child, or someone else, at increased risk.

It is not the responsibility of anyone within the venue to investigate any safeguarding concern or allegation, nor determine whether abuse has taken place. All concerns must be responded to in accordance with the Reporting a Safeguarding Concern Procedure.

Once a safeguarding concern or allegation is reported to our Welfare Officer, it will be passed onto the LTA Safeguarding Team who will triage and manage it through the LTA Safeguarding Regulations, which form part of the LTA Disciplinary Code available here: https://www.lta.org.uk/about-us/what-we-do/governance-and-structure/rules-regulations/.

RESPONDING TO A DISCLOSURE OF ABUSE

If a child or adult at risk discloses that he or she has been abused or is at risk of abuse:

- Listen carefully and calmly to what is said
- Reassure them that they have done the right thing and what they have told you is very important
- Keep questions to a minimum, only ask questions if you need to identify/ clarify what the person is telling you
- Ask them what they would like to happen next
- Explain what you would like to do next
- Ask for their consent for the information to be shared (adults only)
- Let them know that you will need to speak to the Welfare Officer/LTA Safeguarding Team because it is in their best interest. If you intend to speak to the police or social care, you should let them know this too.
- Do not seek to investigate it yourself or let doubt/personal bias prevent you from reporting the allegation
- Make an arrangement as to how you can contact them safely (adults only)
- Help them to contact other organisations for advice and support (e.g. Police, Domestic Abuse helpline, Victim Support, etc)
- Ensure that their immediate needs are met and that the priority is their safety and protection from further risk of harm
- Record details of the disclosure (further advice here) as soon as possible (but not during the disclosure) and then submit the details to the LTA via https://safeguardingconcern.lta.org.uk/

MAKING SAFEGUARDING PERSONAL

Legislation recognises that adults make choices that may mean that one part of their well-being suffers at the expense of another. Similarly, adults can also make a decision to risk their personal safety, for example to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

The concept of 'well-being' is threaded throughout UK legislation and is part of the Law about how health and social care is provided. Our well-being includes our mental and physical health, our relationships, our connection with our communities and our contribution to society.

'Making Safeguarding Personal' means engaging an adult at risk in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Their views, wishes, feelings and beliefs will be taken into account when decisions are made about how to support them to be safe and finding the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If an adult at risk has difficulty making their views and wishes known, they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

Being able to live free from abuse and neglect is a key element of well-being. Any actions taken to safeguard an adult must take their whole well-being into account and be proportionate to the risk of harm.

MENTAL CAPACITY

It is important to make sure an adult at risk has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened, however, in some situations the adult may not have the mental capacity to understand the choice or to tell us their views.

If we are concerned that an adult at risk who has a lot of difficulty making their own decisions is being abused or neglected, we will need to refer the situation to the Local Authority, and this should result in health or social care professionals making an assessment of mental capacity and/or getting the person the support they need to make decisions.

We will always seek to obtain the consent from an adult at risk before sharing information about them with others, however there are some circumstances where we will need to act without their consent and these include where:

- it is not safe to contact them to gain their consent – i.e. it might put them or the person making contact at further risk
- we believe they or someone else is at risk, including children
- we believe the adult at risk is being coerced or is under duress
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed
- the adult at risk does not have mental capacity to consent to information being shared about them
- the person causing harm has care and support needs
- the concerns are about an adult at risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

When information is shared without the consent of the adult at risk this will be explained to them, when it is safe to do so, and any further actions should still fully include them

CONFIDENTIALITY

All safeguarding concerns and allegations will be dealt with confidentiality by the Welfare Officer on a need to know basis, not only to maintain the privacy of the individuals involved but also to ensure that evidence or any investigation is not compromised. All people involved in a safeguarding concern or allegation should similarly ensure they maintain high levels of confidentiality.

There may be circumstances where an individual raising a safeguarding concern or allegation does not wish to be named. It is not possible to assure anonymity, as in some circumstances individuals

will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process).

INFORMATION SHARING AND RETENTION

We share safeguarding information with the LTA in accordance with this policy and LTA regulations. In certain situations, we may be required to also share information with statutory agencies and other relevant organisations where it is considered necessary and proportionate to prevent or manage the risk of harm in tennis or sport to children.

We follow the UK Government's Information Sharing Advice for Safeguarding Practitioners which describes the '7 Golden Rules' of information sharing:

- Remember that the Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Further details of the above guidance: https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice.

When sharing safeguarding information, we will keep a dated record of:

- what has been shared;
- with whom; and
- for what purpose.

This should include, where applicable, a record of any steps taken to secure, protect or minimise personal data, any express limitations placed on the onward use of the information, and a record of the basis for sharing.

Where safeguarding information is concerned, we operate in line with best practice which is for long term (e.g. lifetime) retention of relevant documentation.

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:

- your or another organisation doesn't have clear safeguarding procedures to follow
- concerns aren't dealt with properly or may be covered up
- a concern that was raised hasn't been acted upon
- you are worried that repercussions are likely to arise if you raise a concern.

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

Safecall is an independent, confidential and, if required, anonymous reporting service provided by the LTA if there are serious concerns regarding any of the public interest areas below:

- 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

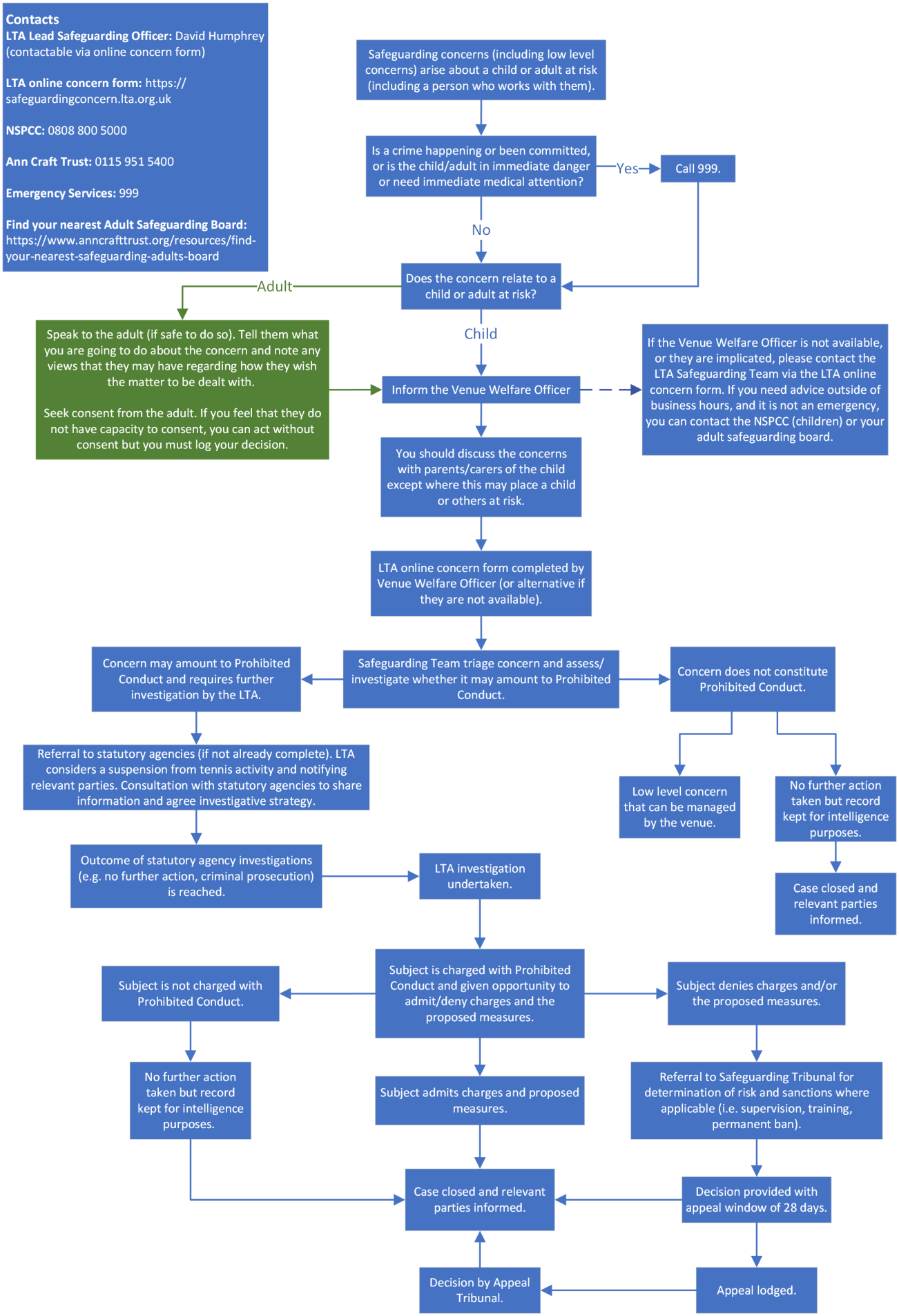
If a Whistleblower feels that it is not appropriate to contact the LTA Safeguarding Team on the grounds of one of the above areas, they can contact Safecall via telephone on 0800 915 1571. Calls are not recorded. Alternatively, a report can be made online: www.safecall.co.uk/report

RELATED POLICIES AND PROCEDURES

This policy should be read alongside our other policies and procedures, including:

- Anti-Bullying
- Code of conduct
- Diversity and inclusion
- Online safety and communication
- Photography and filming
- Use of changing rooms
- Safeguarding at events, activities and competitions
- Safe recruitment

APPENDIX A: REPORTING A SAFEGUARDING CONCERN THAT OCCURS WITHIN TENNIS



APPENDIX B: REPORTING A SAFEGUARDING CONCERN THAT HAPPENS OUTSIDE OF TENNIS

Contacts
LTA Lead Safeguarding Officer: David Humphrey (contactable via online concern form)

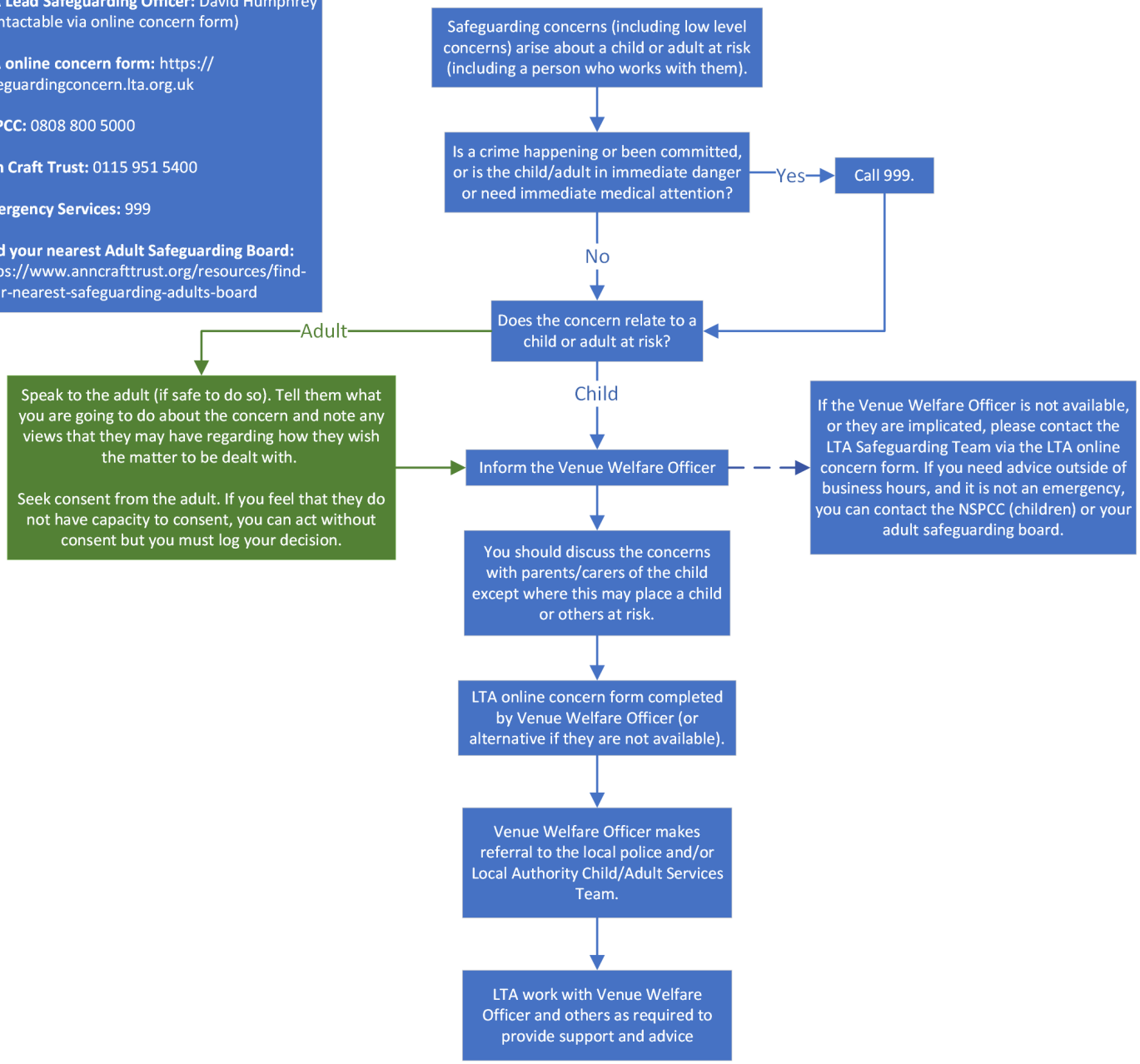
LTA online concern form: https://safeguardingconcern.lta.org.uk

NSPCC: 0808 800 5000

Ann Craft Trust: 0115 951 5400

Emergency Services: 999

Find your nearest Adult Safeguarding Board: https://www.anncrafttrust.org/resources/find-your-nearest-safeguarding-adults-board



APPENDIX C: DEFINITIONS

Adult: a person aged 18 years or older

Child: a person under the age of 18 years.

Parent: birth parents and other adults who are in a parenting role.

Adult at risk:
In England, an individual aged 18 years and over who:
(a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND;
(b) is experiencing, or at risk of, abuse or neglect, AND;
(c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

In Scotland, an individual aged 16 years and over who:
a) is unable to safeguard their own well-being, property, rights or other interests,
b) is at risk of harm, AND;
c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, is more vulnerable to being harmed than adults who are not so affected.

In Wales, an individual aged 18 years and over who:
a) is experiencing or is at risk of abuse or neglect, AND;
b) has needs for care and support (whether or not the authority is meeting any of those needs) AND;
c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk

Safeguarding: the action taken to promote the welfare of children and protect them from harm. This means protecting children from abuse and maltreatment, preventing harm to their health or development, ensuring they grow up with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect.

Child protection: the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.

Local Authority Designated Officer (LADO): an individual within a local authority in England and Wales with responsibility for oversight of allegations against people who work with children.

Prohibited conduct: engage, or attempt or threaten to engage, in conduct that directly or indirectly harms the physical and/or mental welfare and/or safety of one or more child or adult at risk; or pose a risk of harm to the physical and/or mental welfare and/or safety of one or more child or adult at risk.

Abuse: Abuse happens when a person harms a child or an adult at risk. An abuser can be:
- family members

- friends
- people working or volunteering in organisational or community settings
- people they know
- strangers

Indicators of abuse: There are many signs and indicators that may suggest a child or adult at risk is being abused or neglected. The NSPCC and Ann Craft Trust have comprehensive lists of the types of abuse and their indicators at: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/ and https://www.anncrafttrust.org/resources/types-of-harm/. Examples of signs and symptoms include but are not limited to:

- Unexplained change in behaviour
- Unexplained bruises or injuries
- Missing belongings or money
- Child is not attending / no longer enjoying their sessions
- Changes in weight
- Truancy
- Sexually explicit knowledge or behaviour
- Being withdrawn
- Genital pain, stomach pains, discomfort, pregnancy, incontinence, urinary infections, STDs.
- Dirty, ill-fitting clothes or a lack of appropriate clothing for the weather
- Self-harm.
- A fear of a particular group of people or individual.
- Lack of friends
- Lack or growth or development
- Low self-esteem

Neglect:
Children - Ongoing failure to meet the basic needs of children. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

Adults at risk - includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

Emotional abuse: Any act or other treatment which is persistent and may cause emotional damage and undermine a child's sense of wellbeing. This includes persistent criticism, denigration or putting unrealistic expectations on children, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Emotional/Psychological abuse (adults at risk): Includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

Physical abuse:
Children - Physical abuse happens when a child is deliberately hurt, causing physical harm. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse

if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).

Adults at risk - Hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Sexual abuse:
Children - Any act which involves forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the child's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped.

Adults at risk - Includes 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.

Grooming: The process of developing a relationship with and the trust of a child, their family, and any other adults around the child, to commit sexual abuse or exploitation against them. Grooming can happen both online and in person.

Child sexual exploitation: A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

Self-neglect (adults at risk): Covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.

Modern Slavery (adults at risk): Encompasses slavery, human trafficking, forced labour, and domestic servitude.

Domestic Abuse (adults at risk): Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship,

regardless of gender or sexuality. It can include physical, sexual, psychological, emotional or financial abuse.

Exposure to domestic abuse is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

Discriminatory (adults at risk): Abuse or bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

Organisational (adults at risk): Includes 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. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation

Financial (adults at risk): Includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.

Harmful sexual behaviour (HSB): HSB is developmentally inappropriate sexual behaviour which is displayed by children and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour.

HSB encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children who display it, as well as the people it is directed towards.

HSB can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- sexual activity with other children or adults

Sexual behaviour between children is considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled

Bullying: Repeated behaviour intended to intimidate or upset a child and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another child.

Child trafficking: Child trafficking involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. Children may be trafficked for child sexual exploitation, benefit fraud, forced marriage, domestic servitude, forced labour, criminal exploitation and more.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using children. Gangs recruit children through deception, intimidation, violence, debt bondage and/or grooming. County line gangs pose a significant threat to children upon whom they rely to conduct and/or facilitate such criminality.

Female genital mutilation: Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a child is new-born, during childhood or adolescence, just before marriage or during pregnancy. There are no medical reasons to carry out FGM.

Hazing: Rituals, initiation activities, actions or situations that occur with or without consent, which recklessly, intentionally or unintentionally endanger the physical or emotional well-being of vulnerable groups.

Honour-Based Violence: Honour-Based Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

Infatuations: Children may develop an infatuation with a person who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. People who work with children should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against them. These people should therefore ensure that their own behaviour is above reproach. Situations where a child is infatuated should be raised at the earliest opportunity with the Welfare Officer and LTA Safeguarding Team.

Peer-on-peer abuse: Children can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and nonintimate).

Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children for the purposes of involvement in extremist activity is a serious safeguarding issue.

APPENDIX D: LEGISLATION, GUIDANCE AND REGULATIONS

Our approach to safeguarding is based on the principles recognised within UK legislation as well as LTA and Government guidance, which includes:

Age of Legal Capacity Act 1991 (Scotland)	Keeping Children Safe in Education 2022
Care Act 2014	Police Act 1997
Children Act 1989	Protection from Abuse Act 2001 (Scotland)
Children Act 1995 (Scotland)	Protection of Children Act 1999
Children Act 2004	Protection of Children and Prevention of Sexual Offences Act 2005 (Scotland)
Children (Equal Protection from Assault) Act 2019 (Scotland)	Protection of Freedoms Act 2012
Children and Social Work Act 2017	Protection of Vulnerable Groups Act 2007 (Scotland)
Children and Young People Act 2014 (Scotland)	Rehabilitation of Offenders Act 1974
Commissioner for Children and Young People Act 2003 (Scotland)	Safeguarding Vulnerable Groups Act 2006
Criminal Procedure Act 1995 (Scotland)	Sexual Offences (Amendments) Act 2000
Data Protection Act 1998	Sexual Offences Act 2009 (Scotland)
Disclosure Act 2020 (Scotland)	Sexual Offences Act 2003
Equalities Act 2010	Social Services and Wellbeing Act 2014 (Wales)
European Convention on Human Rights 1950	The Age of Criminal Responsibility Act 2019 (Scotland)
General Data Protection Regulations 2018	United Nations Convention on the Rights of the Child 1989
Getting It Right For Every Child (GIRFEC) (Scotland)	Wales Safeguarding Procedures
Human Rights Act 1998	Working Together to Safeguard Children 2018 (revised 2020)
Information Sharing Advice for Safeguarding Practitioners 2018	

Each home nation also has legislation about the circumstances in which decisions can be made on behalf of an adult at risk who is unable to make decisions for themselves:

- England and Wales - Mental Capacity Act 2005
- Scotland - Adults with Incapacity Act 2000
- There are specific offences applying to the mistreatment of and sexual offences against adults who do not have Mental Capacity and specific offences where mistreatment is carried out by a person who is employed as a carer: e.g. wilful neglect and wilful mistreatment.

APPENDIX E: ADDITIONAL INFORMATION AND SUPPORT

Alcoholics Anonymous
Free helpline for alcohol issues.
0800 9177 650
help@aamail.org
www.alcoholicsanonymous.org.uk

Anger Management
British Association of Anger Management (BAAM)
0845 130 0286
www.angermanage.co.uk

Beat
Provides support on all aspects of eating disorders.
0808 801 0677 (over 18s)
help@beateatingdisorders.org.uk

Bipolar UK
Support to enable people affected by bipolar disorder/ manic depression to take control of their lives.
0333 323 3880
info@bipolaruk.org
www.bipolaruk.org.uk

ChildLine
ChildLine help anyone under 19 in the UK with any issue they are going through.
08001111 or you can email or live chat at: https://www.childline.org.uk/about/about-childline/

Galop
Emotional and practical support for LGBT people experiencing domestic violence.
0800 999 5428
help@galop.org.uk

Men's Advice Line
Information, support and advice to men experiencing domestic violence, offered by Respect.
0808 801 0327
info@mensadviceline.org.uk

Mind
Information, advice, guidance and support for people with mental health problems.
0300 123 3393
info@mind.org.uk

National Domestic Violence Helpline
Run in partnership between Women's Aid & Refuge.
0808 2000 247

NAPAC

The National Association for People Abused in Childhood (NAPAC) offers support to adult survivors of all types of childhood abuse.
0808 801 0331
https://napac.org.uk/

NSPCC
The NSPCC can support with any concerns about a child's safety or wellbeing.
help@nspcc.org.uk
0808 800 5000

One in four
Specialising in working with survivors of childhood sexual abuse and sexual violence. Offers long-term 1-1 therapy.
0208 697 2112
admin@oneinfour.org.uk
www.oneinfour.org.uk

Relate
Counselling and relationship education for couples. Live chat line service also available.
0300 100 1234
www.relate.org.uk

Samaritans
Call 116 123 for free - Whatever you're going through, a Samaritan will face it with you.
www.samaritans.org

Sane
Deals with all aspects of mental illness including depression, schizophrenia and anxiety.
0845 767 8000
www.sane.org.uk

The Survivors Trust
The Survivors Trust is the largest umbrella agency for specialist rape and sexual abuse services in the UK
01788 550554
www.thesurvivorstrust.org

Talk to Frank
National organisation providing advice regarding drugs and substance abuse. On-line live chat service also available.
0300 123 6600
www.talktofrank.com

WESTERN ANTI BULLYING POLICY

VERSION 1.1 – JANUARY 2023

- Addition of section on Purpose and Scope
- Change of terminology from club to venue
- Amendments to wording including:
    - Promoting code of conduct and safe recruitment
    - Requirements around reporting bullying incidents
    - Ensuring children are aware of helpline numbers
    - Informing parents of anti-bullying policy
- Useful contacts updated.

ANTI-BULLYING POLICY

PURPOSE AND SCOPE

Western strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

Bullying is defined as a range of abusive behaviour that is repeated and intended to hurt someone either physically or emotionally.

This document sets out how to help prevent bullying from happening to all children and adults at risk. It also sets out how to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need. It also provides information to all staff, volunteers, children and their families about what should be done to prevent and deal with bullying.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with [name of venue/county].

WE RECOGNISE THAT

- Bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm
- All children and adults at risk, 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
- Everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to bullying.

WE WILL SEEK TO KEEP CHILDREN AND ADULTS AT RISK SAFE BY

- Recognising that bullying is closely related to how we respect and recognise the value of diversity.
- Recognising our duty of care and responsibility towards safeguarding
- Promoting and implement this anti-bullying policy in addition to our safeguarding policy and procedures
- Ensuring that bullying behaviour is not tolerated or condoned
- Taking action to respond and deal with any reports of bullying towards children
- Encouraging and facilitating children to play a part in developing and adopting appropriate behaviours
- Promoting a code of conduct for behaviour
- Employing safe recruitment practices
- Making sure our response to incidents of bullying takes into account:
    - the needs of the person being bullied
    - the needs of the person displaying bullying behaviour
    - the needs of others who may be affected
    - our [venue/county] as a whole

PLAYERS, PARENTS, COACHES, VOLUNTEERS AND OTHER MEMBERS OF STAFF WILL:

- Encourage individuals to speak out about bullying behaviour and report incidents of bullying behaviour they see to the Welfare Officer
- Respect every child's need for, and right to, a play environment where safety, security, praise, recognition and opportunity for taking responsibility are available
- Respect the feelings and views of others, even if you don't agree with them
- Recognise that everyone is important and equal, and that our differences make each of us special and worthy of being valued
- Show appreciation of others by acknowledging individual qualities, contributions and progress
- Ensure safety by having rules and practices carefully explained and displayed for all to see
- Report incidents of bullying behaviour they see or hear about

SUPPORTING CHILDREN

- We'll let children know who will listen to and support them
- We'll create an "open door" ethos where children feel confident to talk to an adult about bullying behaviour or any other issue that affects them
- Potential barriers to talking (including those associated with a child's disability or impairment) will be acknowledged and addressed at the outset to enable children to speak out
- We'll make sure children are aware of helpline numbers
- Anyone who reports an incident of bullying will be listened to carefully and reports will be taken seriously
- Any reported experience of bullying behaviour will be investigated and will involve listening carefully to all those involved
- Children experiencing bullying behaviour will be supported and helped to uphold their right to play and live in a safe environment
- Those who display bullying behaviour will be supported and encouraged to develop better relationships
- We'll make sure that any sanctions are proportionate and fair

SUPPORT TO THE PARENTS/CARERS

- Parents will be advised on the anti-bullying policy and practice
- Any experience of bullying behaviour will be discussed with the child's parents or carers
- Parents will be consulted on action to be taken (for both victim and bully)
- Information and advice on coping with bullying will be made available
- Support will be offered to parents, including information from other agencies or support lines

RELATED POLICIES AND PROCEDURES

This policy should be read alongside our Western policies and procedures, including:

- Code of conduct
- Diversity and inclusion
- Online safety and communication
- Photography and filming
- Use of changing rooms
- Safeguarding policy
- Safeguarding at events, activities and competitions

- Safe recruitment

USEFUL CONTACTS

NSPCC Helpline 0808 800 5000
Childline 0800 1111 / www.childline.org.uk
Kidscape www.kidscape.org.uk

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chairperson - Stuart Clarke - President
Date:2/3/25

Welfare Officer [Susan Gibson Smith]: Date:2/3/25

WESTERN USE OF CHANGING FACILITIES POLICY

VERSION 1.1 – JANUARY 2023

- Updates to briefing section for added clarification around variances in venues and facilities

USE OF CHANGING FACILITIES BRIEFING AND WESTERN POLICY

BRIEFING

This document is intended to allow venues to meet the needs of its members, taking into account the facilities that are available to them, the number of people accessing them and the activities they are undertaking.

Whilst changing facilities in venues vary greatly, venues are required to have a policy on the use of changing facilities (unless they have no changing facilities at all). This template may not be suitable or practical for some venues due to their nature (e.g. public access, multi-sport venues, etc) in which case this template can be used as a starting point alongside the CPSU changing rooms guidance (https://thecpsu.org.uk/resource-library/best-practice/safe-use-of-changing-facilities/) to develop a policy that meets their needs.

Venues who find it difficult to adhere to some of the procedures in this document and CPSU guidance, or do not have changing facilities at all, may consider that it is more practical for players to come to the venue already changed, wearing suitably warm clothing e.g. tracksuits, and go home afterwards to change and shower.

WESTERN POLICY ON THE USE OF CHANGING ROOMS

Western strives to ensure that all children (anyone under 18) are safeguarded from abuse and have an enjoyable tennis experience.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with [name of venue/county].

This document sets out the Western policy for the acceptable use of our changing rooms.

1. Groups of children will have sole use of changing rooms. This reduces any risks and potential vulnerability associated with mixing adults and children when changing and showering.

2. If adults and children need to share our changing rooms, they will do so at different times.

3. Where it is unavoidable that changing rooms are used by both adults and children at the same time, there will be access to separate changing, showering and toilet areas.

4. Under no circumstances will adult staff, coaches or volunteers change or shower at the same time as children using the changing rooms.

5. Mixed gender groups of children will have access to separate changing rooms, or use the same changing room but at different times.

6. If we are made aware that a child or adult self-identifies as a gender that differs from the gender they were assigned at birth, we will work with them and their parents/carers (where it relates to a child) to make reasonable adjustments to changing arrangements to suit their

needs (*n.b. for more information on this please go to https://thecpsu.org.uk/help-advice/topics/lgbt-young-people-and-sport/*)

7. Mobile phones and other electronic devices must not be used in changing rooms.

8. For younger groups of children, a DBS checked member of staff or volunteer will wait outside the changing rooms to allow children to call for assistance if required.

9. Where no changing facilities are available children, parents and travelling teams/players will be made aware prior to the game and advised to make alternative arrangements and to take appropriate additional clothing e.g. tracksuits etc.

WESTERN ONLINE SAFETY AND COMMUNICATION POLICY

VERSION 1.1 – JANUARY 2023

- Addition of purpose and scope
- General wording amendments for improved clarity
- Update to include references to video conferencing
- Incorporated information on 1-1 communication from the “interim guidelines for remote communication” document (no longer available)

ONLINE SAFETY AND COMMUNICATION POLICY

PURPOSE AND SCOPE

Western strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

This document sets out how the Western uses the internet and social media, and the procedures for doing so. It also outlines expectations for online behaviour and communication with children.

The principles in this policy apply no matter which current or future technology is used.

The purpose of this policy is to:

- Protect children involved with our organisation and who make use of technology (such as mobile phones, tablets, games consoles and the internet).
- Provide staff, coaches and volunteers with policy and procedure information regarding online safety and inform them how to respond to incidents
- Ensure our organisation operates within the law regarding how we behave online

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with Western

WE RECOGNISE THAT

- the online world provides everyone with many opportunities; however, it can also present risks and challenges
- we have a duty to ensure that all children and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children safe online, whether or not they are using Western'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, and other organisations is essential in helping them to be responsible in their approach to online safety

WE WILL SEEK TO KEEP CHILDREN SAFE BY

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

MANAGING OUR ONLINE PRESENCE

Our online presence through our 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 a designated person, who will have been appointed by the committee
- the designated person managing our online presence will seek advice from our Welfare Officer / County Safeguarding Officer and the LTA to advise 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)
- account, page and event settings will be set to 'private' so that only those invited can see their content
- social media pages/groups (e.g. Facebook pages/groups) used to communicate with children must be an organization, community or sports group and not personal
- 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
- we'll make sure children are aware of who manages our social media accounts and who to contact if they have any concerns about the running of the account
- parents will be asked to give their consent for us to communicate with their children through social media, via video conferencing platforms or by any other means of communication
- parents will need to give consent for photographs or videos of their child to be posted on social media
- all of our accounts and email addresses will be appropriate, fit for purpose and only used for venue/county specific activities
- video conferencing sessions will be password protected to maintain children's privacy and prevent exposure to inappropriate or harmful content by third parties

WHAT WE EXPECT OF STAFF, COACHES AND VOLUNTEERS

- they should be aware of this policy and behave in accordance with it
- they should seek the advice from our Welfare Officer / County Safeguarding Officer and the LTA if they have any concerns about the use of the internet or social media
- any messages they wish to send out to children must be sent through the designated person responsible for the organisation's online presence
- they must 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 organisation accounts
- they must make sure any content posted is accurate and appropriate
- they must not communicate with children via personal accounts or private messages
- they must communicate with parents through email or in writing, or use an organisational account, profile or website rather than via personal social media accounts
- they must copy in parents or at least one other member of staff, coach or volunteer should to any communications sent to children
- they must avoid communication with children beyond dedicated event or activity timings , unless it is necessary for professional purposes (i.e. emergencies, whilst on a trip, etc.) and contacting the parents is not possible

- they must sign off any communication in a professional manner, avoiding the use of emojis or symbols such as kisses ("X's")
- they will respond to any concerns reported through social media in the same way as a face-to-face disclosure, in accordance with our safeguarding policy
- they must not engage in sexting, or send pictures or messages that are abusive, obscene, inappropriate, indecent, or menacing to anyone
- they must ensure any 1-2-1 sessions with children involve the parents/carers being able to supervise their child, or alternatively, that another coach/member of staff is present. This supervision would not necessarily require the parents to be in the same room, as long as they are able to check in on the session

WHAT WE EXPECT OF CHILDREN

- they should be aware of this policy
- they will sign and adhere to the acceptable use statement for internet and social media use
- they will behave responsibly online and refrain from any bullying or abusive behaviour

WHAT WE EXPECT OF PARENTS/CARERS

- they should be aware of this policy and behave in accordance with it
- they should seek the advice from our Welfare Officer] and the LTA if they have any concerns about the use of the internet or social media
- they should communicate with staff, coaches and volunteers in a professional and appropriate manner
- they must not engage in sexting, or send pictures or messages that are abusive, obscene, inappropriate, indecent or menacing to anyone
- they will ensure their children understand and sign the acceptable use statement for internet and social media use on all devices

USING MOBILE PHONES OR OTHER DEVICES TO COMMUNICATE

When using mobile phone or other devices to communicate, we 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 for the parents into the message, we will seek parental consent to do this or include a second practitioner
- In some circumstances it may be necessary for staff, coaches and volunteers to message children directly for logistical reasons and it is impractical to text the parents, for example cancelling or rescheduling the lesson.
- Where this type of 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, such as reminders about lesson times, meeting points etc.
- If staff, coaches and volunteers only have one mobile phone, and it is not possible to have a second business phone, they will ensure the parents and 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 manner (for example, their personal life), the member of staff, coach or volunteer will:

- end the conversation or not reply
- inform the Welfare Officer / County Safeguarding Officer as soon as possible and arrange to address the matter with the child and their parents appropriately
- if the conversation raises safeguarding concerns, notify the LTA as soon as possible

USING MOBILE PHONES/DEVICES DURING ACTIVITIES

So that all children can enjoy and actively take part in tennis activities, we discourage the use of mobile phones/devices. As part of this policy, we will:

- make children aware of how and who to contact if there is an emergency or a change to previously agreed arrangements
- inform parents of appropriate times they can contact children who are away on trips
- advise parents that it may not be possible to contact children during activities and provide a contact within the venue or organisation who will be reachable should there be an emergency
- explain to children how using mobile phones during activities has an impact on their safe awareness of their environment, and their level of participation and achievement

SITUATIONS REQUIRING ONE-TO-ONE COMMUNICATION

Some roles are directly positioned to support a child's well-being and are therefore delivered in one-to-one environments (upon receiving written parental consent). These roles are usually members of the well-being group (Performance Lifestyle Advisors, Sport Psychologists, Clinical Psychologist, Medical Doctor) and collectively have the expertise to support any concerns raised to player or staff well-being.

Practitioners in this group may at times be required to maintain confidentiality in regards to well-being support. This confidentiality may also extend to certain follow up communication, e.g. emails which relate to what was discussed in the session. This means that it may not necessarily be appropriate to include parents or other practitioners in the sessions or related communications.

In some circumstances, practitioners who are not in the well-being group may need to communicate with a child directly. These situations should be limited to logistical or pastoral reasons. For example, to let the child know they are running late, to cancel or reschedule a session, or whilst on a trip it is necessary to call the player directly.

For all practitioners, where one-to-one communication takes place, an audit trail should be retained. For example, ensuring written communication (e.g. email, text messages, etc) are not deleted and that logs are kept of any telephone/video call.

RELATED POLICIES AND PROCEDURES

This policy should be read alongside our Western policies and procedures, including:

- Anti-Bullying
- Code of conduct
- Diversity and inclusion
- Photography and filming
- Use of changing rooms
- Safeguarding policy
- Safeguarding at events, activities and competitions
- Safe recruitment

Further information for parents about keeping children safe online

Keeping children safe online | NSPCC
CEOP Education (thinkuknow.co.uk)
Parents and Carers - UK Safer Internet Centre

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chairperson - Stuart Clarke - President Date: 2/3/25

Welfare Officer – Susan Gibson Smith Date: 2/3/25

WESTERN SAFE RECRUITMENT POLICY

VERSION 1.2 – JANUARY 2023

- Updates to terminology, e.g. club changed to venue
- Amendments to purpose and addition of scope
- Addition of review and sign off section for Chair and Welfare Officer / County Safeguarding Officer

SAFE RECRUITMENT POLICY

PURPOSE AND SCOPE

Western is committed to safeguarding children (anyone under 18) and adults at risk. Western complies with National Safe Recruitment Procedures and relevant legislation to ensure a consistent and thorough recruitment process. Western conducts criminal record checks (such as Disclosure and Barring Service (DBS) checks, Protecting Vulnerable Groups (PVG) scheme checks or similar) on applicable positions as part of this process.

The aim of the Safe Recruitment policy is to help deter people who might abuse children or adults at risk from applying for paid or voluntary roles where they will have access to those vulnerable groups.

Individuals involved in the recruitment and selection of staff, coaches and volunteers are responsible for familiarising themselves with and complying with the provisions of this policy.

This Policy shall be applied consistently in relation to all staff, coaches and volunteers regardless of age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity status, race, religion or belief, sex, or sexual orientation.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with Western

RECRUITMENT PROCESS

If a role involves working with children (anyone under 18) or adults at risk, the role requirements will be carefully reviewed to determine if a DBS check is required.

We will advertise for any vacant positions and any adverts and/or job descriptions will refer to any requirements to complete the appropriate DBS check.

All applicants are required to complete a standard application process to ensure they have all the information they need about our organisation, including the advertised role and to ensure we can assess their suitability for the role. This process will provide us with essential information such as employment history (either paid or voluntary), further education background, academic or vocational qualifications.

During the application process applicants are asked to confidentially self-disclose any unspent criminal offences or child protection investigations. If the role requires an enhanced DBS check, we will also ask applicants to disclose any unprotected spent offences. Where the information raises a safeguarding concern, details will be shared with the LTA Safeguarding Team.

We will take reasonable steps to confirm the applicants' suitability for the role, including; verifying qualifications and professional memberships, assessing skills and relevant experience. All applicants will be asked to provide an explanation for any significant gaps or repeated changes in employment history where no reasons have been provided on their application. We may also ask interview questions which are designed to allow candidates to demonstrate the attitudes and values that people working with children need to have.

Applicants will be asked to provide contact details of people willing to act as a referee during the application process. Referees should include someone who can comment on the applicant's previous work with children (where possible). References are normally sought after a conditional offer of employment or engagement has been made, however there may be occasions when we ask applicants for their consent to contact a referee before an offer of employment or engagement has been made. All conditional offers of employment or engagement are subject satisfactory completion of all vetting processes including references.

Western provides an induction programme for all new staff, coaches and volunteers which includes our safeguarding policies and procedures. As part of the induction process all staff, coaches and volunteers are required to complete an initial probationary period to ensure that their conduct, performance, behaviours and attendance meet the required standards.

DBS CHECKS

Any individual intending to work in Regulated Activity with children, young people or adults are required to complete an Enhanced DBS check and Barred List check before commencement of employment or engagement and at least every 3 years during their employment or engagement.

Regulated activity is work that a barred person must not do. It is defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA) which has been amended by the Protection of Freedoms Act 2012 (PoFA).

Any individual intending to work in a role which involves work with children or adults at risk but is not defined as Regulated Activity will be required to complete an Enhanced DBS check before commencement of employment or engagement and at least every 3 years during their employment or engagement. Western will regularly monitor the specific nature of roles and whether they are defined as Regulated Activity.

All conditional offers of employment or engagement are subject to receipt of a satisfactory DBS check completed through the LTA, and an Overseas Criminal Record check if appropriate.

In order to minimise risk, if a role is not defined as Regulated Activity but requires an Enhanced DBS check and this check takes much longer than anticipated, in exceptional circumstances where a delay in employment or engagement may cause significant operational difficulties the \manager may authorise an individual to commence their work in a supervised capacity. However, this does not apply to roles considered as working in Regulated activity.

If we are not satisfied with the outcome of any of the above checks (DBS check or Overseas Criminal Record check) we may decide to withdraw a conditional offer of employment or engagement. We may also withdraw a conditional offer of employment or engagement if an applicant has failed to co-operate with this process or if the process has not been completed within reasonable timescales.

Staff, coaches and volunteers who begin performing additional duties or a different role that moves them into Regulated Activity will be asked to complete a new Enhanced DBS and Barred List check.

All agency workers and contractors used by Western are required to always comply with the Enhanced DBS and Barred List Check requirements as outlined in this Policy. If new or adverse

information emerges or appropriate checks have not been made by the Agency Western will require the Agency to withdraw the temporary worker immediately. Furthermore Western will consider the implications of these Policy requirements on the provision of service agreements for all contractors, including any additional vetting requirements for those roles engaged in Regulated Activity with children, young people or adults at risk.

DBS CHECKS REVEALING CONTENT

A DBS check will disclose any spent convictions, cautions or reprimands that are not protected and been subject to filtering by the DBS. DBS checks may also disclose other relevant information based on the position applied for.

The LTA will receive a notification when a DBS check has revealed content (i.e. an offence); however, the LTA will not know the details of the content.

When the LTA receives a notification that a DBS check has revealed content, the applicant will be asked to provide the original DBS check for review. The LTA will then review the information to decide if any further information or action is required.

If the DBS is not provided to the LTA for review, Western may withdraw any conditional offer of employment or engagement and take appropriate steps to prevent the individual from working with children and adults at risk.

RELATED POLICIES AND PROCEDURES

This policy should be read alongside our Western policies and procedures, including:

- Anti-Bullying
- Code of conduct
- Diversity and inclusion
- Online safety and communication
- Photography and filming
- Use of changing rooms
- Safeguarding policy
- Safeguarding at events, activities and competitions

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chairperson -Stuart Clarke Date: 2/3/25

Welfare Officer- Susan Gibson Smith Date: 2/3/25

WESTERN PHOTOGRAPHY AND FILMING POLICY

VERSION 1.2 – JANUARY 2023

- Change from guidance to policy
- Addition of purpose and scope
- General wording amendments for improved clarity e.g., referring to photographs/videos rather than just images.
- Update to the section on photography/filming for personal use for added clarity on requirements and procedure

PHOTOGRAPHY AND FILMING POLICY

PURPOSE AND SCOPE

Western strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

The purpose of this policy is to:

- protect children who take part in Western's activities and events, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children during our events and activities
- ensure that we operate in line with our values and within the law when creating, using and sharing photographs/videos of children.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with Western

WE RECOGNISE THAT:

- sharing photographs/videos of our activities can help us celebrate the successes and achievements of our children, provide a record of our activities and raise awareness of our venue/county
- the welfare of the children taking part in our activities is paramount
- children, their parents/carers have a right to decide whether their photograph/video is taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- consent to take photographs/videos of children is only meaningful when children, their parents/carers understand how the photographs/videos will be used and stored, and are fully aware of the potential risks associated with the use and distribution
- there are potential risks associated with sharing photographs/videos of children online.

RISKS OF SHARING PHOTOGRAPHS/VIDEOS ONLINE

Sharing photographs/videos of children on social media or other online platforms carries potential risks. For example:

- children may become vulnerable to grooming if a photograph/video is shared alongside information that makes them identifiable. This includes: personal details; a tag with location information; visual details such as a school/venue uniform
- inappropriate photographs/videos of children may be shared online
- photographs/videos may be copied, downloaded, screenshotted or shared by anyone
- photographs/videos of children may be adapted and used inappropriately
- photographs/videos may appear in internet search results
- depending on the terms and conditions of using an online platform, the photographs/videos may be owned by the platform once it's been posted. Platforms may then license photographs/videos for use by third parties – such as for commercial purposes
- each photograph/video, and any comments on them, become a part of a child's public image.

WE WILL SEEK TO KEEP CHILDREN SAFE BY

- always asking for written consent from a child and their parents/carers before taking and using a child's photograph/video
- always explaining what photographs/videos will be used for, how they will be stored and what potential risks are associated with sharing photographs/videos of children
- if consent is withdrawn, take reasonable steps to remove the photographs/videos of the child from public view. It may not be possible to delete or destroy all photographs/videos that have been disseminated online (such as via social media) or in hard copy.
- only using first names of children, unless:
    - it's considered necessary – such as for elite /high profile child players
    - it's in the child's best interests
    - the child and parent have consented (and been informed how, where, in what context a photograph/video might be used, e.g. public website, or through social media, and are aware of potential risks)
- never publish personal information about children
- making sure children, their parents/carers understand how photographs/videos will be securely stored and for how long (including how we will control access to the photographs/videos and their associated information)
- reducing the risk of photographs/videos being copied and used inappropriately by:
    - only using photographs/videos of children in appropriate clothing
    - avoid photographs/videos and camera angles that may be prone to misinterpretation or misuse
    - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of photographs/videos being misused
- using photographs/videos that positively reflect children's involvement in the activity
- using business devices unless not practical / possible to do so. It is important that where personal devices are to be used, this is justifiable and not simply because that is the way it has always been done
- undertake reasonable spot checks on personal devices to monitor compliance
- setting expectations around consent and the use of any personal devices among staff, volunteers and young players
- if children and parents/carers do not consent to photographs/videos being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer/videographer knows not to take pictures of them. We will not exclude a child from an activity because we do not have consent to photograph/video them.

PHOTOGRAPHY AND/OR FILMING FOR PERSONAL USE

When children, parents/carers or spectators are taking photographs/videos for personal use:

- photographs/videos captured by the parent or carer (or another adult with the express permission of the parent or carer) of the child is permitted
- we will recommend that people check the privacy settings of their social media account to understand who else will be able to view any photographs/videos they share
- we will remind children, parents/carers who they can talk to if they have any concerns about photographs/videos being shared.

For specific events we run, we will publicise what will be allowed before the start of the event.

If a player wishes to enter into a private arrangement with a commercial photographer or videographer, the photographer or videographer must have the express consent of that player (or their parent or legal guardian where the player is under 18 years old) and will notify the venue (including the Competition Organiser/Director for any event) of their attendance in advance.

USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS

If Western engages a photographer/videographer for an event, we will:

- follow a safe recruitment process
- provide the photographer/videographer with a clear brief about appropriate content and behaviour
- ensure the photographer/videographer wears identification at all times
- inform children and parents/carers that a photographer/videographer will be at the event and ensure they give written consent to any close up photographs/videos of their child*
- inform the photographer/videographer about how to identify – and avoid taking photographs/videos of children without the required parental consent
- clarify areas where all photography/filming is prohibited (i.e. toilets, changing areas, first aid areas)
- not allow the photographer/videographer to have unsupervised access to children
- not allow the photographer/videographer to carry out sessions outside the event or at a child's home
- report any concerns regarding inappropriate or intrusive photography/filming.

*At some events, wide-angle and general photographs/videos of the event, the site, award ceremonies, and similar may be taken. It may not be reasonable, practical or proportionate to secure consent for every participating child in order to take such photographs/videos. In these circumstances, we will make clear to all participants and parents that these kinds of photographs/videos will be taken, and for what purposes.

PHOTOGRAPHY AND/OR FILMING FOR WIDER USE

If people such as local journalists or professional photographers wish to operate at an event and share photographs/videos, we will ensure they have been given proper permission in advance and that they have provided us with the following information:

- the name and address of the person using the camera
- the names of children they wish to take photographs/videos of (if possible)
- the reason for taking the photographs/videos and/or what they will be used for
- a signed declaration that the information provided is valid and that the photographs/videos will only be used for the reasons given.

We will verify these details and decide whether to grant permission for the photographs/videos to be taken. We will also ensure the children who are the intended subjects of the photographs/videos and their parents have given consent and inform the photographer of anyone who does not give consent.

We will also inform children and parents/carers that an external photographer is present and ensure they are easily identifiable.

CONCERNS

If we become concerned that someone is taking photographs/videos without the necessary consent, we reserve the right to ask them to delete the photographs/videos and may ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures.

If we become concerned that inappropriate photographs/videos have or are being taken, this will be reported to the Welfare Officer and LTA Safeguarding Team. It may also be necessary to report this to the police.

STORING PHOTOGRAPHS/VIDEOS

We will store photographs/videos of children securely and in accordance with data protection law.

Hard copies of photographs/videos will be kept in a locked drawer and electronic photographs/videos in a protected folder with restricted access. Personal devices will be set so as to not to automatically upload photographs/videos to the cloud.

Photographs/videos of children will not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Photographs/videos will be deleted after use and not repurposed for personal use (e.g. marketing or otherwise);

When obtaining consent for photographs/videos, we will state how long they will be kept for.

Access to photographs/videos will be controlled, i.e. through a password protected folder

Photographs/videos which are deemed to be no longer necessary will be deleted, and in any event, will not be kept longer than consent was given for.

RELATED POLICIES AND PROCEDURES

This policy should be read alongside our Western policies and procedures, including:

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- Online safety and communication
- Use of changing rooms
- Safeguarding policy
- Safeguarding at events, activities and competitions
- Safe recruitment

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chairperson - Stuart Clarke Date: 2/3/25

Welfare Officer - Susan Gibson Smith Date: 2/3/25