

This Safeguarding Policy should be read in conjunction with the primary policies and procedures:

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|---------------------------------------|--|
| 1. Safeguarding Children Policy       | 4. Volunteer Policy                          |
| 2. Safeguarding Adults at Risk Policy | 5. Equality & Diversity Policy and Statement |
| 3. Safer Recruitment Practices Policy | 6. GDPR Policy                               |

## **Terminology**

- *“Abuse” includes all types of abuse to children and adults at risk.*
- *“Concern” refers to disclosures, concerns or allegations.*
- *RDA UK Safeguarding Team refers to the team based at National Office.*

## **1. Managing Concerns and Allegations Statement**

At RDA UK, we firmly believe that safeguarding is everyone’s responsibility. Every individual within the RDA community, regardless of role or position, plays a vital role in creating and maintaining a safe and positive environment. RDA UK encourages an inclusive culture where all individuals understand their duty of care in safeguarding and are empowered to act responsibly.

**If you feel a child is in immediate danger, you should contact the police or medical services.**

**If an adult at risk is in immediate danger, it is good practice, and at Group discretion, to take into consideration the adult’s wants and needs on what they would like to happen, where possible.**

## **2. Purpose**

This policy outlines the procedures and guidance for identifying, reporting and managing safeguarding concerns to ensure the safety and wellbeing of individuals within RDA UK.

## **3. Scope**

This policy applies to all individuals involved with RDA UK, including RDA Groups, Regional Teams, Accessibility Mark Centres, trustees, staff, volunteers, coaches, participants and their parents/guardians/carers. It will be shared on MyRDA and communicated to the RDA network. RDA Groups are responsible for sharing this policy with their volunteers, coaches, participants and their parents/guardians/carers.

## **4. Policy Statements**

### **4.1 Identification of Safeguarding Concerns:**

- All individuals involved with RDA UK should be vigilant in recognising the signs and behaviours which might indicate potential safeguarding concerns.

### **4.2 Reporting Procedures:**

- Any person who becomes aware of, suspects, or has concerns about safeguarding issues must report it immediately to the Group Safeguarding Officer and/or RDA UK Safeguarding Team.
- Reports can be made verbally or in writing, ensuring that all relevant details are provided.

### **4.3 Confidentiality and Handling of Reports:**

- All reports of safeguarding concerns will be handled with the utmost confidentiality and sensitivity.

- Information will only be shared on a need to know basis, and the identity of the reporter will be protected whenever possible, unless required by law or for investigative purposes.
- All reports will be recorded on a central Case Management System, called Globocol.

#### 4.4 Investigation and Response:

- The Group Safeguarding Officer and/or RDA UK Safeguarding Team will conduct a thorough investigation into reported concerns, involving relevant Statutory Agencies as necessary.
- If other Agencies are involved, regular contact will be maintained with appropriate individuals as necessary. Where possible, timescales and follow ups will be agreed.
- Immediate action will be taken to ensure the safety and protection of the individuals involved while the matter is ongoing.
- Support and guidance will be provided to those affected by safeguarding concerns, including direction to support organisations, counselling support and medical services as needed.

#### 4.5 Training and Awareness:

- Regular training sessions and awareness programmes will be conducted to educate staff, volunteers and relevant stakeholders on recognising, reporting and responding to safeguarding concerns. Please refer to the Safer Recruitment Practices Policy.

### 5. Definitions

- **Child Abuse:** Any action that could or does cause significant harm to a child.
- **Categories of Child Abuse:** There are 4 categories of child abuse: physical, sexual, emotional and neglect.
- **Abuse (Adult):** A violation of an individual's human and civil rights by another person.
- **Categories of Adult Abuse:** The Care Act 2014 identifies 10 categories of adult abuse. However, this is not considered an exhaustive list. These categories include: self-neglect, modern slavery, domestic abuse and coercive control, discriminatory abuse, organisation abuse, physical abuse, sexual abuse, financial or material abuse, neglect, or emotion or psychological abuse.
- **Capacity:** 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 (*Mental Capacity Act 2005*).
- **Poor Practice:** Takes place whenever a member of staff, volunteer or coach fail to provide a good standard of care and support, i.e. a breach in the code of conduct.
- **Low Level Concerns:** Concerns that a person has acted in a way that is inconsistent with the code of conduct, including conduct outside of RDA, and doesn't meet the threshold of harm or considered serious enough to refer to the statutory agencies. E.g. being overly friendly with children or shouting/intimidating another person.
- **High Threshold Concerns:** Concerns that are referred to statutory agencies and/or hold a degree of organisation reputational risk. E.g. any concern of sexual abuse.
- **Disclosure:** The process by which a person starts to share their experiences of abuse with others. This can take place over a longer period of time (*NSPCC*).
- **Statutory Agencies:** Include Police, Social Care, LADO, and Local Childrens/Adults Board.

## 6. Recognising Signs of Abuse

### 6.1 Common Indicators of Abuse

Abuse is not always obvious or readily visible. Indicators might include, but are not limited to:

- Disclosures about abuse or questions/comments which lead to that reasoning
- Withdrawal from friends or usual activities
- Changes in an individual's normal behaviour and appetite
- Depression, anxiety or unusual fears
- Sudden loss of self-confidence or becoming withdrawn
- Reluctance to go home or attempts to run away
- Frequent absences from activities or no longer enjoying sessions
- Unexplained or suspicious injuries or injuries with inconsistent explanations
- Attempts at suicide, suicidal tendencies or self-harm
- Rebellious or defiant behaviour
- Someone losing or gaining weight, an unkempt appearance or a deterioration in hygiene
- Person has belongings or money going missing

This is not an exhaustive list and the presence of one or more indicators is not proof that abuse is taking place.

### 6.2 Reasons to Suspect Abuse

A person may become aware of abuse through:

- A disclosure made by a child or adult at risk
- An observation
- Signs or suspicions of abuse
- An allegation made against a member of staff, coach or volunteer
- An allegation made about a parent/guardian/carer
- In response to allegations regarding poor practice or code of conduct breach
- A report from the local statutory agency, etc.

## 7. Responding to Concerns

Responding is the actions taken when you become aware of a concern or have a disclosure made to you. It is crucial that you gain as much factual information and context as possible whilst not influencing any future investigation.

**When responding to a concern, you should:**

- Stay calm – do not show disgust or disbelief.
- Ensure the person is and feels safe, if responding to a disclosure.
- Listen carefully.
- Keep an open mind – do not speculate, make assumptions or make judgements.
- Find a quiet place to have the conversation.
- Keep questions to a minimum whilst the person is talking. Use open-ended questions to find out more information or to clarify points, where possible and necessary.
- Make a written note of what is said to you and read back to the person what has been written down to ensure a clear and accurate understanding has been recorded. It may be appropriate to make notes

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after the conversation. Note: It is crucial to write this account as soon as possible following the discussion to reduce the risk of omitting details.

- Make and agree an immediate plan as to the next action.

You have a duty of care to report all concerns to the Group Safeguarding Officer and/or RDA UK Safeguarding Team.

It is good practice to seek the adult at risk's views on what they would like to happen next and to inform them of the actions you intend to take, always considering their wants and needs.

**Consent:** You should look to gain consent from an adult at risk where possible. However, you do not need consent to discuss a concern with the Group Safeguarding Officer and/or RDA UK Safeguarding Team. Do not let the issue of consent get in the way of seeking advice.

**Disclosures:** Children and adults at risk may not feel prepared or know how to communicate that they are experiencing abuse, exploitation or neglect, or, they might not even realise that what they are going through is harmful. Additionally, they may have been influenced to believe that the abusive behaviour is an expression of care and love from the person causing the harm. It is crucial to allow the person to open up at their own pace, regardless of whether evidence is immediately apparent. This does not mean disregarding the concerns or delaying action, but rather it may involve contacting the local Statutory Agencies promptly. You should explain your concerns to the person making the disclosure and that you have a responsibility to seek assistance and guidance. Keeping detailed records is imperative in these circumstances.

## You should not:

- Panic.
- Make promises or agree to confidentiality.
- Allow expressions of shock or distaste.
- Make negative comments about the alleged incident.
- Ask leading questions. Keep closed questions (which require a 'yes' or 'no' answer) to a minimum.

## You should never:

- Approach any alleged perpetrator to discuss the concern.
- Make promises to the person that cannot be kept, e.g. confidentiality.
- Rush into actions that may be inappropriate.
- Take forward concerns if you have a conflict of interest. Instead pass this to an appropriate person, e.g. Group Chair (if you are the Group Safeguarding Officer) or RDA UK Safeguarding Team.

## 8. Reporting Concerns

### Primary Reporting Structure

1. Concerned Party – the person initially reporting the concern or allegation
2. Group Safeguarding Officer
3. RDA UK Safeguarding Team (at National Office)
4. RDA UK Board of Trustees
5. BEF Safeguarding Team and Case Management Group (CMG)
6. Referrals made to Statutory Agencies (i.e. Police, Social Care, LADO, or Local Childrens/Adults Board)

The following section outlines the reporting policies and procedures for each level.

### 8.1 Initial Concern Raised / Concerned Party

Non-action is not an option.

There are five ways for you to report a concern:

1. To your Group Safeguarding Officer – please find out from your Group who these people are.
2. By contacting the RDA UK Safeguarding Team at E: [safeguarding@rda.org.uk](mailto:safeguarding@rda.org.uk) or Tel: 01926 492915. The phone line will be available during office hours only.
3. To the BEF Safeguarding Team at E: [safeguarding@bef.co.uk](mailto:safeguarding@bef.co.uk) or Tel: 02475 313443.
4. If urgent and you cannot contact your Group, RDA or BEF Safeguarding Teams, you should call the NSPCC 24 hour helpline on 0808 800 5000.
5. If it is an emergency because a person is at immediate risk, then call the Police, Emergency Services or Children’s Social Care Team (Statutory Agencies) in your area, as appropriate.

**Note:** *Contacting Statutory Agencies is priority. You must also inform the Group Safeguarding Officer and/or the RDA UK Safeguarding Team at your earliest convenience.*

If you require guidance your Group Safeguarding Officer and/or the RDA UK Safeguarding Team are available to help. If you cannot contact either official, then please contact the NSPCC Helpline on Tel: 0808 800 5000.

**If you are in any doubt, report your concern.**

**Timeframe:** Concerns should be reported on the day they are raised, in person, by phone or email to the Group Safeguarding Officer.

### 8.2 Group Safeguarding Officer

All safeguarding concerns must be reported to the RDA UK Safeguarding Team by the Group Safeguarding Officer, including those that have been addressed at a local level and those that need to be referred higher due to the severity of the concern.

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A case file should be created for every concern raised and contain detailed records for each individual concern. Refer to Section 9 for more guidance on what information the on case files should contain. The case file must be shared with the RDA UK Safeguarding Team as soon as is practical via email to [safeguarding@rda.org.uk](mailto:safeguarding@rda.org.uk). Ensure the file is marked 'private and confidential' and password protected, where possible.

**Note:** *This email is not manned 24/7 and a phone call should be made if an immediate response is needed following the options outlined in Section 8.1.*

If the concerns were reported directly to the RDA UK Safeguarding Team, the Group will then be informed of the concerns and any proposed action. The exceptions to this are:

- where it may put a child/adult at risk in danger of significant harm, or,
- where the concern involves the Group Safeguarding Officer. In this event, the Group Chair will be informed.

If you require any guidance on how to deal with a concern, RDA UK Safeguarding Team are available to help and can advise you in accordance with these safeguarding policies and procedures. See Section 20 for contact information.

## 8.3 RDA UK Safeguarding Team

RDA UK has a legal duty to record all safeguarding concerns. Case files will be recorded and stored on the Case Management System (CMS), Globocol.

RDA UK reserves the right to share case files with the BEF and its Member Bodies in its approach to safeguarding and, where appropriate, cases must be referred to Statutory Agencies. Information will be shared on a need-to-know basis only and confidentiality must always be maintained.

Any case files shared with the BEF will be confidential, password protected documents (where possible) submitted through the Globocol portal. Correspondence with the BEF, the sharing of case files and any decisions made will be recorded in the chronology of the online record and will form part of the case file.

When referring to Statutory Agencies, the RDA UK Safeguarding Team will discuss the concern with the relevant agency to determine whether they wish to take the case forward. If so, the case files marked 'private and confidential' will be forwarded to the relevant agency. All correspondence with Statutory Agencies will be recorded as part of the case file.

If a concern becomes public knowledge, liaison with the RDA Communications Team will take place to determine how best to respond.

## 8.4 RDA UK Board of Trustees

The RDA UK Board of Trustees are informed of all cases, and where necessary, are involved in the management of Level 2 cases in conjunction with the RDA UK Safeguarding Team.

## 8.5 BEF Safeguarding Team and Case Management Group

RDA UK reports all safeguarding concerns to the BEF Case Management Group through Globocol. The BEF Case Management Group provides support and guidance on cases as required.

## 9. Recording Concerns

A detailed record of each concern should be made when raised which will form part of the case file. The record should:

- Be accurate and thorough to assist any investigation
- Contain facts
- Not include personal opinion or assumptions
- Identify hearsay where applicable
- Contain relevant information to the specific concern, including conversations that have taken place, persons involved and date/times.
- Include action taken so far.
- Any evidence, e.g. screenshots of online messages.

**Recording on Devices:** Do not make any recordings on a mobile phone or other devices. If the police decide to investigate the matter, any devices with recordings relating to a case are at risk of seizure as part of the investigation.

**Monitoring:** Concerns may be monitored at Group or national level. If the situation changes or if new information comes to light, it may be necessary to take additional action.

The completed documentation should be emailed to the RDA UK Safeguarding Team. Contact details can be found in Section 20.

Case files will be recorded and stored on the Case Management System, Globocol, in accordance with data protection legislation. Access to case files should always be on a need to know basis only.

As a minimum, cases files will consist of:

- An incident report form
- Any conversation report forms
- Any supporting evidence or documentation

### Incident Report Form

An incident report form should be completed for all concerns and should include, where possible, the following information:

- Full details of the person reporting the concern (and the person who expressed the original concern if different).
- Full details of the child/adult at risk.
- The nature of the concern, including dates and times of incidents, persons involved and any other relevant information.
- A description of any indicators you have noted.

- The person's account, if it can be given.
- Details of the alleged perpetrator and any relevant information, including accreditation, qualifications or certifications.
- Details of witnesses to the incident, including contact details.
- Details of external agencies, if applicable, including details for the person you have spoken to (name, position and crime reference number).
- Whether the parents/guardians/carers have been contacted, including details of what information has been communicated.
- Whether anyone else has been consulted, including details.

## Conversation Report Form

A conversation report form should be completed when advice is sought from or when concerns are referred to Statutory Agencies. This will predominantly apply when the RDA UK Safeguarding Team cannot be contacted, and the concern needs to be reported immediately.

As a minimum, the conversation report form should include the following information:

- Date and time of conversation
- Details of the people involved in the conversation
- Method of communication
- Details of the child/adult at risk and Group
- Details of person you are making the referral to, including their full name, contact details and role
- Crime reference number, where applicable
- Summary of the conversation
- Planned and proposed actions

## Supporting Evidence

Those handling concerns on behalf of RDA UK should not take photos of bruises or injuries as this may hinder any Police investigation or legal process. Instead, using the Body Map Form, a diagram should be drawn showing the location and appearance of bruises/injuries, using as much description as possible. In this way, any actions taken will not obstruct a formal investigation.

## Case Summary

A case summary should be developed once a case is concluded, outlining the key points of each concern. This should include:

- A clear and concise overview of the concern (not including personal details).
- Details of the actions implemented.
- Key learning points and recommendations for policy changes, working practice improvements, guidance development or training.

## Who completes which documentation?

The person raising the concern does not need to complete documentation. However, notes should be recorded regarding specific details of the concern, especially where a disclosure is received from a child to



ensure the details are as accurate as possible. The concern should be recorded in full by the Group Safeguarding Officer or the RDA UK Safeguarding Team, depending on who the concern is reported to.

## 10. Concern Threshold

Concerns are categorised into threshold levels:

- Level 1 (low threshold) – low level concerns dealt with by the Group (e.g. poor practice).
- Level 2 (high threshold) – referrals made to Statutory Agency and/or concerns that have reputational risk to the organisation.

The threshold level is based on how and where the matter is to be handled, i.e. at Group level, escalated to the RDA UK Safeguarding Team or referred to a Statutory Agency. If you require any guidance on how to deal with a concern, RDA UK Safeguarding Team are able to provide help.

## 11. Initial Steps

The initial steps to follow when deciding on an appropriate course of action are:

1. Receive concern in writing or verbally – ideally verbal concerns should be followed up in writing to ensure the details are noted down correctly.
2. Establish the facts, whether there were any witnesses, etc.
3. Determine the threshold level of the concern.
4. Define an appropriate course of action.
  - a) If the matter can be handled by the Group, the proposed actions can be found in Section 12.
  - b) If the matter needs to be escalated to the RDA UK Safeguarding Team, contact the team by phone (in the first instance) or by email on [safeguarding@rda.org.uk](mailto:safeguarding@rda.org.uk). Contact details can be found in Section 20.
  - c) If the matter needs to be referred to a Statutory Agency, you will need to follow the reporting procedure for your Local Authority which can be found on the local council website.
5. Implement proposed action.
6. Inform RDA UK Safeguarding Team of any concerns you are dealing with, by emailing [safeguarding@rda.org.uk](mailto:safeguarding@rda.org.uk). Guidance can also be sought from the team at any point in the process.

## 12. Proposed Action For Level 1 Concerns

The following actions may be used by Groups when responding to Level 1 concerns.

- No further action
- Codes of conduct
- Verbal warning

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- Written warning
- Disengagement of volunteering
- Disengagement of participation

This section should be considered in conjunction with RDA UK Codes of Conduct and Complaints Procedure.

There is no requirement for Groups to follow these actions in the order they appear. Groups are able to choose which actions will be implemented depending on the circumstances. However, these concerns should be reported to the RDA UK Safeguarding Team for information and will indicate whether there is a need to source guidance or training on a common theme.

## **No Further Action**

Following the Group looking into a concern/allegation, it may be deemed that there are no additional steps to take. The decision to take no further action should be noted in the case summary and include the reasons for this decision.

## **Codes of Conduct**

RDA has a Codes of Conduct which outline the expected standards of behaviour by all RDA activities. In some circumstances, it might be appropriate to share the Codes of Conduct with participants, volunteers or coaches to reinforce or remind people of the expectations. This can be done in person or by email, ensuring the recipient has read and understood the relevant code of conduct, in a way they are able to ask for clarification on points they do not understand.

## **Verbal Warning**

A verbal warning can be given for persistent and/or severe instances of inappropriate behaviour. Ideally this should be given as soon as is practicable and issued alongside the code of conduct to reinforce the behavioural expectations of the individual. The Group Chair, Group Safeguarding Officer or other appropriate Group Representative is best placed to give a verbal warning, ensuring there is an independent witness present to act as a neutral party.

If the warning is given to a person under 18 years, then you must ensure their parent/guardian/carer, or another responsible adult is present. For those over the age of 18, then the opportunity to have another person present with them as support should be offered.

The person receiving the warning should have the opportunity to respond to the concerns if they wish. Depending on the outcome of the conversation, it may be withdrawn if appropriate at the discretion of the Group. Verbal warnings should be recorded, and confidentiality maintained throughout.

## **Written Warning**

Repeat complaints or concerns with escalating behaviour may result in a written warning. Seriously poor behaviour may warrant a written warning without first issuing a verbal warning. The Group Chair, Group Safeguarding Officer or other appropriate Group Representative is best placed to give a written warning, ensuring there is an independent witness present to act as a neutral party.

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If the warning is given to a person under 18 years, then you must ensure their parent/guardian/carer or another responsible adult is present. For those over the age of 18, then the opportunity to have another person present with them as support should be offered.

A written warning can be issued by email, ensuring you are sending this to the intended recipient, or printed on headed paper.

The person receiving the warning should have the opportunity to respond to the concerns if they wish. This discussion should remain factual, and arguments should be avoided. The warning may if appropriate be withdrawn after those discussions at the discretion of the Group. Written warnings should be recorded, and confidentiality maintained throughout.

## **Disengagement of Volunteering**

Challenging or escalating behaviour or poor practice can have a negative impact on the safety and wellbeing of the individual, demonstrating the behaviour, or others. As a result, the Group may decide to cease any volunteering work with a person with immediate effect. The Group Chair, Group Safeguarding Officer or other appropriate Group Representative should implement this action.

The steps to follow are:

1. Explain the concerns with the person's behaviour, giving examples where possible.
2. Outline the ramifications of the behaviour, e.g. the impact on the wellbeing of others or the safety risks involved.
3. Conclude with the desired outcome, either:
  - a. Explaining the required changes to behaviour and timeframe for this to take place, or,
  - b. Stating that the person will no longer be allowed to volunteer with the Group.

If the Group decide to disengage with a volunteer, this should be recorded as part of the case actions. Confidentiality should be maintained at all times.

## **Adjustments to or Withdrawal of Participation**

Similarly to poor volunteer conduct, it might be that the behaviour of a participant is negatively impacting on the safety and wellbeing of the participant and/or others. As a result, the Group may feel it appropriate to consider adjustments to the activity plan of a participant or withdraw the opportunity to be involved with activities at the Group.

The steps to follow are:

1. Carry out a risk assessment to evaluate the risks of the participant's behaviour.
2. Identify any mitigating measures the Group can take to enable the participant to continue taking part.
3. Determine if the Group can manage these measures, e.g. can the right support be offered, can the schedule be changed to accommodate individual participation, are the measures feasible, and do the group feel comfortable doing this.
4. Have a conversation with the participant, and their parent/guardian/carer if appropriate, and explain the decision.

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The Group Chair, Group Safeguarding Officer or other appropriate Official should implement this action, ensuring there is an independent witness present to act as a neutral party.

Any agreed action should be recorded as part of the case actions and confidentiality maintained.

## 13. Proposed Action for Level 2 Concerns

The following actions might be employed by the RDA UK Safeguarding Team when responding to Level 2 concerns. These are classified as 'Disciplinary Action'. The chosen action will depend on the severity of the concern, guidance given from Statutory Agencies, if involved, and specific details of the case.

- Temporary Suspension
- Referral to Statutory Agencies, as appropriate
- Internal safeguarding investigation
- Referral to criminal record organisations for harmful behaviour
- Restriction or Prohibition from attending RDA events
- Disengagement of volunteering at RDA in any capacity

### Temporary Suspension

It may be deemed necessary to temporarily suspend an individual for a defined period of time whilst an investigation into the allegation is underway.

The RDA UK Safeguarding Team will conduct a risk assessment to consider the need to temporarily suspend a person based on the concern details, the risk to vulnerable people, any measures which can be accommodated for (e.g. change of roles/responsibilities) and/or advice from Statutory Agencies, when involved.

The decision will be communicated to the individual by formal letter. This letter may be posted to a known address or emailed to the individual, after confirming the correct recipient email address.

### Referral to Statutory Agencies

Where a child or adult at risk has been harmed or is at significant risk of harm, the concern will be reported to the relevant Statutory Agency, following the reporting procedures of the Local Authority.

Where an adult at risk is involved, the adult should be included in this discussion and their views on what they would like to happen sought, before making a referral. However, if you feel a referral should still be made and you do not have consent from the adult at risk, then you need to make this clear to Adult Social Care.

Any action taken after this referral has been made will be based on advice and direction given by the relevant Statutory Agency.

### Internal Safeguarding Investigation

It may be necessary to carry out a full safeguarding investigation and disciplinary hearing when a concern has been raised in respect of safeguarding children or adults at risk. This could be in relation to abusive behaviour, abuse or position of trust matters. The Complaints Procedure (available on MyRDA, under Policies) should be followed and the BEF Case Management Team consulted, where necessary.

The outcome of an internal safeguarding investigation will include determining the appropriate course of action to take.

## Referral to Criminal Record Organisations

Following the conclusion of an investigation, RDA UK has a duty to refer any harmful behaviour of an alleged perpetrator to the relevant criminal record body. Criminal record bodies include:

- Disclosure & Barring Services (DBS) for England and Wales
- Disclosure Scotland (PVG) for Scotland
- NI Direct (Access NI) for Northern Ireland.

The relevant body's referral process will be followed.

## Restriction or Prohibition from attending RDA events

RDA UK reserves the right to restrict and/or prohibit attendance by a person considered to be unsuitable at any of its activities and operations. Reasons could include, but are not limited to:

- Someone who is convicted of offences against children, e.g. required to sign the Sex Offenders Register.
- Someone who continually demonstrates poor behaviour which may be detrimental to others.
- Someone whose behaviour is deemed to impact negatively on the efficient and safe running of an event, including:
  - Physical or verbal violence
  - Inappropriate language
  - Bullying
  - Disruptive behaviour
  - Drunkenness
  - Stealing
  - Sexually inappropriate behaviour or actions
  - Discrimination
  - Taking or selling illegal substances
  - Criminal behaviour

Where it is felt necessary to restrict or prohibit an individual's attendance at events, the individual will be politely asked to leave the event and to refrain from attending future events. This will then be followed up in writing within 7 days. The restriction applies to the person in question and does not extend to other participants, family members or relatives.

## 15. Appeals

Anyone who is subject to disciplinary action may appeal against the decision(s) made in line with the Complaints Procedure.

## 16. Child Death Reviews (Applicable to England and Wales)

If a child dies while taking part in an RDA activity, the Local Safeguarding Board may initiate a child death review. RDA UK may be asked to contribute to and support with this review. The protocol to follow in these circumstances is detailed in the statutory guidance document "Working Together to Safeguard Children (2020)". RDA UK has sought training for appropriate personnel in case of need.

## 17. Sharing Information

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Information should be shared on a strict need to know basis and should remain confidential as far as is practicable. While complete confidentiality cannot be guaranteed due to the duty of care in safeguarding against abuse, any concerns of harm must be promptly reported and measures taken to safeguard the person from further harm.

RDA UK reserves the right to investigate any safeguarding concern and/or to make a referral to the appropriate Statutory Agency, as required. The priority is always the welfare of the person at risk.

Information may be shared with the following people, where appropriate:

- Group Safeguarding Officer
- The parent/guardian of the child/adult at risk (where appropriate and only if it will not harm the child/adult at risk to do so)
- The person making the allegation (where appropriate and only with information they need to know)
- RDA UK Safeguarding Team
- The BEF and its Member Bodies (where the person of concern is involved in other organisations)
- Statutory Agencies, including: Police, Children or Adult's Social Care or Social Work Services, LADO, MASH Team, etc.
- BEF Case Management Group and designated officers within RDA UK.
- Legal advisors of RDA UK, the BEF or its Member Bodies.

Parents, guardians or carers are entitled to be informed of any concerns raised about their child or adult at risk, regardless of the situation. This information should be communicated by the Group Safeguarding Officer or another designated person. However, if disclosing this information to the parents, guardians or carers poses a potential risk of further harm to the child or adult at risk, it must first be referred to the Group Safeguarding Officer and/or the RDA UK Safeguarding Team for assessment before being shared. In cases where there is an immediate risk of harm, it is crucial to inform the Police or Social Care immediately, who will determine the appropriateness of notifying parents, guardians or carers.

## 18. Confidentiality & Data Protection

RDA UK must comply with data protection legislation with regards to the use and storage of personal information. Therefore, all personal data should be treated in accordance with the six principles specified in the legislation. These principles relate to:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

Please refer to RDA's GDPR policy for further information.

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## 19. Review and Monitoring

This document will be reviewed annually and updated as necessary, in line with the legal and statutory framework, to ensure it remains relevant and effective. Feedback from incidents, investigations and stakeholders will be considered in the review process to continually improve safeguarding procedures.

## 20. Contact Information

If you have concerns about the safety or welfare of a child or adult at risk, or need further information about this Policy, please contact the RDA UK Safeguarding Team.

<b>For communication regarding safeguarding concerns, email: <a href="mailto:safeguarding@rda.org.uk">safeguarding@rda.org.uk</a></b>	
<b>Stef Brazier</b> <i>Safeguarding Officer</i> Tel: 01926 476302 Email: <a href="mailto:sbrazier@rda.org.uk">sbrazier@rda.org.uk</a>	<b>Marisa Bretherton-Mackey</b> <i>Membership Services Manager</i> Tel: 01926 405973 Email: <a href="mailto:marisa@rda.org.uk">marisa@rda.org.uk</a>
<b>Emma Wells</b> <i>RDA UK Trustee &amp; Safeguarding Representative</i>	<b>Lynda Whittaker</b> <i>National Safeguarding Lead</i>