



WRU SAFEGUARDING POLICY & PROCEDURES

DON'T TACKLE IT ALONE



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FOREWORD

Foreword by CEO

I am delighted to provide the foreword for the new WRU Safeguarding Policy, which outlines the continuing commitment of the Welsh Rugby Union to develop and maintain safe and positive environments for everyone involved in Welsh Rugby, but particularly for children and adults at risk who participate in Rugby Union across Wales.

Safeguarding is a key component of the Welsh Rugby Union's drive to support the work of our volunteers in our communities and clubs across Wales. We recognise the importance of evolving our policies, procedures and practice, and managing that change by working together with stakeholders. We want to ensure that all people involved in our great game have the opportunity to participate, volunteer and support safe and inclusive environments and embed a safeguarding culture in our clubs, hubs and regions.

The WRU have responsibilities to safeguard in both the community and professional game. They work in partnership with the Club Safeguarding Officers to develop safe and inclusive environments and deliver great experiences for everyone involved in the game

The WRU work closely with the Disclosure and Barring Service (DBS), Wales Sport Association (WSA), Sport Wales, the National Society for the Prevention of Cruelty to Children (NSPCC), Child Protection in Sport Unit (CPSU) and the Ann Craft Trust (Safeguarding Adults) to ensure that we have robust safe recruitment and effective risk management procedures in place. This is extremely important when recruiting employees and volunteers, within Welsh Rugby.

Club Safeguarding Officers (CSO) operate in our clubs, hubs and regions and they are supported by the WRU Safeguarding Team in providing timely and assured advice and guidance, along with training opportunities to empower and up-skill our volunteer workforce.

We will continue to work alongside our clubs, hubs and regions to strengthen all aspects of our safeguarding activities so that everyone involved in Welsh Rugby continue to enjoy the sport within a safe and positive environment.

We are committed to developing positive working relationships, based on the principle that the welfare of the children and adults involved in the game is the paramount consideration. The involvement of CSO's and other volunteers in shaping things for the future is a positive step in ensuring that we have a robust but practical approach to safeguarding.

I hope that you find this policy a useful reference document and I would also like to take this opportunity to thank all those people who support the WRU's work in this area.

A handwritten signature in black ink, appearing to read 'Abi Tierney'.

Abi Tierney
Welsh Rugby Union Group Chief Executive

INTRODUCTION

As the national governing body for Welsh Rugby, the WRU has a wide leadership, governance and on occasion, enforcement role, which ensures that rugby in Wales is able to flourish, through the provision of safe, inclusive environments that prioritise individual rights and dignity, and address inappropriate activity.

This position is most evident in our response to Safeguarding, where we have met our legal and moral obligations holistically, highlighting the ways in which we can all contribute to protecting those potentially subject of harm; children and adults at risk. Our procedures seek to prevent such harm, whilst supporting the recognition of, and effective response to, any cases that do unfortunately occur.

POLICY STATEMENT

The WRU is committed to ensuring that everyone in Wales, irrespective of their age, race, religion or belief, disability, gender identity or sexual orientation, has equality of opportunity and can participate in our national game in a safe, enjoyable and inclusive manner. In doing so, we recognise the principle that the welfare of children and adults at risk is paramount.

The WRU acknowledges the duty of care to safeguard and promote the welfare of children and adults and is fully committed to ensuring that safeguarding practice reflects statutory responsibilities, government guidance and promotes best practice. The WRU will develop robust policies and procedures that minimise the risk of children, young people and adults experiencing abuse within Welsh Rugby.

Safeguarding is the principle of protecting children, young people and adults at risk from harm or any form of abuse, maltreatment or neglect, whilst promoting their welfare to ensure that they feel safe, empowered and able to develop to be at their best.

Safeguarding is a collective duty; it requires everyone across the game to take responsibility for ensuring that we prevent any potential safeguarding risks before they happen. Where incidents do occur, it's important that everyone is able to recognise the safeguarding risk and understand the need to intervene where serious immediate risk exists. All safeguarding incidents should be reported through the correct channels.

The WRU take the lead role for safeguarding within Welsh rugby, mandating all affiliated clubs and other relevant bodies to adopt and implement the WRU's Safeguarding Policies and Procedures, and ensure that there is:

- appropriate safeguarding training and awareness provided to staff and volunteers, to be able to recognise and respond to concerns in line with the Six R's.
- an effective mechanism to report safeguarding concerns.

- an effective and comprehensive investigative, case management response delivered by skilled and experienced staff.
- a robust plan in place delivered by appropriately skilled staff to investigate concerns and manage caseload effectively.
- independent oversight of safeguarding and misconduct cases, with relevant matters being referred to independent panels for determination.

Rugby is a sport that can have a positive influence on everyone and assist in developing valuable qualities such as leadership, confidence and self-esteem. Rugby clubs and hubs across Wales have a key role in providing opportunities for people, and in particular children to be empowered so that they develop these qualities. In order to achieve this, safeguarding and the welfare of children and adults in our game are the paramount considerations in developing a safeguarding culture.

The WRU are also committed to increasing regular engagement and participation across all ages in Welsh Rugby. We are committed to supporting strong vibrant clubs and hubs that retain the values of rugby, are inclusive and provide everyone with a positive rugby experience, whilst contributing to the long-term health and well-being of society.

Coaching is a key aspect of the game, and Coaches should strive to develop and sustain safe and inclusive environments, by building positive relationships and inspiring people, which will ultimately provide a positive rugby experience, and a sense of belonging.

The WRU is committed to implementing a policy, so that everyone involved in Welsh Rugby accepts and understands their responsibilities to safeguard children and adults from harm and abuse. This means that there is a responsibility to follow procedures to protect children and adults and report any concerns about their welfare to appropriate authorities.

The WRU recognises that safeguarding is everyone's responsibility and expects all staff, members and volunteers to be fully committed to promoting and implementing the policy throughout the sport.

The WRU recognises the importance of equality, diversity and inclusion and expects all staff, members and volunteers to promote equality of opportunity in rugby at all levels.

The policy includes four different sections for ease of reference, and these can be downloaded as stand-alone documents:

- [Role of the Club Safeguarding Officer](#)
- [Safeguarding Children Policy](#)
- [Safeguarding Adults Policy](#)
- [WRU Safeguarding – Whistleblowing and Case Management Procedures](#)

There is also an abbreviated version of this policy which is also available on the WRU website.

The WRU recognises the importance of equality, diversity and inclusion and expects all staff, members and volunteers to promote equality of opportunity in rugby at all levels.

The WRU Safeguarding Policy and Procedures must be adopted by Clubs and other affiliated bodies, as this is mandatory for anyone within the sport who is involved either directly or indirectly with children and adults as part of their role in the sport.

The WRU Safeguarding Policy aims to clarify what is required in relation to the protection of children and adults –

- Recognise that the safety and welfare of the child is paramount, and that the child is potentially at risk when child abuse is reported or suspected.
- Recognise that the safety and welfare of adults must be appropriately managed to protect them from abuse or neglect.
- Set and implement standard procedures to protect children, young people and adults when suspected or actual abuse is reported.
- Ensure that adequate steps are taken to ensure that unsuitable people are not employed or deployed in activities or programmes.
- Create a safe and inclusive environment for everyone involved in Welsh Rugby.
- Ensure that staff and volunteers are supported and trained to recognise and respond appropriately to safeguarding or poor practice concerns (e.g. to follow the process outlined for reporting concerns).
- Assist all Clubs and Volunteers to understand the correct procedures.
- Promote good practice and actively challenge practices and behaviour that are not at the required standard (See Coaches Code of Practice).



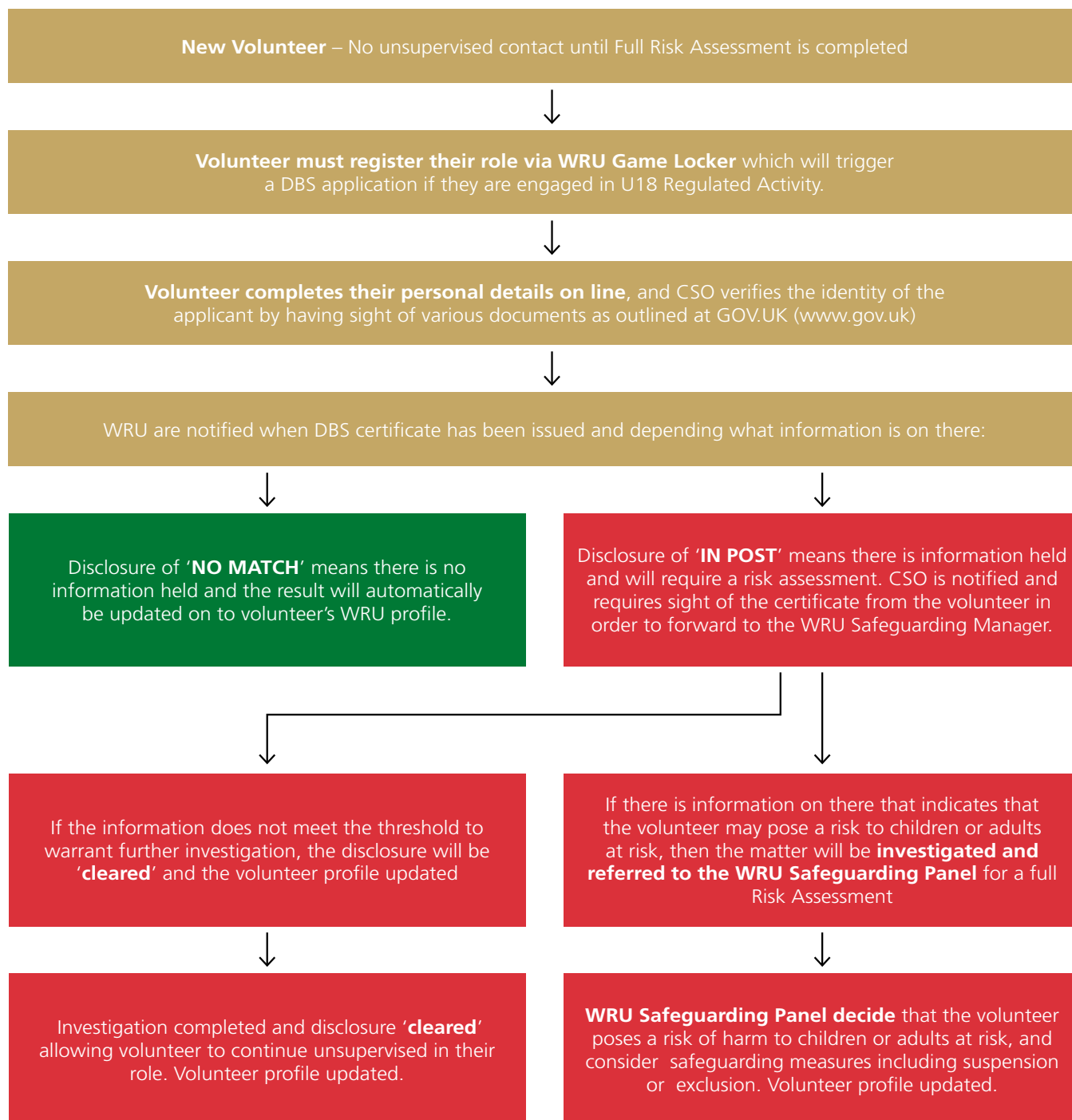
THE CORE PRINCIPLES - HOW WELSH RUGBY WILL DELIVER SAFEGUARDING

The core principles are:

- Safe Recruitment
- Recognising Poor Practice and Abuse
- Reporting and Responding to Concerns – The Six R's
- Information Sharing and Working Together
- Case Management
- Developing a Safeguarding Culture

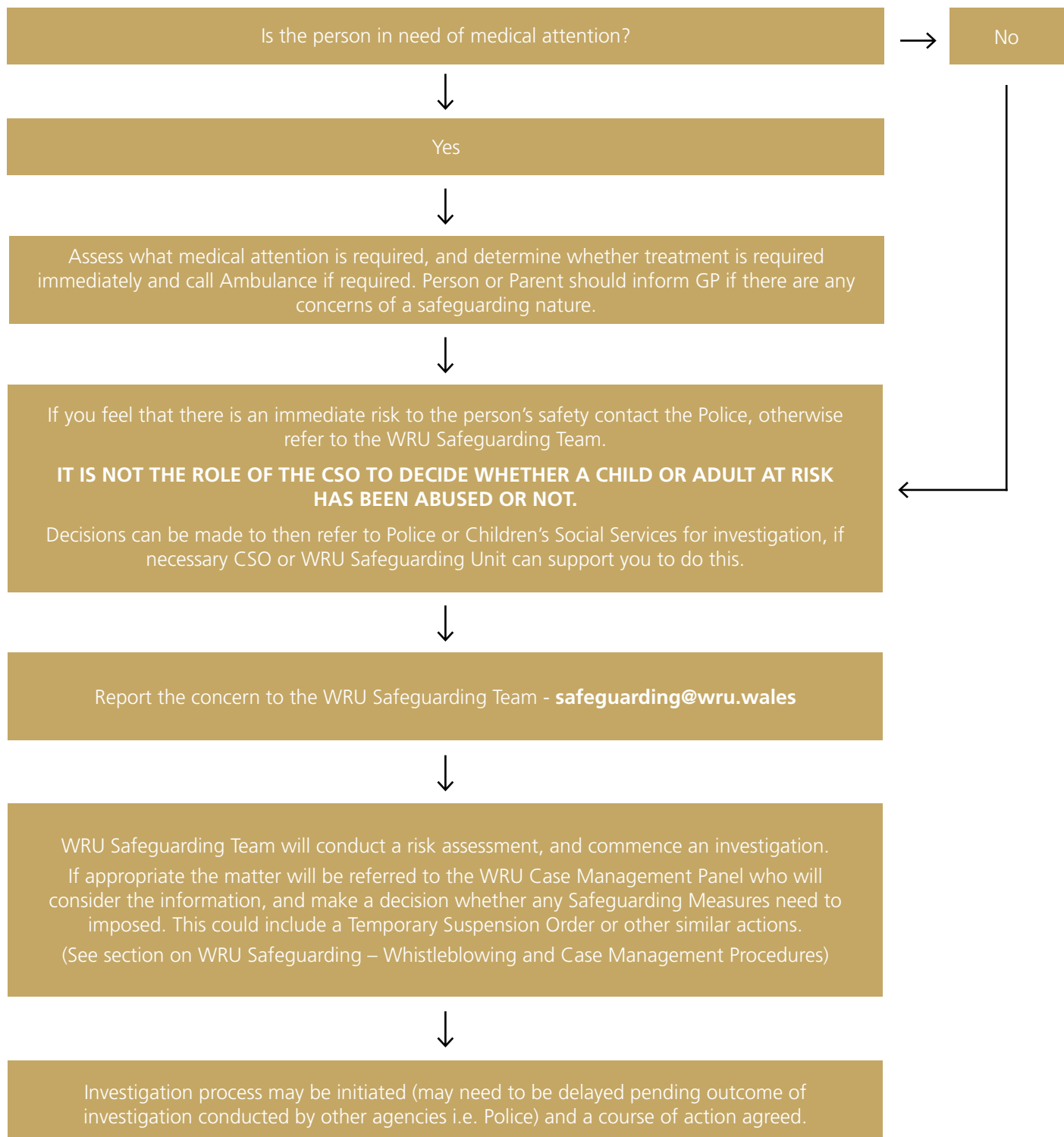


VOLUNTEER RECRUITMENT RISK MANAGEMENT FLOWCHART



RESPONDING TO ALLEGATIONS OF ABUSE (within or outside a rugby environment)

Follow the Six R's. Recognise what the issues are and ensure that the Child or Adult at Risk is Reassured. If there is a risk of further immediate abuse, take action and if urgent contact the Police. Record what is said or a summary of this and ensure that you Retain any written records. Do not make promises of confidentiality.



Legislation and Government Guidance

There are a number of key pieces of legislation and government guidance that are relevant to the safeguarding policy and procedures, and these are included in the Wales Safeguarding Procedures

<https://safeguarding.wales/en/>

Promotion and Distribution of the Policy

The policy is available electronically and will be circulated to all Club Safeguarding Officers (CSO's) and also be available on the WRU website and Game Locker.

Quality Assurance

The WRU will review the effectiveness and implementation of the policy and procedures by:

- Monitoring compliance with the policy and procedures
- Providing reports to the Board on all matters relating to safeguarding.
- Conduct case reviews following the conclusion of any major child protection case within Welsh Rugby.
- Feedback from the Child Protection in Sport Unit (Safeguarding Children) and Ann Craft Trust (Safeguarding Adults).
- Feedback from the Independent Safeguarding Advisory Group.
- Seeking the views of key stakeholders in the sport, including children, young people, and adults.
- Feedback from stakeholders i.e. Clubs, Hubs and Regions.
- Feedback from Club Safeguarding Officers.



TERMINOLOGY AND DEFINITIONS

Abuse (Children)	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
Abuse	Abuse is a violation of an individual's human and civil rights by another person or persons. A violation of a person's physical, emotional or mental integrity.
Adult	Adult is anyone aged 18 or over
Adult at Risk	An 'Adult at risk' is an adult who: Is experiencing or is at risk of abuse or neglect, and has needs for care and support, and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
Adult Safeguarding	Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.
Appeal Panel	This is a panel appointed to hear an appeal in accordance with the WRU Safeguarding Case Management procedures.
Bullying	Behaviour by an individual or group usually repeated over time, that intentionally hurts another individual or group either physically or emotionally.
Capacity	Capacity refers to an individual's ability to make a decision or take a particular action for themselves at a particular time, even if they are able to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear for sports activity, or what a healthy sports diet would be, but they lack capacity to make more complex decisions about financial matters.
Children	Children is anyone under 18
Codes of Conduct	These are a set of standards of behaviour that promote the values of our game, to ensure that the reputation and integrity of the game is maintained.
Coaches Code of Practice	The Coaches Code of Practice provides guidelines for a set of standards and behaviours for coaches, to protect the welfare of individuals and groups with whom coaches work, as well as giving the coach reference points as how to react in difficult situations. https://www.wrugamelocker.wales/media/1859/wru-coaches-code-of-practice.pdf The Coaches Code of Practice promotes responsible and ethical behaviour by recognising the need to respect the rights of individuals, building positive relationships with those that they coach, and having both high personal and professional standards as role models, especially when coaching or working with children, or adults at risk.
Disabled	The Disability Discrimination Act (1995) defines a person as having a disability 'if he has a physical or mental impairment which has

	substantial and long-term adverse effect on his ability to carry out normal day to day activities’.
Discipline Regulations	The WRU Discipline Regulations are a set of regulations that and Codes of Conduct, which can also be applied in managing safeguarding matters.
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. In loco parentis (from Latin meaning ‘in place of a parent’) refers to a person who has been given explicit permission to assume parental responsibility for a child by his or her parents or legal guardian.
Financial Abuse	While the Care Act 2014 definition is clear, financial abuse take many forms. It’s a type of abuse that can start subtle and is often hard to detect. When defining financial abuse, we know there are many elements at play. It is true that financial abuse often involves or is associated with: • Someone taking or misusing someone else’s money or belongings for their own gain • Harming, depriving or disadvantaging the victim • Controlling someone’s purchases or access to money • Often associated with other forms of abuse • Doesn’t always involve a crime like theft or fraud
Harm	Damage done to a person’s well-being.
Hybrid Panel	This is a term used for a panel that is convened under the WRU Discipline Regulations but includes panel members that have safeguarding expertise due to there being a safeguarding element to the complaint.
Independent Chair	The WRU Safeguarding Panel will be chaired by an Independent Chair, who is responsible for chairing any proceedings in accordance with the WRU Safeguarding Policy. The Independent Chair will be appointed from the pool of Independent Panel Members, who have the appropriate experience and expertise in dealing with safeguarding matters and have received relevant training. The Chair will have responsibility for making safeguarding decisions based on the available information.

Independent Panel Member	The WRU Safeguarding Panel will consist of a Chair and two Panel Members, who are all independent and have the appropriate experience and expertise in dealing with safeguarding matters and have received the relevant training. The Panel Member will have responsibility for making safeguarding decisions based on the available information.
Independent Safeguarding Advisory Group	An independent group that ensures the WRU carries out its role and maintain an overview of the implementation of the WRU's safeguarding functions.
Lower-Level Concerns	A lower-level concern is any concern, doubt, or sense of unease, no matter how small, that someone may have acted in a way that is inconsistent with an organisations code of conduct.
MASH	Multi-Agency Safeguarding Hubs are used as a one point of contact/safeguarding referrals in some areas. Where they exist a referral to MASH benefits from the information held by and the expertise of various agencies e.g. Local Authority, Police and Health.
Mental Capacity	The ability to consider relevant information, make and communicate a decision.
Misconduct Case	These are Code of Conduct cases that are referred through the WRU Safeguarding Case Management procedures and are dealt with as disciplinary matters.
Need to know	In the context of sharing confidential information, disclosing details only to those people who have to be informed in the interests of a child or children. The factors that need to be considered when determining whether to disclose information include: the reason for sharing the information; the level of detail that needs to be disclosed; with whom the information will be shared; and whether disclosing the information is a proportionate response to the need to protect a child from harm.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may also occur during pregnancy as a result of maternal substance abuse.
Other Rugby Related Activity	This is the activity that is undertaken in a rugby related environment (on or off the field) where someone is in a role that does not have unsupervised access to children on a regular basis. In general terms this would apply to Players, Rugby Administrators, Club Officials or other Volunteers.
Panel Member	The WRU Safeguarding Panel will comprise of an independent Chair and two other panel members. The Panel Members will be independent of the WRU who are appropriately trained and have the skill set to examine evidence and determine what safeguarding measures need to be taken.
Parental responsibility	The legal rights, duties, powers, responsibilities and authority a parent has for a child and their property. A person who has parental responsibility for a child has the right to make decisions about their care.

Person Subject of Concern (PSC)	This is a person who is subject to investigation regarding a safeguarding concern. This can range from the most serious allegations to low level concerns.
Position of Trust	Position of Trust is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. The adult must be involved in coaching, teaching, training, supervising, or instructing a young person, carried out on a regular basis and is in a position of authority or responsibility.
Physical Abuse	Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
Regional Safeguarding Boards	These are strategic bodies with responsibilities to ensure effective safeguarding of children and adults at risk across key agencies.
Regulated Activity (Children)	For the purposes of identifying roles or individuals qualifying for DBS checks, as part of the child workforce, regulated activity is defined as: Unsupervised contact with children through teaching, training, instructing, caring for, supervision, providing advice and guidance on well-being or transport specifically for children regularly • Once a week or more • Three or more occasions in a period of 30 days • Overnight between 2.00 a.m. and 6.00 a.m.
Rugby Regulated Activity	This is the activity that is undertaken in a rugby related environment (on or off the field) where someone has unsupervised access to children, as in the definition of regulated activity above. This would apply to Coaches, Team Managers, First Aiders, Medical Staff and Referees.
Safeguarding	Safeguarding is protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.
Safeguarding Adults Board (SAB) (England and Wales)	A statutory body set up in line with national legislation. Statutory membership includes the Local Authority, Police and NHS. Representatives from the voluntary sector and of 'citizens' e.g. a representative from a disabled people's forum are often also included. Their role is to coordinate safeguarding work across the Local Authority district.
Safeguarding Measures	These are measures taken to ensure that appropriate safeguarding is implemented when a risk has been identified. These can involve a variety of actions and are outlined in detail in the WRU Safeguarding Policy.
Safeguarding and Promoting the Welfare of Adults	Promoting the importance of safeguarding adults throughout the whole organisation. Recognising that there is a duty of care to everyone within the organisation. Responding proportionately where abuse or neglect is suspected. Understanding that adults should be fully involved and able to influence decisions in respect of their welfare.
Sexual Abuse	This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

	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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
Social Services	Throughout the procedures the generic term social services are used to represent the relevant local authority social services functions with regard to children and adults at risk
Young Carers	Children and young people who assume important caring responsibilities for parents or siblings, who are disabled, have physical or mental health problems, or misuse drugs or alcohol.
WRU Safeguarding Panel	This is a panel appointed to consider safeguarding concerns, conduct risk assessments and where appropriate, apply safeguarding measures or other appropriate actions to safeguard people involved in Welsh Rugby.

SAFEGUARDING IN WELSH RUGBY – GOVERNANCE

‘Don’t Tackle it Alone’

Taking Responsibility and Managing Accountability through Effective Governance

WRU Board has responsibility for the organisation’s safeguarding arrangements

External Scrutiny

WRU Independent Safeguarding Advisory Group

Child Protection in Sport Unit

Ann Craft Trust

Sport Wales

WRU Board

WRU Integrity Board Champion Responsible for Safeguarding

WRU Executive

WRU Executive Director Responsible for Safeguarding

Strategic Responsibility

Designated Safeguarding Lead - WRU Head of Policy and Integrity

Operational Responsibility

WRU Safeguarding Manager supported by WRU Safeguarding Co-ordinator

Club, Hub and Regional Responsibility

Strategic Responsibility - Club, Hub and Regions Committees or Boards

Operational Responsibility - Club Safeguarding Officers

Developing Safe and Inclusive Environments

Embedding a Safeguarding Culture

‘Don’t Be a Bystander’

Governance

The WRU are committed to good governance, and ensuring that we support the people who play, coach, officiate, volunteer or work within the game. People should have the opportunity to have great rugby experiences through the development of safe and inclusive environments in our clubs, hubs and regions.

To enable this to happen we need to have systems, policies, procedures and regulations; all of which are absolutely key to any high performing organisation.

Good governance is a key foundation of the WRU's intention and commitment to provide safe and inclusive environments within the game.

The Governance and Leadership Framework for Wales is the benchmark for this to be delivered across sport in Wales.

<https://www.sport.wales/download/file/1426/>

Roles and Responsibilities

The overall responsibility for safeguarding rests with the WRU Board who will ensure the procedures for safeguarding and promoting the welfare of children and adults are managed appropriately.

The WRU will also ensure there is a nominated Club Safeguarding Officer for each club, hub or region. It is important to have the necessary safeguards in place, with the Club Safeguarding Officer being a key role within Welsh Rugby, and central to driving this forward.

The WRU will develop and monitor an Action Plan that sets out how the WRU will work towards maintaining the requirements of both the NSPCC Child Protection in Sport Unit National Safeguarding Standards for Safeguarding and Protecting Children in Sport, and the Ann Craft Trust Safeguarding Adults Framework.

The WRU are responsible for regulating the conduct of individuals within Rugby Union across Wales, and work in partnership with the Police, Social Services and other statutory sector organisations to ensure that all concerns, allegations or suspicions of abuse are reported, and all relevant information is shared to support these organisations in fulfilling their safeguarding obligations.

The Welsh Rugby Union will support clubs, hubs and regions through Engagement, Education and Enforcement

Engagement

The WRU will engage with clubs, hubs and regions to provide support to ensure that they have safe environments through Leadership, Governance, Policy, and Communication

Leadership

- To provide leadership and support to our network of Club Safeguarding Officers
- To provide leadership and support to all volunteers and staff within the game
- Promoting the development of safeguarding standards across the game

- Supporting the development of a national framework for safeguarding standards in Welsh Rugby
- Ensuring safeguarding requirements are embedded within business planning across Welsh Rugby

Governance

- To ensure that there are inclusive and effective governance systems and structures with suitably qualified and skilled individuals
- To ensure that Safeguarding Policy and Procedures supports all participants in Welsh Rugby
- To ensure all organisations in Welsh Rugby take responsibility for developing safe environments and a safeguarding culture
- To work with other national governing bodies to create Communities of Practice to develop best practice

Policy

- To develop a WRU Safeguarding Policy to ensure that it supports the needs of the participants of the game in Wales
- To develop a policy that promotes best practice and develops protective measures that are appropriate, to ensure that children, young people and adults at risk have positive experiences in Welsh Rugby
- To develop a policy that enables the game to grow, with safe and inclusive environments across Welsh Rugby

Communication

- To create a communication strategy for safeguarding to ensure it is embedded across Welsh Rugby
- To design and deliver a communication plan to all participants and stakeholders involved in Welsh Rugby, to promote best practice in safeguarding
- To develop bespoke information for different groups, i.e. Club Safeguarding Officers, Club Officials, Coaches, Team Managers, Players, Parents, and particularly young people and adults

Education

The WRU are committed to educating volunteers, staff and club members to ensure that they have safe environments through Learning and Development

- To develop and establish a wide-ranging safeguarding learning and development framework across Welsh Rugby
- To build a network of safeguarding educators to educate the volunteer and professional workforce, parents, and key stakeholders across Welsh Rugby
- To develop safeguarding education resources that are accessible, engaging and relevant to all stakeholders in Welsh Rugby, to ensure that safeguarding is embedded across the game

Enforcement

The WRU are committed to ensuring that there are safe and inclusive environments in Welsh Rugby, and provide leadership around safe recruitment, case management and quality assurance.

Safe Recruitment

- To develop and create a Safe Recruitment Policy to ensure that we have safe and inclusive environments in Welsh Rugby.
- To ensure that the policy is fair but robust and focussed upon recruiting volunteers and staff. who are working or volunteering with children in regulated activity or working with adults.

Case Management

- To ensure that there is an effective mechanism to report safeguarding concerns.
- To ensure that there is a robust plan in place to manage caseload effectively.
- To ensure that appropriately skilled staff and panel members are in place to make appropriate decisions.
- To ensure that there is a balanced mix of WRU Board and Independent Panel Members.
- To ensure that the WRU has a secure and confidential safeguarding recording system in place.

Quality Assurance

- Implement robust safeguarding Policies and Procedures that comply with National Safeguarding Standards.
- Ensure that everybody has a 'Voice' and feels comfortable with reporting procedures.
- Ensure that the WRU engages appropriately trained/experienced Safeguarding personnel.
- Ensure that recording systems are effective and up to date.

Club Safeguarding Policy and Governance

Affiliated clubs and other relevant bodies must:

- formally sign up to the WRU Policy and Procedures or adoption of a Club Policy that complies with WRU requirements.
- ensure that the Senior Management Committee or Board within the club recognise that they have overall responsibility for safeguarding.
- appoint a Club Safeguarding Officer (CSO) to manage safeguarding matters within the club, on behalf the Club Board or Committee.
- appoint a Club Operations Manager to lead on Match Day Protocols and promote safe and inclusive environments, both internally and externally.
- ensure that the CSO has appropriate support from the Club Board or Committee in promoting and ensuring adherence to the Safeguarding Policy.

- ensure that there are accurate and reliable records of all volunteers who are involved in working with children and adults retained on the WRU database, including safeguarding compliance.
- ensure that the club support the WRU in conducting safeguarding investigations.
- ensure that the club have appropriate vetting and safe recruitment procedures for anyone working in regulated activity.
- ensure that members are able to easily access the safeguarding policy.
- ensure that members are able to readily identify and contact the CSO.
- ensure that CSO contact details are circulated to key groups within the club.

PARTNERSHIPS

NSPCC

The NSPCC operate a free 24-hour helpline (0808 800 5000) or email help@NSPCC.org to provide advice and support to anyone with concerns about the welfare or safety of a child. There is also a free 24-hour helpline available through Childline to help children & young people (0800 1111).

[Childline | https://www.childline.org.uk](https://www.childline.org.uk)

The Child Protection in Sport Unit (CPSU)

The CPSU is a partnership between the NSPCC, Sport England, Sport Northern Ireland and Sport Wales. The Unit plays a strategic role in the landscape of sport in the UK. The CPSU was founded in 2001 to work with UK Sports Councils, National Governing Bodies (NGBs), Active Partnerships and other organisations. The CPSU support organisations to implement and maintain safeguarding practices, to minimise the risk of abuse and ensure that sports stay safe and enjoyable for all those involved.

The CPSU was founded in response to a series of high-profile cases of abuse of young athletes. The Unit works to help improve and promote good safeguarding and child protection practice to all children and young people are safe while participating in sport and physical activity at all levels.

The CPSU mission is to build the capacity of sports to safeguard children and young people in and through sport and to enable sports organisations to lead the way in keeping children safe from harm.

This includes:

- Being a lead voice, champion, pioneer UK wide and internationally.
- Providing expert safeguarding and child protection advice to sports organisations.
- Contributing safeguarding knowledge to their policies, procedures and programmes.
- Developing and delivering sports specific training, resources and guidance.
- Coordinating, lobbying and advocating on behalf of the sports sector in response to government consultations.
- Commissioning and supporting research into a range of issues, developing understanding and an evidence base.
- Consulting with children and young people.
- Working with international organisations to promote safeguarding.

The CPSU play the lead role in helping sports organisations to develop and implement their responses, policies and procedures, systems and structures for safeguarding.

- Children and young people have a right to enjoy sport, free from all forms of abuse and exploitation.
- Everybody has a responsibility to support the care and protection of children and young people.

- Sporting organisations have a duty of care to children and young people who take part in sport.

Since 2001, the CPSU has worked with sport and statutory agencies to ensure that all children, regardless of their level of participation in sport or where they participate, have a safe and enjoyable experience.

The CPSU help organisations to:

- Recognise their responsibility to protect children and young people left in their care.
- Recognise their responsibility to pass on any concerns about children's welfare or protection. in their families or communities to a statutory agency.
- Develop strategies and standards to protect children and young people.
- Identify and respond to adults who are a threat to children and young people.
- Develop safeguarding knowledge and skills among all staff and volunteers.

The CPSU Wales Team support and guide the National Governing Bodies and National Partner Organisations with their safeguarding and child protection provisions within the sector.

This is implemented through the CPSU Framework for safeguarding and protecting children in sport.

[NSPCC Child Protection in Sport Unit | CPSU \(thecpsu.org.uk\) https://thecpsu.org.uk](https://thecpsu.org.uk)

The Ann Craft Trust (ACT)

The Ann Craft Trust work with Sport England and Sport Wales to develop best practice in safeguarding adults at risk within sport. Safeguarding adults is a responsibility for every sport and physical activity organisation. Getting this right will ensure a wider participation in sport or physical activity and ensure safe access for everyone.

The ACT provide a range of materials to assist sports in providing the appropriate environment for all. A wide range of templates and resources designed for all sports clubs are available to download on the ACT website.

<https://www.anncrafttrust.org/safeguarding-adults-sport-activity/>

ACT offers expert adult safeguarding telephone and email advice to sport and activity organisations. They encourage discussions and contact around situations or tasks that sports find difficult, from policy and procedures to issues with participants.

In addition, ACT are experts in providing specialist Safeguarding Adults in Sport and Activity Training, as well as a variety of other training options.

Sport Wales

Sport Wales is the agency responsible for the development of sport and physical recreation in Wales. Its role is to increase participation, improve sporting performance, and to raise standards in sport and physical recreation amongst the Welsh population.

The Welsh Rugby Union receive investment from Sport Wales to deliver on the Vision. Sport Wales fund the CPSU and ACT to work with partners and offer advice, guidance, training and development opportunities with Child and Adult Safeguarding respectively. This way, Sport

Wales can have confidence that the National Governing Bodies they are investing in are upholding relevant and effective safeguarding standards within their organisation and ensuring their sport is a safe place to participate free from abuse and harm.

Welsh Sports Association

The Welsh Sports Association (WSA) is the independent membership body for the sport and leisure industry in Wales, charged with the task of providing leadership, advocacy and a gateway to business & governance services for the sector.

The Welsh Sports Association (WSA), via trading arm Vibrant Nation, provides a bilingual, online DBS Check (Disclosure and Barring Service) ensuring sport and physical activity is safe for everyone to enjoy. Tested and approved by the Ministry of Justice and The Home Office, it has also been endorsed by both Welsh Government and the NSPCC.

Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children, and adults at risk. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

The DBS are responsible for:

- Processing requests for criminal records checks.
- Deciding whether it is appropriate for a person to be placed on or removed from a barred list.
- Placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland.

The DBS make fair, consistent and thorough barring decisions that are an appropriate response to the harm that has occurred, as well as the risk of harm posed.

DBS are keenly aware of the impact barring or not barring can have both to the person under consideration and also those with whom they have or could have come into contact. Often very difficult and finely balanced decisions have to be made.

Based on the test for regulated activity the DBS can only bar a person from working within regulated activity with children or adults if they believe the person is or has been, or might in the future be, engaged in regulated activity.

DBS work with the police, who provide information that is held locally or on the police national computer. When disclosing information held locally, the police follow the quality assurance framework developed by the Association of Chief Police Officers (ACPO) and the DBS.

THE ROLE OF THE CLUB SAFEGUARDING OFFICER

The WRU are committed to increasing and enhancing regular engagement and participation across all ages, formats and competitions, in strong vibrant clubs and educational settings that the values of rugby and provide everyone with Positive Rugby Experiences, whilst contributing to the long-term health and well-being of society.

The WRU are working with partners to ensure that our clubs are inclusive and representative of our communities. We have seen the growth of mixed ability rugby in our clubs and more opportunities for people with disabilities to be involved in the game, and this will include adults at risk.

Children are either associated with or can be seen in every rugby club across Wales, and there is a strong association between children and rugby in the communities we live in. Every club, hub or region must appoint a designated Club Safeguarding Officer (CSO) to be the lead contact for safeguarding within that environment. The CSO should be registered with the Welsh Rugby Union and will be required to undertake an induction process.

The community clubs and hubs across Wales play a vital role in developing the next generation of professional and community rugby players, and the involvement of children and adults are at the centre of this.

The CSO is one of the most important roles in any rugby club or hub. CSOs are responsible for co-ordinating the safeguarding and welfare of all children, young people and adults in their club. CSO's are supported by the Management Group, Committee or Board, who have ultimate responsibility for safeguarding in their club or hub.

A key component of effective safeguarding is working together, so it is extremely important that the CSO develops a positive working relationship with the senior Club Secretary and or any other senior management committee officials who have overall responsibility for safeguarding within the club.

CSOs should also work closely with Team Managers and Coaches of any under 18 sides or Mixed Ability sides within the club, who should also understand the basic principles of safeguarding through coach education or bespoke safeguarding training.

The role and responsibilities of the CSO are included in the CSO Role Description (see below)

The responsibilities of a CSO are:

- complete the CSO induction process and commit to continuous professional development.
- promote the WRU Safeguarding Policy and Procedures within the club, and ensure that the policy is available on the club website.
- promote a safe and inclusive environment to develop a safeguarding culture.
- co-ordinate and maintain compliance in relation to safe recruitment and retention of volunteers in regulated activity.
- first point of contact for anyone in the club regarding any safeguarding concerns.
- first point of contact for the Welsh Rugby Union regarding any club to manage issues.

- to manage safeguarding issues on behalf of the Club's Board or Committee, who retain overall ownership and responsibility, ensuring that the board are fully appraised of matters and able to discharge their obligations

The CSO in the Club Structure

CSOs are responsible for ensuring that the club or hub complies with their responsibilities to recruit and retain volunteers who work with children and adults at risk, who have been subject to appropriate vetting checks. They co-ordinate and manage the safe recruitment process and monitor compliance levels in line with the requirement of the club audit.

The contact details of the CSO should be known by all the coaching and management teams within the club. They should be the first point of contact for players, parents, guardians, carers and other volunteers if there are concerns about welfare, poor practice or abuse issues. It is accepted that players, parents, guardians or carers may wish to speak to the coach or another club volunteer, prior to the CSO, and in these cases the CSO must be notified as soon as possible afterwards.

The CSO is responsible for promoting the WRU Safeguarding Policy and Procedures and must ensure that a copy of the policy is available within the club.

If there is a safeguarding investigation being conducted, then the CSO will be the first point of contact for the WRU Safeguarding Team. They are not required to investigate any matters but would be required to assist in contacting potential witnesses or facilitating interviews with volunteers who may be the subject of a poor practice or discipline issues under investigation by the WRU Safeguarding Team or the Discipline Committee.

If there is a criminal or multi agency investigation then the WRU Safeguarding Team will work with the CSO and the club to assist and provide advice, and act as the conduit between the club and the agencies involved. A member of the WRU Safeguarding Team will contribute or attend if there is a strategy meeting convened under Child or Adult Protection Procedures.

The CSO's work closely with the Club Secretary and should be part of the club or hub management committee at both senior and junior level if there are separate committees. They are required to brief club or hub management officials on safeguarding matters where appropriate, and they are central to them fulfilling their responsibilities in terms of safeguarding, ensuring that there is a safe and inclusive environment for everyone.

CSO's must also ensure that they maintain confidentiality when dealing with information of a sensitive nature that need to be discussed.

They should work closely with the WRU Safeguarding Team to ensure that any concerns or issues are responded to in a professional and expeditious manner, and in line with the WRU Safeguarding Policy.

CSOs will be supported by the WRU Policy and Integrity Team, and Community Rugby Department, and will have the opportunity to develop their skills and abilities in dealing with safeguarding matters through a variety of training opportunities. When a club or hub volunteer is recruited as a CSO they will receive a digital Starter Pack from the WRU Safeguarding Team, and also receive an induction into the role.

The CSO Induction will include the following content regarding role and responsibilities –

- Responsibility to promote the WRU Safeguarding Policy and Procedures to develop a safeguarding culture in the club, hub or region.
- Ensure that the WRU Safeguarding Policy is available on the club website.
- Promote safeguarding best practice guidance to develop safe and inclusive environments
- Co-ordinate the Safe Recruitment of volunteers, maintaining compliance in accordance with the WRU Safe Recruitment Procedures.
- Recognising Poor Practice and Abuse.
- Reporting and Responding to Concerns as the first point of contact for anyone in the club regarding any safeguarding concerns.
- Report any allegations of poor practice, abuse or a concern about the welfare of a child or adult to the WRU Safeguarding Team or statutory Child Protection agencies such as the local Social Services Department or Police.
- Responsibility to make such reports without delay, it is NOT the role of the CSO to decide whether a child or adult at risk has been abused or not, this is an assessment that will be made by professional safeguarding staff.
- Responsibility to know the WRU Safeguarding Investigations and Case Management Panel Procedures.
- Promote WRU Safeguarding Training opportunities for clubs and volunteers.
- Consider Continuous Professional Development opportunities for the CSO.
- Responsibility to manage safeguarding issues on behalf of the Club's Board or Committee, who retain overall ownership and responsibility, ensuring that the board are fully appraised of matters and able to discharge their obligations.
- Promote anti-discriminatory practice. The club must ensure that it has made clear its commitment to anti-discriminatory practice in its policy, procedures and plans for safeguarding children and adults at risk.
- Ensure confidentiality is maintained in relation to any safeguarding matters.

The overarching skills that are required for the role are:

- Excellent interpersonal skills and relationship management - working effectively with others
- Database management skills
- Organised, reliable and motivated
- Good written and verbal communication skills
- Good decision making skills
- Ability to maintain confidentiality

CSO's will also have the opportunity for continuous professional development, and can access additional safeguarding training such as the WRU Don't Tackle it Alone Course

There will be other training opportunities for prospective Coaches with Safeguarding modules on Coach Development Courses. Coaches attending the Coach Development Courses will also be required to have been through the safe recruitment process and have a valid DBS certificate, prior to attending.

A young rugby player in a red jersey and headgear is running with the ball, with other players in the background. The entire image is overlaid with a semi-transparent red filter. A yellow rectangular box is centered over the image, containing the title text.

SAFEGUARDING CHILDREN

SAFEGUARDING CHILDREN

Background

The WRU acknowledges the duty to care to safeguard and promote the welfare of the child and is committed to ensuring that safeguarding practice reflects statutory responsibilities, government guidance and promotes best practice.

The Welsh Government is firmly committed to promoting children's rights and has led the way in this area. All children in Wales have rights, there are no conditions attached to them and nobody has the power to give them or take them away from children.

Children and young people have rights under the Human Rights Act 1998, but they also have rights under the United Nations Convention on the Rights of the Child (UNCRC). All Governments who have signed up to the UNCRC, including the Welsh Government, have to make sure that children, young people and adults know about and understand the UNCRC.

The link below provides more detail on Children's Rights in Wales

[https://www.gov.wales/childrens-rights-information-children#:~:text=All%20children%20in%20Wales%20have,of%20the%20Child%20\(UNCRC\).](https://www.gov.wales/childrens-rights-information-children#:~:text=All%20children%20in%20Wales%20have,of%20the%20Child%20(UNCRC).)

In Children and Young People: Rights to Action 2004 the Welsh Assembly Government established seven core aims through which it would work to ensure all children:

- have a positive start in life.
- have a comprehensive range of education and learning opportunities.
- enjoy the best possible health and are free from abuse, victimisation and exploitation.
- have access to play, leisure, sporting and cultural activities.
- are listened to, treated with respect, and have their race and cultural identity recognised.
- have a safe home and a community which supports physical and emotional wellbeing.
- are not disadvantaged by poverty.

The WRU acknowledge that it can make a significant contribution to the achievement of these outcomes for children involved in the sport. Organisations that provide services for children (defined in the Children Act 1989 as anyone under the age of 18 years) have a duty to safeguard and promote their welfare. The concept of safeguarding and promoting the welfare of children is defined within Safeguarding Children: Working Together under the Children Act 2004, (Welsh Assembly Government, 2006) as:

- Protecting children from abuse and neglect.
- Preventing impairment of their health or development.
- Ensuring that they receive safe and effective care so as to enable them to have optimum life.

Working Together under the Children Act 2004 sets out how all agencies and professionals should work in partnership to safeguard and promote children's welfare and protect them from harm.

Working practices and procedures should be adopted that minimise situations where abuse of children may occur, such as unobserved contact. It is also good practice to draw up codes of practice for coaches', parents' and children's participation in activities, and disseminate these codes of practice as widely as possible.

Safe Recruitment – Working with Children

Policy Statement

The WRU believe everyone has a responsibility to promote the welfare of all children and young people, through safe recruitment to ensure that they have the opportunity to participate in a safe and inclusive environment.

The WRU are committed to equality and anti-discriminatory practice. We will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We are also committed to recognising that some children are additionally vulnerable because of the impact of discrimination, previous experiences, their level of dependency, communication needs or other issues.

The WRU are committed to supporting clubs, hubs and regions to ensure that they have safe recruitment policies in accordance with the WRU Safeguarding Policy by:

- listening to children and respecting them.
- appointing a designated national governing body safeguarding lead for strategic matters.
- appointing a designated national governing body safeguarding lead for operational matters.
- working with Club Safeguarding Officers to develop safe and inclusive environments with the aim of developing a safeguarding culture within the game in Wales.
- appointing a Board Champion who takes responsibility for safeguarding at the highest level in the organisation.
- working with the Independent Safeguarding Advisory Group to provide external scrutiny and quality assurance, through a review process in relation to the safe recruitment process.
- safeguarding and protecting all children and young people through the implementation of robust safer recruitment practices.
- identifying and rejecting applicants who are unsuitable to work with children and young people.
- responding to concerns about the suitability of applicants during the recruitment process.
- responding to concerns about the suitability of employees and volunteers once they have begun their role.
- ensuring all new staff participate in an induction which includes child protection.
- reviewing the policy as and when required or at a minimum on a three-year cycle.

To ensure that the right people are recruited as volunteers in these important roles, any volunteers who wish to participate in rugby related activity, which involves unsupervised contact

with children or working with adults at risk, will be subject to a suitability risk assessment through the WRU Safe Recruitment procedures.

Regulated Activity – Working with Children

It is illegal for an employer to knowingly employ someone in a regulated position if they are barred from doing so. It is also an offence for the individual who has been barred to apply for a regulated position (one which involves spending regular time working with children)

Any eligible organisation recruiting for a position (paid or unpaid) that falls within the definition of regulated activity relating to children, may request an applicant to obtain an enhanced DBS Check with barred list check to help determine their suitability for the position, prior to engaging them. Eligible staff in post may also be re-checked to help confirm their ongoing suitability.

There are many different aspects of 'Regulated Activity' which relate to unsupervised contact with children. There are a number of different tasks that relate to the supervision of children in a sporting environment, and those tasks have to be completed on a regular basis as follows:

- Once a week or more.
- Three or more occasions in a period of 30 days.
- Overnight between 2.00am and 6.00am.

The tasks that relate to this are teaching, training, or instructing children. Caring, supervising or providing advice and guidance on well-being to children would also meet the criteria, and if you are providing transport specifically for children on that regular basis then this would also meet the criteria.

Who does this apply to in Welsh Rugby?

Based on the above criteria, the following roles are defined as those staff or volunteers that are required to be safely recruited through the SAFER Recruitment process (see below)

- Coaches
- Team Managers
- Medical Staff or First Aiders
- Match Officials

WRU Safe Recruitment Process for Volunteers

The WRU works in partnership with clubs, hubs and regions to ensure that there is a safe recruitment process in place and have a risk management process that considers the suitability of volunteers. This process ensures that there are appropriate and fair vetting procedures in place, based on information gathered from a number of sources, including the Disclosure and Barring Service.

The WRU operate an online DBS application process which is managed at club level by CSO's who are responsible for processing applications.

Our rugby clubs rely heavily on motivated and enthusiastic volunteers to work with children in rugby, and without them our clubs could not function. However, some individuals will try to use rugby clubs and events to gain access to children for inappropriate reasons. The WRU are committed to ensuring that there is a robust, safe and practical approach to volunteer recruitment.

Why is Safe Recruitment Important?

Safe recruitment is important as abusers will try to take advantage of poor systems and look for opportunities and gaps in the process.

It is extremely important that volunteer Club Safeguarding Officers are supported by the WRU, other volunteers, and the club committee or board to have appropriate safeguards and recruitment processes in place.

Safe Recruitment process (SAFER)

Safeguarding Statement

The WRU set high safeguarding standards, with a safe recruitment policy and process to be followed, which is robust and the WRU works closely with clubs to ensure that we have safe and inclusive environments in our clubs, hubs and regions.

The WRU are committed to supporting clubs, hubs and regions to develop a safeguarding culture within Welsh Rugby that ensures that we work together to share information, so that we recruit the right people.

Application

The safe recruitment process must include an application for the role. Clubs, Hubs and Regions must ensure that they have an application from prospective volunteers, outlining any previous experience that they have, that is relevant to the role that they are applying for.

Future

Selecting the right people is extremely important, take responsibility to conduct an effective interview for future volunteers. Question and probe appropriately with professional curiosity to ensure that we recruit the right people into the rugby family and minimise the risk of appointing someone unsuitable. It is important to ensure that there is a fair process.

Evaluate

Check things thoroughly such as pre-employment checks and gather information for the suitability risk assessment (this will be required for the DBS check) and link all information.

It is also important to maintain a culture of vigilance and support once the individual has been appointed. It is useful to conduct a Club Induction to outline the responsibilities, expected standards and club culture.

Remember Don't be a Bystander

- Look and Listen.
- Take appropriate action if volunteers or Staff don't comply with the safe recruitment process (Red Flag).
- Duty to children.
- Engagement and Education are key.
- Consequences for victims are life-long.
- Club reputational damage.

Key Points

- It is extremely important that volunteers are appropriately vetted prior to being appointed to a volunteer role in regulated activity.
- The safe recruitment process is managed by the Club Safeguarding Officer. If there is a person who wants to participate as a new volunteer, then they have to complete the process.
- DBS checks for volunteers are free, with no cost to the club or the volunteer.
- Anyone attending the Coach Development Courses will also be required to have a valid DBS certificate, prior to attending.
- If there are coaches who are under 18 years of age, although they may be suitably qualified and vetted, they should not be relied upon to have responsibility for safeguarding issues. They should be allowed to develop their sense of belonging and responsibility rather than depending upon them to take full responsibility for managing a group of children. They can only supplement the adult coaches supervising the activity.

WRU Database

It is important that accurate, reliable and up to date information is retained on the WRU database, both from a safeguarding perspective and to ensure compliance with data protection laws. The database is managed by the Club Secretary with the assistance of other nominated personnel within the club.

The Club Safeguarding Officers and Club Secretary have access to relevant data held by the club, and Team Managers have limited access to their individual teams. They do not have access to edit any information regarding children who are players, as this responsibility sits with the individual parent in line with data protection laws and online registration.

It is the responsibility of the club to ensure that all club volunteers are entered onto the database, and the information is up to date and accurate. Some of those club volunteers will require a DBS check in line with their role in the club and those will also be displayed on the safeguarding tab of the database.

Non-Regulated Activity Roles

There are many other volunteers and parents who may be involved in supporting the running of a rugby squad, and there may be a variety of tasks that volunteers will complete such as administration, collecting subscriptions, registration of players, preparing the field for play or occasionally assisting with transport duties.

In general terms those tasks do not meet the criteria for a DBS check i.e. regulated activity, and therefore they will not have to undertake a DBS check. However, there may be some who do meet this criteria even though the role would not ordinarily require a check (e.g. CSO). If you are in any doubt regarding this, please contact the WRU Safeguarding Team.

If there is a new volunteer who is a Coach, Team Manager, First Aider or Referee, the Club Safeguarding Officer the Team Manager, or Coach should notify the CSO that there is a new coach in the club and the CSO will facilitate the completion of the DBS application. It is important that this is completed as soon as possible. DBS checks are free for volunteers and are completed online.

There is further guidance available for CSOs in relation to the completion of this process and the documents that can be used to verify identity. Please contact the WRU Safeguarding Team if you have any queries

Volunteer and Club, Hub or Region - Safe Recruitment Process

The prospective volunteer has to undertake a suitability risk assessment, prior to being able to work in regulated activity, and it is mandatory that the safe recruitment process is completed. This includes a vetting and selection process, including the requirement to have an enhanced DBS check.

The volunteer will need to provide evidence and confirm their identity, and this is verified by the CSO or another nominated ID Verifier within the club i.e. Club Secretary. The DBS application will be completed by the CSO in company with that volunteer, or the information can be gathered on the ID verification form and processed by the Club Safeguarding Officer at a later stage.

The identity of the volunteer can be verified by using various personal documents such as drivers' licence, passport and utility bill etc.

The DBS application is then processed online, and this is usually completed within 5-7 days.

The WRU will be notified if the DBS certificate is cleared i.e. there are no convictions or information to suggest any risk. The applicant will receive the certificate through the post.

If there is any information on the certificate the WRU are notified by e-mail, as an In Post Notification, but they are not informed of the details of any convictions or information. If this occurs the WRU Safeguarding Manager will contact the CSO and request that a copy of the certificate is shared, and then examined, and risk assessed by the WRU.

It is the responsibility of the volunteer applicant to disclose the DBS certificate to the CSO or the WRU. The CSO can scan, photograph or photocopy the certificate and either e-mail (preferred method) or post it to the WRU Safeguarding Team for the full risk assessment to be completed.

If the volunteer does not wish to disclose the contents of the DBS certificate to the CSO then the certificate should be placed in a sealed envelope and given to the CSO, who should then post it to the WRU.

Once the risk assessment is completed and the disclosure is cleared, the WRU will update the DBS certificate number and date of issue onto the WRU database to reflect DBS compliance for that volunteer. The CSO will then be notified of this by e-mail. Only once the CSO has been informed of this clearance can the volunteer work in regulated activity with children in the club.

The CSO would be the only person in the club to have access as an ID verifier to complete online applications, but they cannot verify their own identity, or close family members. Therefore, the ID verification process would have to be completed either by a nominated officer of the club or by a WRU staff member. This is generally completed by the WRU Safeguarding Manager during the CSO induction process.

It is the responsibility of the club to ensure that all volunteers in regulated activity are appropriately registered, so that the DBS certificate details are updated.

If there is information contained on the DBS certificate that indicates that the volunteer may pose a risk to children or adults then the matter will be investigated further, with the volunteer being asked to supply further information regarding the conviction(s).

The volunteer is required to provide a letter of explanation regarding the convictions that indicate that a risk may be presented. The volunteer will also be required to provide two independent references. This will be done as confidentially as possible between the WRU Safeguarding Manager, the individual, and the CSO.

It is important that the volunteer provides accurate, detailed and reliable information regarding their convictions, so that the appropriate risk assessment can be conducted. If there is any suggestion that all of the relevant information has not been disclosed, this will be considered in any decisions taken regarding their suitability to work with children and would be considered a breach of the Safeguarding Policy and Procedures.

Once the information has been gathered, if it is necessary and proportionate to do so, further enquiries will be made with statutory agencies such as the Police so that all the relevant information can be assessed.

The matter will be considered by the WRU Safeguarding Panel who will decide upon the suitability of the volunteer to be involved in a position of regulated activity. If it is believed that temporary safeguarding measures need to be in place to mitigate the risk while the investigation is progressing, then a temporary suspension can be imposed by the panel.

There are two potential outcomes to this process in relation to the decision of the WRU Safeguarding Panel:

- The suitability risk assessment will be completed, and the disclosure cleared through the safe recruitment process, to enable the volunteer or member of staff to volunteer or work in regulated activity OR
- The panel consider that the individual does pose a risk and would therefore be excluded from working or volunteering with children

Frequency of DBS Checks and Vetting

DBS certificates should be renewed every three years, or there is a change in role or responsibility. Volunteers that have been convicted of any criminal offences during that time whilst still involved in regulated activity have a duty to self-disclose this information to the CSO and the WRU Safeguarding Manager for a further risk assessment to be conducted.

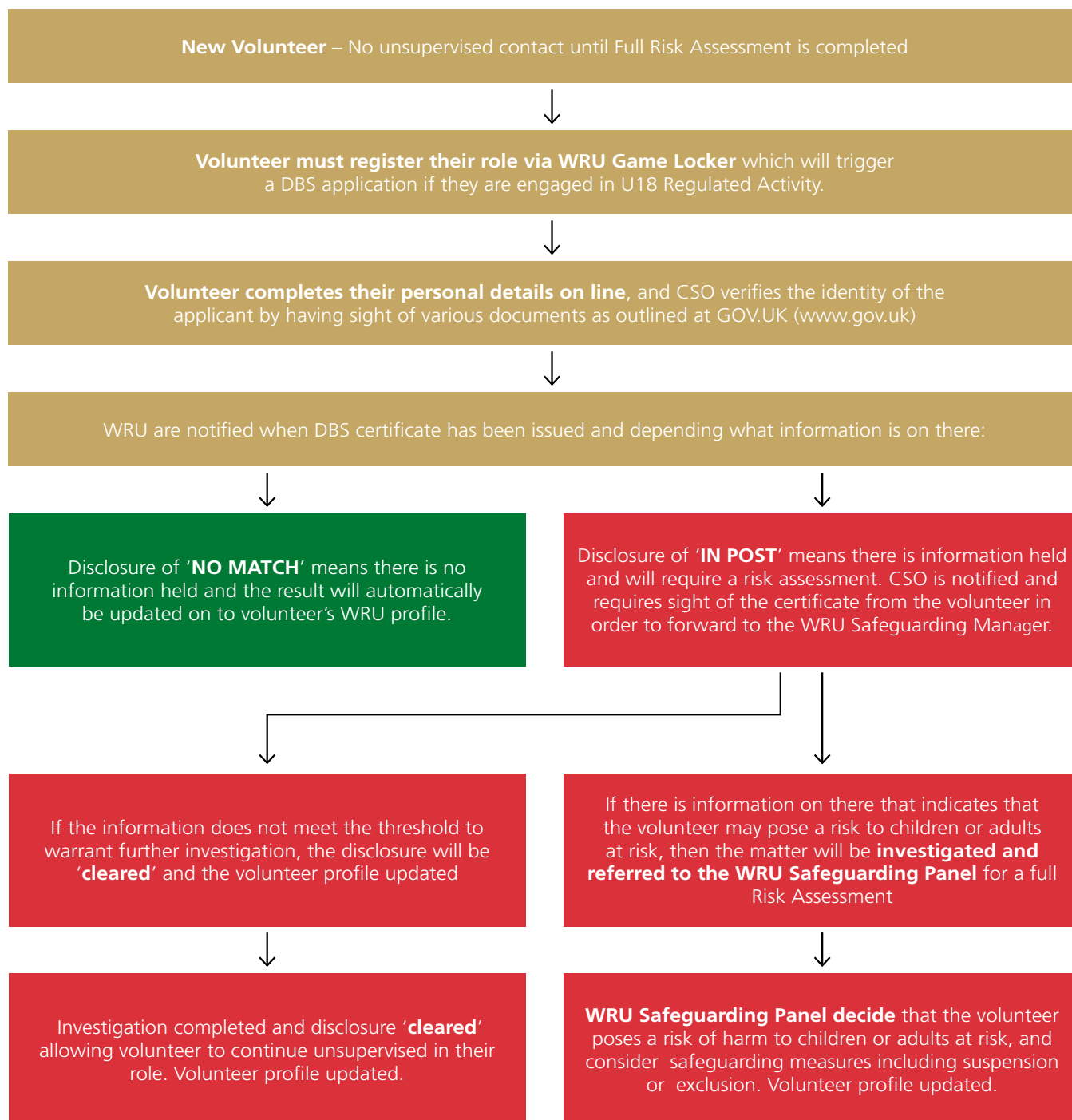
Failure to disclose such information will lead to the matter being referred to the WRU Safeguarding Panel to consider if any further action should be taken.

DBS ID Checking Guidelines

The current guidelines are on the DBS website [link below]

<https://www.gov.uk/government/publications/dbs-identity-checking-guidelines>

VOLUNTEER RECRUITMENT RISK MANAGEMENT FLOWCHART



POSITION OF TRUST

What is a Position of Trust?

Someone in a position of trust is a person in a position of authority or responsibility over another person.

Position of Trust is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children.

The age of sexual consent in the UK is 16 years of age. The law states (as of 28 June 2022) that those in a position of trust cannot legally have a sexual relationship with young people they look after, under 18 years old, and this includes Sports Coaches.

'Sport' is defined as:

1. any game in which physical skill is the predominant factor, and
2. any form of physical recreation that is also engaged in for purposes of competition or display.

The adult must be involved in coaching, teaching, training, supervising, or instructing a young person.

There is a requirement that this activity is carried out on a regular basis (Regulated Activity)

What is Good Practice?

Coaches and members of the wider coaching team involved in physical activity and sports organisations should be aware of and recognise the boundaries of what acceptable and unacceptable behaviours and situations involving those in a position of trust.

Coaches sign up to the Code of Conduct when they register on Game Locker.

Coaches must:

- maintain a positive, healthy relationship with the young people under your authority.
- maintain a relationship with all participants that is appropriate to your role.
- not seek to engage in sexual activity or sexualised communication or image-sharing (including via social media) with participants under 18 years old.

Coaches Code of Practice

Coaching is a powerful catalyst for promoting positive behaviour within any sport. Coaches have a pivotal role in creating and shaping team culture and directly contribute to the enjoyment, fulfilment and achievement of those they coach.

Working with and for people is central to the effectiveness of a coach, to develop and build positive relationships with others. Coaches have a responsibility to lead and develop a positive optimal culture, that reflects the values of their club and Welsh Rugby, and ensures that everyone thrives, and is able to reach their potential.

Coaches must be qualified, vetted and competent, and those working with children in regulated activity also have a higher responsibility, being in a Position of Trust - a position of authority or responsibility over another.

The WRU Coaches Code of Practice outline the standards of ethical and professional behaviour that are expected and required from a Coach. The WRU Coaches Code of Conduct is aligned alongside the Code of Practice, to assist coaches in developing the key principles of good coaching practice. It has been developed to help provide clarity of what good practice looks and feels like in terms of coaching behaviours. It will also summarise what poor practice looks and feels like.

Abuse of a Position of Trust

The [Child Protection in Sport Unit](#) have developed a series of resources on this subject – 'Understanding the Implications of Positions of Trust in Sport'.

The primary motivation for legislation to address the abuse of positions of trust was the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to sexual abuse and exploitation, in defined circumstances.

This includes sexual activity and relationships with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives.

The WRU will investigate any allegations and will work in collaboration with statutory agencies to investigate any potential criminal offences that may have been committed, and as such any person in a position of trust who abuses this position will also breach the WRU Codes of Conduct and the WRU Safeguarding Policy. The matter will be referred to the WRU Safeguarding Panel to consider what safeguarding measures need to be implemented and this can include permanent suspension from coaching, and a referral to the Disclosure and Barring Service to consider barring from working with children.

It must be stressed that it is always the responsibility of the adult to ensure that his or her conduct is acceptable. Appropriate boundaries in all relationships must be maintained and adults must not behave in a manner that would encourage any attraction to develop.

However, in the event that a young person displays signs of attraction to an adult in a position of trust, this must be reported to the Club Safeguarding Officer. If appropriate, the adult may need to remove themselves from this situation.

Safeguarding Children and Young People in the Community Game

The Welsh Rugby Union are committed to promoting positive, inclusive, and safe environments, and working with parents and volunteers to ensure we create a culture in which all children and young people, are able to learn, develop, and have fun through their rugby journey.

It is important that everyone involved in Welsh rugby (i.e. volunteers, coaches, parents, carers) understand their safeguarding responsibilities in relation to all the people they interact with in the rugby environment.

Coaches should create a positive, and supportive environment, so that children and young people have the opportunity to develop a range of life skills. When they are able to participate in rugby within a safe environment, they develop life skills alongside their rugby development. These skills then help them to positively contribute to society in the future, develop a love of the sport whilst also improving their physical well-being by engaging in a healthy active lifestyle.

COACH

- **Care** about What You do
- **Organisation** – Detail is Important in Everything that You do
- **Application** – Develop an Engaging, Safe and Inclusive Environment
- **Communication** - Alignment and the Whole One Club Approach - What is the Club, Hub or Regional Culture?
- **High Standards** - On and Off the Field



Managing Parents and Players Expectations

When players enter the performance pathway it is important that the expectations of players, parents and guardians are appropriately managed. There should be a clear policy in place as to how they will be managed.

Players who enter the performance pathway should receive an induction where they are briefed on what the expectations on them are, and parents and guardians should also be aware of this. The induction should also include information on selection, training, competitions, anti-doping, diet, role of sports agents, reporting concerns and safeguarding issues and other player welfare related education.

There should be regular performance reviews conducted and appropriate and relevant feedback provided at every opportunity.

It is extremely important that players who are released from the performance pathway programme are managed appropriately upon their exit. Players and parents should be provided with specific feedback and should be supported through this process along with their parents, to ensure that they are encouraged to continue playing rugby and are retained and transitioned into the community game.

Safeguarding Talented Young Athletes and the Pathway Process

There are different challenges presented for young players in a performance environment or talent pathway, and issues such as overtraining, managing injuries, social media, doping, diet, bullying and managing relationships all have the potential to raise safeguarding issues.

No young person starts off as an elite athlete – they must grow in experience, skill and confidence with the support of their coach and others.

For many young people, reaching a representative level has been their focus for a number of years, and they will have trained hard to achieve this. Parents will also have made a significant contribution to support their child's progress and success. Within competitive sport, too much early pressure can lead to burn-out and withdrawal from participating in sport.

The WRU are committed to working with staff that are involved in managing the performance pathway or similar programmes to ensure that they understand their safeguarding responsibilities, through being in a player centred, safe and positive environment for those young players to develop and thrive. Responsibility for creating a safe, player-focused environment lies with the coaching and management staff, and ultimately the Regions and the WRU.

The staff who manage and coach talented young players in pathway programmes are in a position of trust, and they have to understand the role and the responsibilities that are attached to this.

They have a responsibility to ensure that children who are identified as elite young players are appropriately safeguarded. Those young players involved in such programmes often have to work under intense pressure, in close relationships with coaches and support teams, and safeguarding issues can arise.

There are factors that can make some talented young players more vulnerable to harmful behaviours, either from themselves, their coaches or parents, or members of their entourage.

These factors include:

- a win at all costs approach.
- intense coach – player relationships,
- a self-image that is linked closely with performance excellence.
- child athletes operating in an adult-focused environment.
- being away from family and support networks.
- fear of losing funding or a place on the programme if they speak out.

These demands on the talents and time of a young person can have negative consequences on their ability to socialise with those outside the rugby environment and denial of other peer opportunities and friendships.

Training and Competition

Potentially abusive situations can arise when a high-performance coach develops training programmes and attendance at competition schedules that are focused on the goals of the sport to achieve success rather than the needs of the young person, and talented young players are vulnerable in these circumstances.

Players should be treated as an individual, and training programmes tailored to their particular development needs. It is important that those managing such programmes understand and know their players well and focus on developing the person as well as the athlete and player. They need to have empathy and manage workloads and expectations effectively.

Coaches planning training routines should consider the development of a young person as a whole to maximise their development and potential. Some key factors to consider as a coach are:

How well do you know your players? Can you read if they are having a good or bad day and flex your session to meet their needs.

- Where are they currently in relation to their goals?
- Rates of development are different and needs to be acknowledged when planning any sessions.
- Are the sessions challenging or not challenging enough? The aim is to find the sweet spot.
- Are we providing a psychologically safe environment? Do players feel comfortable to be themselves and push themselves without fear of failure.
- The vulnerability of young people participating in elite-level sport.
- The impact that elite-level sport may be having on the child's development.

Rugby Union is a sport that has physical requirements. Added to this, as a young player progresses through the pathway the level of physicality in games increases. However, too much emphasis on physical conditioning within any session will have a negative impact on a child's social and physiological development.

Potentially abusive situations can arise when a coach develops training programmes and competition schedules that are focused on the goals of the sport rather than the needs of the young person.

This may include:

- a training schedule that requires travelling long distances.
- the frequency of the training, what times training occurs and length of training sessions.
- representing the sport in regional or district competitions balanced with club or school commitments.
- being forced to play above their age group.

Managing Player Demand

Young players who progress through the pathway will have heightened demand on their playing and training time. It is essential that all stakeholders plan and manage this accordingly. This is due to the fact that a young player competing in too many games and tournaments that are close together, or being exposed to excessive training requirements, can be at a physical risk because of a shortened recovery time.

These situations need to be managed effectively and ensure that the demand upon the child both physically and mentally is not excessive.

It is important that players workloads are appropriately managed, and they have time to train and not just compete. It is the responsibility of those adults who have a duty of care to the child to ensure that there are sufficient periods of rest to enable recovery, regeneration and growth.

As talented young players progress through the pathway strength and conditioning training becomes more prevalent, the welfare of the individual must be the primary focus. There is a need to development their strength and conditioning to equip them with the physical attributes for the modern game at the elite level. However, strength and conditioning should not be viewed as simply an addition to an overall training and competition programme for a child, but rather as a key factor in long-term athletic development.

The Regional Age Grade programme will very often see players playing above their age group, and similarly players in the Regional Academies may also be required to play in senior rugby prior to their eighteenth birthday. The Coaching Staff will conduct an assessment based on the player's maturity in terms of their physical and cognitive development.

Academy players who are considered to play in senior rugby will also be subject to this process, and there is also a need for agreement between the Academy Manager, parents and player. It is important that collective decisions are made in the best interests of the athlete with his/her welfare and development being the paramount consideration.

The demands on a young person can have negative consequences on their ability to socialise outside of the rugby environment and leave little time for other peer opportunities and friendships, so it is extremely important to consider it as the development of not only a player and athlete, but also as a person. There is a need to have a holistic approach to developing young athletes, as investment in the person will benefit their overall player development, and ability to perform in a team environment.

Managing Relationships and Boundaries

Coaches are in a position of trust, and due to the culture of sport, this may create a situation where the coach is allowed to facilitate power, obedience and potentially the rationalisation of abuse which can be more prevalent at the elite level. This abuse can take the form of inappropriate relationships or even illegal sexual contact.

Elite athletes spend a significant amount of time alone with their coach who is often involved in other areas of the athlete's life as well.

In a performance environment it is extremely important that coaches are appropriately qualified and experienced in managing the unique challenges and vulnerabilities associated with safeguarding elite young athletes and understanding the importance of a player-focused environment.

Staff who are working with children in a performance environment must also be appropriately qualified, vetted and competent.

Coaches need to ensure that personal behavioural boundaries are not crossed. Examples of this include unsupervised social outings, inappropriate social media contact, the use of inappropriate messaging or sharing inappropriate photographs on social media, inappropriate conversations in person or via phone and highly personal conversations that were irrelevant to the athlete's participation in sport. These activities can present a safeguarding risk.

Regional Age Grade and Academy Coaches need to ensure that they fully understand their responsibilities and manage those boundaries effectively. They need to be able to drive high standards of behaviour and performance within the elite pathway environment. It is important to understand the needs of the players, and also manage their workload appropriately.

Regular dialogue with the players and parents is key to building relationships. Coaches should provide feedback to players on a regular basis to drive and improve their performance. However, it is equally important that these open and honest discussions are conducted in the right manner, with the interests of the player the primary concern.

Coaches also need to understand how injuries, and particularly long-term injury can affect players mental well-being. For young athletes this can be viewed as a real issue and can have serious consequences. Many suffer anxiety, as they know that they are competing for places and looking to secure a contract. Parents and Academy Staff have a critical role in supporting players as many will feel isolated in this situation.

Players also need to be managed effectively when returning to play after injury, and coaches need to be aware of the balance of power in situations such as this. It should be a collective

Doping

Doping within Welsh Rugby is also a safeguarding and child protection issue if it involves children or young people. It is important to identify high risk players and situations and pro-actively work with the WRU Integrity Team to raise awareness of these issues.

The WRU work closely with UK Anti-Doping to educate players, coaches, support staff, medical teams and also importantly parents and guardians to have a basic level of understanding about anti-doping, in terms of both performance enhancing and recreational drugs. This is promoted through the 'STAY ONSIDE' programme.

The WRU has a comprehensive anti-doping education programme for those players on the performance pathway. These players will be provided with the appropriate advice, guidance and education around nutrition and the use of supplements and managing any medications through the use of the Global Drugs Reference Online tool.

The WRU advocate a 'food first' approach, and a focus on players getting their daily eating right to improve performance and reach their goals. To maximise their athletic potential, players should ensure that they have a solid foundation to underpin this through the Six Pillars:

- Healthy and balanced diet.
- Good hydration habits.
- Effective injury prevention strategies.
- Appropriate rest and recovery.
- Mental focus skills.
- Effective training programme.

In terms of diet, it is vitally important that there is clear messaging from performance staff around what is acceptable and what is unacceptable. Messages and conversations around issues such as weight gain or loss needs to be appropriately managed through professional nutritional guidance. It is not acceptable to apply or exert pressure on elite young athletes about such issues, as this can very often lead to unacceptable practice or even a risk of doping.

Please see the [WRU Anti-Doping Protocol and Guidance for further information](https://community.wru.wales/governance/policy-and-integrity/anti-doping/)

<https://community.wru.wales/governance/policy-and-integrity/anti-doping/>



What can Players do to Safeguard Themselves?

All players have the right to enjoy sport, free from all forms of abuse and exploitation, and to be involved in decisions affecting them.

There are lots of things that players can do, and be involved in, to help promote their own welfare and safety. These include:

- Know their rights and responsibilities.
- Athletes will have responsibilities to comply with the WRU Code of Conduct, and also those related to specific areas such as anti-doping. Athletes' rights and options should be made clear to them.
- Be familiar with the WRU Safeguarding Policy and Procedures and Coaches Code of Practice.
- These resources will have information about what players can expect the organisation to do to look after their well-being, and what is expected of the individual and other people such as parents and coaches.
- Know how to raise any concerns.
- It's important that athletes can talk to someone they trust if they have concerns about anything that might be happening to them, or anyone else, in or outside of their sport, this could include abuse, harassment and bullying.
- Players should also consider what support systems are in place among and beyond their entourage members (family, friends, teachers and/or coaches).
- Ask for support as they transition through the system.
- Transitions can involve entering top-level sport, moving from junior to senior ranks, deselection, appeals, and leaving top-level sport.
- Transitions can be really hard; support should be provided to help players navigate through the process. There should be inductions that provide information about how the system operates and what support is available. This should be part of a continuous conversation about the individual's sport and life after top-level sport.
- Seek opportunities to become a voice for player welfare.
- Look for opportunities to get involved and become a voice in decision-making about player welfare and protection. The WRU have mechanisms in place to consult children, young people and parents as part of their reviews of safeguarding policies and practices.
- Support their peers.
- Supporting peers by encouraging and helping them to speak out if they witness or have any concerns about their own or anyone else's welfare.

Bullying

The WRU are committed to supporting clubs in dealing with bullying issues through appropriate advice and guidance but believe that swift local resolution is the most effective approach in dealing with such matters. The matter should be reported to the WRU but must be investigated and managed by the club, and if appropriate dealt with as an internal matter, unless the concern reaches the threshold for statutory agency intervention.

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children and adults at risk, to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm).

The Department for Children, Schools and Families says bullying is:

‘Behaviour by an individual or group usually repeated over time, that intentionally hurts another individual or group either physically or emotionally’.

Whether it be in a domestic environment, school or workplace of sports setting bullying can be–

- Physical – hitting, kicking, pushing, pinching, unwanted physical contact and taking things.
- Verbal – name calling, racial taunts, sexual comments, making offensive remarks, sarcasm, persistent teasing and emotional torment through ridicule, humiliation.
- Indirect – spreading rumours, excluding from social groups, sending malicious text messages, posting of derogatory or abusive comments, graffiti, videos or images on social network sites.
- Discriminatory behaviour or prejudicial attitudes.

There are a number of signs that may indicate that a young person or adult at risk is being bullied:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go to training or sports clubs.
- A drop off in the performance or standard of play.
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes and bingeing for example on food, cigarettes or alcohol..
- A shortage of money or frequent loss of possessions.

Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons – being overweight, physically small, having a disability or belonging to a different race, faith or culture, where it is difficult for those bullied to defend themselves.

People who bully others behave like this for a variety of different reasons and may in some cases have been abused. Typically, bullies can have low self-esteem, be excitable, aggressive and jealous. Crucially, they have learned how to gain power over others and there is increasing evidence to suggest that this abuse of power can lead to crime.

All forms of bullying are unacceptable and will not be tolerated. Bullying can include online as well as offline behaviour. The provision of an open environment where people are encouraged to report any bullying concerns is vital in tackling this problem.

People who have been bullied will often benefit from ongoing support to deal with the impact. As well as support from the CSO, victims of bullying can benefit from peer support. It is important that parents/carers are involved as they are likely to be a key source of support. The

club may consider holding a reconciliation meeting to help address the issues between the bully and the bullied person.

The competitive nature of sport makes it an ideal environment for the bully, and these are some examples:

- A parent who pushes too hard.
- A coach who adopts a win-at-all-costs philosophy.
- A player who intimidates inappropriately.
- An official who places unfair pressure on a person.

Anti-Bullying Policy

The club or organisation will:

- Recognise its duty of care and responsibility to safeguard all participants from harm.
- Promote and implement an anti-bullying policy in addition to the WRU Safeguarding Policy and procedures.
- Seek to ensure that bullying behaviour is not accepted or condoned and take any allegations seriously.
- Require all members of the club/organisation to be given information about, and sign up to, the anti-bullying policy.
- Take action to investigate and respond to any alleged incidents of bullying.
- Encourage and facilitate people to play an active part in developing and adopting a code of conduct to address bullying.
- Ensure that coaches are given access to information, guidance and/or training on bullying.

Each participant, coach, volunteer and official will:

- Respect every child and adults at risk's need for, and rights to a safe and positive environment where security, praise, recognition and opportunity for taking responsibility are available.
- Respect the feelings and views of others.
- Recognise that everyone is important and that our differences make each of us special and should be valued.
- Ensure safety by having rules and practices carefully explained and displayed for all to see.
- Report incidents of bullying they see – by doing nothing you are condoning it.

Responding to an allegation of bullying:

- Take all allegations of bullying very seriously and make a commitment to address those issues.
- Support the person and encourage them to speak about their concerns and tell the person in charge or someone in authority.
- Establish what they want from the investigation.
- Investigate all allegations and take action to ensure the victim is safe.

- Speak with the victim and the bully separately.
- Reassure the victim that you can be trusted and will help them, although you cannot promise total confidentiality.
- Keep records of what is said (what happened, by whom, when)
- Talk to the victim's parents.
- Report any concerns to the Club Safeguarding Officer.

Hazing, Initiation and Ceremonies

Hazing refers to any activity expected of someone on joining a group, or maintaining status in a group, that humiliates, degrades or risks emotional and/or physical harm, regardless of the person's willingness to participate. Hazing is known to exist in schools, universities and in sports environments. In a rugby environment these are often referred to as initiation ceremonies.

Clubs, Hubs and Regions need to be aware it, and agree on standards of behaviour with players, volunteers and staff. It is important that everyone understands and agree on what is appropriate and inappropriate behaviour, in their particular environment, as this will vary between groups. Typical hazing activities include sleep deprivation, personal servitude, binge drinking, being forced to wear embarrassing attire, and carry out dangerous stunts.

These are issues that should generally be managed by the club, hub, region or other bodies such as universities and schools. However in the most serious cases, where there is a concern that reaches the threshold for statutory agency intervention it may result in the WRU working with partners to investigate the matter as a safeguarding concern.

Online, E-Communication and Bullying

Children and young people may become targets of online bullying. Like other forms of bullying, this can seriously impact on the health, well-being, and self-confidence of those targeted. It may have a significant impact not only on the person being bullied, but on their home and work life too.

Children and young people should take steps to ensure their personal information is safe and secure. This can be managed effectively by regularly reviewing their online privacy settings and only share information with friends known to them.

Everyone should respect the feelings of others online. They should never post personal information, including pictures, about others without consent. They should not forward online content to others where it might be upsetting, hurtful or embarrassing. If they are asked to remove information that they have posted, they should do so.

Children and young people also need to recognise how they may become part of the abuse and may escalate the problem by 'liking' comments made, or taking sides when there are disputes which may lead to bullying online. It is important to respect other people's privacy and ensure that you don't become part of the problem as a member of the bullying group.

Everyone should take action and be responsible in order to prevent online harassment, abuse and bullying of others. There are strategies that can be employed to stop the bully contacting you on social networks, mobile phones, instant messaging and even games consoles. As

mentioned previously it is important that people check out the privacy or safety settings of the service you are using. You can also ring up your service provider or network provider who can help you block the abuse.

Make sure that for any account you have, you have a password that you don't share with anyone. This will mean people can't access your account and steal any information, pictures or personal data or pretend to be you. Change your password regularly.

If there is an issue in relation to online bullying, it is important to ensure that you keep the evidence by saving or copying any abusive texts or conversations, to assist in investigating any such issues.

Children and young people should remember that when accepting someone as a friend on instant messaging or social networks, that person can then access information and pictures they have posted so they should ensure they are happy for them to see this information before accepting or adding them.

Any online bullying should be reported to an adult that you trust. It may be abusive or threatening comments, a text message, online chats or group bullying, it is still bullying and is not acceptable. It is important to support people who are being bullied.

If you have blocked the person but it is still continuing, all social networks have report abuse buttons, as do most mobile phone networks who have teams to deal with abuse. Games consoles also have advice on their websites. All service providers have a duty to make sure their users feel safe.

Don't reply or answer back, and don't become a cyber-bully yourself, deal with the bully by blocking and reporting the abuse. It is sometimes hard not to write back, but it is always best to ignore, block and monitor the situation.

Check the privacy settings which will allow you to choose what information you share with people. Don't ever share where you live, your telephone number or email address with online friends.

Discriminatory Language and Behaviour

Discrimination exists within sport, some of it in plain sight. There needs to be a safe and inclusive environment which in turn will develop a positive inclusive culture within rugby union in Wales, to ensure that participants will not be discriminated against. It is clear within society, as well as sport, that some kinds of discrimination have greater consequences than others.

The WRU are clear that all forms of discrimination are not acceptable, and contrary to the values of Welsh Rugby.

The competitive nature of sport makes it an ideal environment for bullying; however, rugby union has a great reputation as a team sport with strong values and it is vitally important that there is a zero-tolerance approach to bullying. We all have a responsibility to stamp out discriminatory behaviours, practices and cultures.

It is crucial to understand the damage language and words can do to a person. In sport there are various levels of 'banter' which can go from mild to harsh, but for clarity it is not on the same scale as bullying.

Banter is something that most teams engage in; bullying is not. Banter is a form of gentle ribbing by friends, colleagues and teammates; it is episodic (i.e. irregular), never intended to cause harm and, importantly, reciprocal.

Bullying, by contrast, is subtly relentless, intentionally wounding and one directional. Banter can never be used as an excuse for bullying behaviour, and it is important to recognise that for some, banter is a route into bullying. Therefore, boundaries need to be set and upheld. While there is greater understanding of this than previously, the system is far from perfect.

WRU EDI Policy which can be accessed on the WRU website.

Child Sexual Exploitation (Grooming)

The majority of adults working with children in rugby are committed to providing an enjoyable and safe environment in which to participate. However, there may be a small proportion who have ulterior motives.

Sexual abuse of children is the result of premeditated actions that are carefully planned. Sections 14 and 15 of the Sexual Offences Act 2003 relate to offences of grooming children with the intention to commit a sexual offence. The dictionary definition of grooming is 'the criminal activity of becoming friends with a child, especially over the internet, in order to try to persuade the child to have a sexual relationship with you'.

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status.

The manipulation or 'grooming' process involves befriending children and gaining their trust, often providing them with drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options.

It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

Child sexual exploitation can manifest itself in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods, but not always. Exploitation can also involve opportunistic or organised networks of perpetrators who may profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

It is important to understand how an abuser can 'groom' a club or parents or a child by appearing trustworthy and helpful, therefore giving the impression that they can take responsibility for a young person(s).

Research demonstrates that a child is likely to be abused by someone they know and who is likely to be in a position of trust with a child.

Technology is widely used by perpetrators as a method of grooming and coercing victims, often through social networking sites and mobile devices. This form of abuse usually occurs in private, or in semi-public places such as parks, cinemas, cafes and hotels.

Sexual exploitation in sport can very often be developed over a period of time, where adult volunteers who have influence over children that they coach or manage, groom them with the intention of committing a sexual offence. It is important that adult volunteers develop healthy, transparent and positive relationships with children and that they do not put themselves in a position where they may be compromised.

Recognising Poor Practice and Abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Staff and volunteers in sport, are not experts at such recognition. However, they do have responsibility to act if they have any concerns about the behaviour of someone.

The WRU encourage employees and volunteers to report any concerns that they have to the Club Safeguarding Officer or directly to the WRU Safeguarding Team. If there is a serious concern that a child may be at immediate risk, then the matter should be reported directly to the Police.

It is not the responsibility of staff, coaches or volunteers to decide whether or not abuse is occurring. Their role is to follow procedures and forward any information or concerns to the appropriate contact, who will then deal with the other agencies involved to determine whether abuse has taken place i.e. Social Services or Police.

The Welsh Rugby Union are committed to ensuring that children and young people have the opportunity to develop in such an environment. We have a proactive safeguarding approach that aims to develop and evolve our strategies and continually drive standards to protect children and young people involved in Welsh rugby.

However, if incidents of abuse are reported, the Welsh Rugby Union are also committed to supporting children and young people, and families to ensure that any investigations are conducted in a professional and expeditious manner.

The sustained abuse of children physically, emotionally, sexually or through neglect can have major long-term effects on all aspects of a child's health, development and well-being. Sustained abuse is likely to have a deep impact on the child's self-image and self-esteem, and on their future life. Difficulties may extend into adulthood: the experience of long-term abuse may lead to difficulties in forming or sustaining close relationships, establishing oneself in the workforce, and to extra difficulties in developing the attitudes and skills needed to be an effective parent.

Any potentially abusive incident has to be seen in context to assess the extent of harm to a child and appropriate intervention. Often, it is the interaction between a number of factors that serve to increase the likelihood or level of actual significant harm.

For every child and family, there may be factors that aggravate the harm caused to the child, and those that protect against harm. Relevant factors include the individual child's means of coping and adapting, support from a family and social network, and the impact of any interventions.

The effects on a child are also influenced by the quality of the family environment at the time of abuse, and subsequent life events. An important point, sometimes overlooked, is that the way in which professionals respond has a significant bearing on subsequent outcomes.

It is important that children feel confident about their involvement in rugby and have the opportunity to enhance and develop their skills and abilities not only as an athlete but also as a person. It is equally important that sports organisations are able to gain the trust of parents and guardians in knowing that their children are involved in a safe and positive sporting environment.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child. The following are examples of physical abuse in a rugby environment relate to Coaches, Managers or other volunteers:

- exposing young players to exercise or training which disregards the capacity of their immature and growing body.
- exposing young players to overplaying, over training or fatigue.
- exposing young players to alcohol, or giving them the opportunity to drink alcohol below the legal age.
- exposing young players to performance enhancing drugs and recommending that they take them.
- exposing young players to recreational drugs.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve causing a child to frequently feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may also occur on its own.

The following are examples of emotional abuse in a rugby environment:

- Humiliating children or doing so in front of others.
- Providing repeated unbalanced negative feedback.
- Repeatedly ignoring a young player's efforts to progress.
- Repeatedly demanding performance levels above those of which the young player is capable.
- Over emphasis on winning and not enough on development.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts.

They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. The following are examples of how sexual abuse can manifest itself within a rugby environment:

- Developing or encouraging inappropriate relationships between adults and children.
- Inappropriate use of social media by grooming children.
- Inappropriate touching of children.
- The close proximity of coaches and others, to young people provides opportunities for potential abusers to exploit their position of trust to sexually abuse.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may also occur during pregnancy as a result of maternal substance abuse.

Neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment. It may also include the failure to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In a rugby situation neglect may occur when:

- young players are left alone without proper supervision.
- young players are exposed to unnecessary heat or cold without fluids or protection.
- young players are exposed to an unacceptable risk of injury.

Effects of Abuse

- Low self-esteem
- Developmental delay – physical, emotionally and mentally.
- School related problems.
- Difficulty in forming relationships as adults.
- Behavioural difficulties, such as aggression or anger.
- Permanent or temporary injury.
- Pain or distress.
- Sometimes, if untreated, abusive relationships with own (or other) children.
- Depression, self-harm – sometimes leading to suicide.
- Fatality.

Factors that increase the likelihood of Risk

- Young children that may have difficulty in telling others.
- Disabled children who may have difficulty communicating or accessing others to tell.
- Children who have already experienced abuse.
- Poor relationship between children and parent/carer.
- High levels of stress.
- History of violence in the family.
- A high dependency on the coach for sporting success.

Indicators of Abuse

Children and young people are unlikely to reveal that they are being abused. This is why it is essential that all recognise signs or symptoms of abuse taking place. However, symptoms can be the result of a combination of different types of abuse that is occurring. The following highlights examples of signs of child abuse, however this list is not exhaustive:

Physical Signs of Neglect

- Hunger- sometimes begging or stealing food from other children or searching through waste or bins.
- Clothing- Inappropriately dressed.
- Appearance- Unkempt, dirty or smelling.
- Loss of weight or constantly underweight.
- Regularly looking tired or uncared for.

Behavioural Signs of Neglect

- Regularly on their own or may have few friends.
- Regularly feeling tired.
- Failing to attend hospital or medical appointments.
- Left alone and unsupervised on a regular basis.
- Regularly late for school or absent from school.

Signs of Physical Abuse

- Unexplained bruising, marks or injuries.
- Bruises which indicate 'hand marks'.
- Cigarette burns.
- Bite marks.
- Broken bones.
- Scalds.

Behavioural Signs of Physical Abuse

- Fear of parent being contacted.
- Aggressive or angry outbursts.
- Running away.
- Fear of going home.
- Flinching.
- Depression.
- Keeping bruises or marks covered.
- Reluctance to change clothes.
- Withdrawn and/or remote behaviour.

Physical Signs of Sexual Abuse

- Bruising or bleeding near the genital area.
- Pain or itching in the genital area.
- Having a sexually transmitted disease.
- Vaginal discharge or infection.
- Stomach pains.
- Discomfort when walking or sitting down.
- Pregnancy.

Behavioural Signs of Sexual Abuse

- Sudden or unexplained changes in behaviour.
- Running away from home.
- Sexualised behaviour (knowledge beyond their age/ development).
- Self-harming.
- Keeping secrets.
- Abusing substances, alcohol or drugs.
- Unexplained source of money.
- Diet problems.
- Fear of someone.
- Not being allowed to have friends.

**These indicators should be considered as part of a pattern of behaviour (in isolation there may be explanations for each)*

Physical Signs of Emotional Abuse

- Failure to thrive or grow, particularly if the child puts weight on in other circumstances..
- Speech disorder.
- Developmental delay in relation to emotional or physical progress.

Behavioural Signs of Emotional Abuse

- Fear of making mistakes.
- Speech disorder.
- Fear of parents or other adults being contacted.
- Self-harm.
- Unwilling to take part in activities or get involved with others.

Physical Signs of Bullying

- Short of money.
- Damaged clothes.
- Loss of possessions.
- Regularly tired.
- Stomach aches or headaches.
- Visible bruising, marks or injuries.

Behavioural Signs of Bullying

- Withdrawn or depressed..
- Insecure
- Struggles to concentrate.
- Reluctance to attend school or training.
- Fear or avoidance of a particular individual or group.
- Mood changes.
- Drop in performance at school or sport.

Identifying Significant Harm

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in order to protect children. Significant harm is defined in the legislation as ill treatment or the impairment of health and development. It describes the effects of sexual, physical and emotional abuse or neglect, or a combination of different types.

Local authorities have a statutory duty under the Children Act 1989 to make enquiries, or cause enquiries to be made, where they have reasonable cause to suspect that a child who lives, or is found in their area is suffering, or likely to suffer, significant harm.

There are no absolute criteria on which to rely when judging what constitutes significant harm. A single, serious event of abuse, such as an incident of sexual abuse or violent assault, might be the cause of significant harm to a child. However, more frequently significant harm occurs as a result of a long-standing compilation of events, which interrupt, change or damage a child's physical and psychological development.

The significant harm resulting from the corrosive effect of long-term abuse is likely to have a profound impact on the future outcomes for the child. At the time of referral it might not be clear whether a child is in need or is suffering significant harm. The initial assessment should ensure that sufficient information is obtained by social services to make a judgement about the nature of the need and/or harm and what action is required.

This requires the sharing of information between agencies, structured assessment and analysis, including taking into account the child's own view about his/her circumstances according to his/her age and understanding. A good assessment is an essential basis for deciding what the concerns are for the child; what needs to change; and which services and interventions are needed to achieve the planned changes.

To understand and establish significant harm, it is necessary to consider:

- The family context.
- The child's development within the context of their family and wider social and cultural environment.
- Any special needs, such as medical conditions, communication difficulties or disabilities that may affect the child's development and care within the family.
- The nature of harm, in terms of ill treatment or the failure to provide adequate care
- The impact on the child's health and development.
- The adequacy of parental care.

Reporting and Responding – Don't be a Bystander

This section of the policy sets out the necessary procedures and minimum standards to follow for Welsh Rugby Union employees or volunteers when allegations of abuse or poor practice are reported involving children.

The WRU assures all employees and volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports their concern that a child may be subject of abuse.

The WRU are committed to ensuring that in any safeguarding disciplinary investigations involving children, that the welfare of the child remains paramount, and that there is a child centred approach.

Everyone has a legal and moral responsibility to respond to any concerns, irrespective of whether the cause of the concern is internal or external, and to ensure that they take action by reporting this in line with the WRU's procedures.

Even if the incident has occurred outside a sporting environment, the WRU Safeguarding Team must be notified. If the allegation relates to a rugby volunteer who is subject to an investigation, this may indicate a risk to children within the sport.

In some cases, sharing a concern will not trigger an investigation, but may help to build up a picture, along with information from other sources, which suggests that a person may be suffering abuse or harm.

There may be an occasion when a child approaches an individual (CSO, Coach, Volunteer etc.) and indicates that they are being abused. In such instances, it is vital that appropriate and immediate action is taken.

It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be, abusing a child, will raise concerns among other staff or volunteers. This includes the difficulties inherent in reporting such matters. If any person has knowledge, concerns or suspicions that a person is suffering, has suffered or is likely to be at risk of harm, it is their

responsibility to ensure that the concerns are referred to Social Services or the Police, who have the statutory duties and powers to make enquiries and intervene when necessary.

People who are being abused will only tell people about this, that they trust, or who they feel safe with. Coaches can very often be in this position of trust, and have a close relationship with a child or adult that they coach. They may see the coach or other volunteer as a person who they can trust and confide in. It is important that all volunteers and coaches in particular have an understanding of what to do if this happens.

It is recommended that all volunteers or staff who are in a position of trust attend Safeguarding Training with the WRU. If you require such training please contact the WRU Policy and Integrity Team.

Regardless of how concerns may have arisen, the person who received the disclosure or witnessed an incident must ensure the information is reported.

They must not allow personal opinions regarding the credibility of any individual, or the information they have received, to prevent them from making the referral. They should not worry that they may be mistaken, as the responsibility to make the assessment of the concern rests with the statutory agencies.

It is extremely important that people are not bystanders when it comes to reporting concerns. The 'bystander' effect has been a prominent issue in some cases of non-recent abuse reported within the sport sector. It is clear that in some of these cases there was a level of suspicion about behaviours which constituted a potential risk to children.

The role of the 'bystander' plays an important part in the prevention of sexual abuse and in reducing risk. The role is not confined to reporting concerns after abuse may have occurred, but more importantly intervening to challenge thinking and behaviour in order to prevent abuse occurring.

This can happen where people operate in an environment, where they are equipped and supported to intervene, and be proactive agents to prevent abuse occurring.

How Abuse may be Reported - Children

Abuse concerns can arise in many different situations and contexts. It is not the role of anyone within the sport to investigate possible concerns of abuse but it is essential that all staff and volunteers clearly understand the action that must be taken in the event of:

- A direct disclosure of abuse from a child or young person.
- A direct disclosure of abuse from an adult at risk or person involved in their care.
- A disclosure from an adult of abuse that occurred during their childhood (historical abuse).
- Observed abuse, neglect or poor practice.
- Observed concerning changes in behaviour, appearance or relationships, or other possible indicators of abuse.
- A report from a third party (e.g. another young person or adult within the club) or via an external organisation.

Child Protection concerns may arise from:

- Behaviour or experiences within the sports organisation or environment (e.g. allegations of abuse by a coach).
- Allegations arising outside the organisation (e.g. allegations of abuse at home, school or care setting).

The following procedures outline the steps that should be taken and provides guidance on sharing relevant information with Social Services and/or Police and other relevant organisations without delay and within agreed protocols.

Who to Report to?

In the event that abuse or harm is suspected, the following action should be taken:

- Report your concern immediately to the Club Safeguarding Officer.
- Report the concern immediately to the WRU Safeguarding Team.
- The CSO or the WRU Safeguarding Manager must refer the matter without delay to Social Services and/or the Police. If the CSO takes this step they must also inform the WRU
- If a child or adult is in immediate risk and action needs to be taken urgently, a 999 call must be made to the Police.

Who else Needs to Know?

The parent or guardian will be informed at the earliest opportunity, unless this is inconsistent with the need to ensure the victim's safety, but advice should be sought from Social Services as to what information should be provided to parents, by whom and when

In the event that there is any uncertainty as to whether a referral is appropriate, the NSPCC 24-hour helpline or Social Services will be able to offer advice on what action to take

In the case of non-recent abuse, disclosures must still be reported to Social Services and Police, as above, as the perpetrator may continue to present a risk to other children or adults at risk.

It is important that any information that has been disclosed remains confidential and should only be discussed with people who need to know.

Responding and Recording Information – The Six R's

Volunteers or Staff who have to deal with disclosures of abuse should consider the 'Six R's as a guide of what to do:

- RECOGNISE signs or indicators of abuse.
- REASSURE the child or adult involved.
- RECORD what is said, but don't ask questions unless you need to clarify something, and then use 5WH and an open questioning style (Who, What, Where, When, Why and How).
- REPORT or REFER to the appropriate person i.e. Police, Social Services or if appropriate the WRU Safeguarding Team.
- RETAIN any notes or materials that you have gathered.
- REMEMBER TO DO THE RIGHT THING.



If a child discloses that they or another child is being abused, the person receiving the information should:

- Identify if someone is injured or, and if so take immediate action by seeking help i.e. contacting the Police or Ambulance.
- Stay calm and ensure that the child feels safe, particularly if there is an immediate risk presented.
- Show the child that you have heard what they are saying, and that you take their allegations seriously.
- Reassure them that they've done nothing wrong.
- Allow the person to talk freely, and use their own words, but do not probe for more information than is offered as this may affect any subsequent investigation by Police and/or Social Services.

- Don't interrupt when they are recalling significant events.
- Active Listening is key. Don't make them repeat their account of what happened, unless you need to clarify something.
- Recognise any difficulties they may have in explaining the incidents.
- Reassure the person that they have done the right thing in talking about this, and disclosing the information.
- Explain what actions you must take, in a way that is appropriate to the age and understanding of the person.
- Do not promise to keep what you have been told secret or confidential, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust.
- Collect relevant facts and appropriate information.
- Make a written record of the concern including what was said using the person's own words, and do this as soon as possible.
- Maintain confidentiality if appropriate and only tell those people that need to know i.e. CSO
- If the person indicates that they do not wish others to be informed about the allegations, it is important to sensitively explain why you need to share the information, it is important to be honest in your approach.

Recording Information

Concerns about child abuse can arise in many different contexts, including when a person is already known to Social Services. Concerns can and should be shared with them through a referral. While concerns will not necessarily trigger an investigation, they help to build up a picture, along with concerns from other sources, which suggests that a child may be suffering harm.

Accurate, concise and clear record keeping in straightforward language is an essential part of an individual employee and professional's accountability towards people using their services, and underpins good child and adult protection.

Many local authorities have developed protocols establishing arrangements for conducting initial assessments by local services and defining the circumstances and thresholds under which a child should be referred to social services.

Referrals should be made to Social Services as soon as a problem, suspicion or concern about a child or adult becomes apparent, and certainly within 24 hours.

Outside office hours, referrals should be made to the Social Services emergency duty team or the Police. Social Services and the Police must ensure that an appropriate level and deployment of trained staff are available to undertake child protection section 47 enquiries, including out of hours.

The report can be made via e-mail to the WRU Policy and Integrity Team via the Integrity Mailbox integrity@wru.wales and should be marked as confidential. The referral should contain personal information and an incident report including the following information :

Personal Information – Victim

Name of the Club	Date of birth or age of the person
Time and Date of Incident	Address and Contact details
Name of the Child	Ethnicity
Name of the Parent, Guardian, Carer and contact details	Any additional needs of the person

Person Subject of Concern (PSC)

Name of the Person	Address and Contact details
Date of birth or age of the person	Ethnicity
Role	

Incident Report

Brief details of what occurred/ allegation made and any background knowledge	Any background knowledge that you may have regarding the child or adult at risk (additional needs etc.)
Description of any visible injuries	Actions taken to date and any external agencies informed
Any observed changes in the child or Adults behaviour	Name of Person reporting/ referring

Contact details

The contact details of the Social Services Duty Officer or Police Officer to whom the concerns are referred, together with the time and date of the call, and any agreed action to be taken, should be recorded. The WRU Safeguarding Team should be notified of the referral and the above information as soon as possible.

There is a likelihood that this may generate a multi-agency investigation, and the WRU Safeguarding Manager will take the lead for the organisation and may contribute in the following ways:

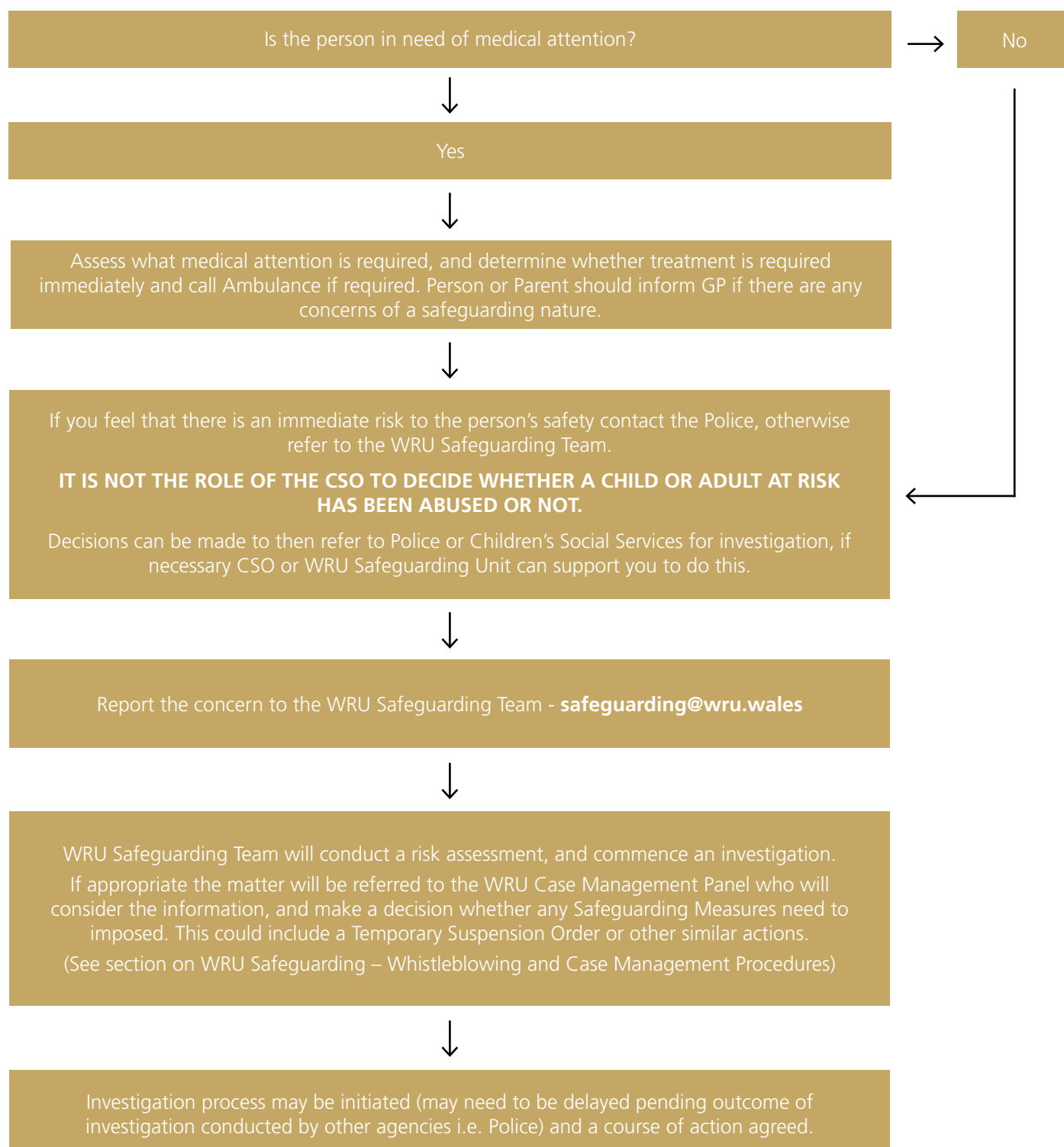
- Attend Strategy Meeting or Telephone Strategy Discussion
- Assist in the Child Protection Section 47 enquiries (multi-agency investigation)

CSOs or other volunteers who may have referred this matter will not be expected to attend the strategy meeting or contribute to these discussions unless it is specifically requested from other professionals.

There are a list of safeguarding contact numbers and email addresses included on page 106.

RESPONDING TO ALLEGATIONS OF ABUSE (within or outside a rugby environment)

Follow the Six R's. Recognise what the issues are and ensure that the Child or Adult at Risk is Reassured. If there is a risk of further immediate abuse, take action and if urgent contact the Police. Record what is said or a summary of this and ensure that you Retain any written records. Do not make promises of confidentiality.



The Role of Statutory Agencies - Child Protection

If there is a concern referred to Social Services, regarding a child protection matter, the information will be reviewed and action considered. Social Services will discuss the case and may have a telephone strategy discussion with Police before making a decision as to how the matter is investigated and conduct an initial assessment.

A strategy discussion should take place as a minimum between appropriate personnel with responsibility for child protection in Police and Social Services and the referring agency. The discussion should include other relevant professionals such as Health, Education and a member of the WRU Safeguarding Team.

The purpose of the strategy discussion is to share and discuss in detail all information gathered to date, as well as the nature of the concern.

The staff involved in the discussion should be sufficiently senior to make decisions on behalf of their agency. The discussion can take place either in person or over the telephone, and may take place at any stage following referral.

The strategy discussion should agree the course of action required and timescales set for those actions to be carried out. It should agree what information about the strategy discussion is shared with the family. Professionals should keep families fully informed unless such information sharing may place the child at risk of significant harm and/or jeopardise Police investigations into any alleged offence(s).

The strategy discussion must consider any wider safeguarding needs.

The strategy discussion may result in the decision to take one or more of the following course(s) of action:

- No further action - if it transpires that the allegation is without substance and there are no other concerns
- Referral to support services if preliminary enquiries have revealed significant unmet needs for support and services but no issues in relation to significant harm
- Child protection enquiries
- Emergency action to safeguard the child if he or she is considered to be at imminent risk of significant harm

The multi-agency investigation will be conducted and when completed there will be an Outcome Professional Strategy Meeting held to decide, whether on the balance of probabilities the concerns are substantiated. If the concerns are not deemed to be substantiated, then the outcome should be recorded as unsubstantiated, unfounded or deliberately invented or malicious.

The following definitions will guide strategy meetings in determining which outcome applies; Allegations will have outcomes within the following four categories:

- **Substantiated** – a substantiated allegation is one which is established by evidence or proof.
- **Unsubstantiated** – an unsubstantiated allegation is not the same as an allegation that is later proved to be false. It simply means that there is insufficient identifiable evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded** – this indicates that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances. For an allegation to be classified as unfounded, it will be necessary to have evidence to disprove the allegation.
- **Deliberately invented or malicious** – this means there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.

The outcomes discussion would normally precede any decision by the employer to invoke disciplinary procedures. Where the concerns are substantiated, employing or volunteer agencies should consult if not already done so with the Disclosure and Barring Service and other relevant professional bodies about the requirement for a referral.

Confidentiality and Information Sharing

Decisions on who needs to be informed should be taken by the WRU after discussion with statutory agencies. Remember that the Data Protection Act is not a barrier to sharing information. If you require advice on this please contact the WRU Safeguarding Team.

Sharing information is a critical element of safeguarding, and consent should normally be sought from the subject(s) of the information in order for it to be shared. However in the interests of child protection, it may be necessary for information to be shared with relevant staff and volunteers within the WRU, Social Services, Police and other sports organisations without consent if there is reason to believe that seeking consent could place a child at risk in a position of significant harm.

The WRU will only share confidential information without consent where there is a reasonable belief that failure to disclose would place the child or adult at risk at increased risk of significant harm and/or would undermine the prevention, detection or prosecution of a serious crime.

Sharing Concerns with Parents

Commitment to working with parents and guardians is important when having concerns about a person's well-being. Therefore, in most situations, it would be important to talk to parents or guardians to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation. He/she may have experienced an upset in the family such as parental separation or divorce or bereavement.

There are circumstances in which a child might be placed at even greater risk if such concerns were shared (e.g. where a parent or guardian may be responsible for the abuse or not able to respond to the situation appropriately). In these situations or where concerns still exist, any suspicion, allegation or incident of abuse must be reported to the CSO as soon as possible and recorded. Parents or Guardians should not be contacted if the concern is about sexual abuse. This will be done by Social Services and/or the Police at the appropriate time.

A background image of a rugby match, showing several players in dark jerseys jumping high to catch a ball. The image is overlaid with a semi-transparent green filter. A large orange rectangle is centered over the image, containing the title text.

SAFEGUARDING ADULTS

SAFEGUARDING ADULTS

Background

The WRU is committed developing best practice in safeguarding and to uphold the rights of all adults to live a life free from harm from abuse, exploitation and neglect. We believe that everyone has the right to do this regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

The WRU is committed to Safeguarding Adults in line with national legislation and relevant national and local guidelines.

We will safeguard adults by ensuring that our activities are delivered in a way which keeps all adults safe.

We are committed to creating a culture of zero-tolerance of harm to adults which necessitates –

- the recognition of adults who may be at risk and the circumstances which may increase risk.
- knowing how adult abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns.

This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person's own home and in any care setting.

We are committed to creating and maintaining a safe and inclusive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

The WRU acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults involved. 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, such as communicating concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

The WRU recognises that there is a legal framework within which sports need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions 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.

Purpose

The purpose of this policy is to demonstrate the commitment of the WRU to safeguarding adults and to ensure that everyone involved is aware of:

- The legislation, policy and procedures for safeguarding adults.
- Their role and responsibility for safeguarding adults.
- What to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult within the organisation.

Scope

This safeguarding adult policy and associated procedures apply to all individuals involved in including Board and Council Members, Staff, Coaches, Team Managers, Medical Staff, Referees, Volunteers, Club Officials and Members, and to all concerns about the safety of adults whilst taking part in our organisation, its activities and in the wider community.

We expect our partner organisations, including for example, our clubs, hubs and regions along with our affiliates to adopt and demonstrate their commitment to the principles and practice as set out in this Safeguarding Adults Policy and associated procedures.

Commitments

In order to implement this policy the WRU will ensure that:

- Everyone involved in Welsh Rugby is aware of the safeguarding adult procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an adult.
- Any concern that an adult is not safe is taken seriously, responded to promptly, and followed up in line with this policy and procedures.
- The well-being of those at risk of harm will be the paramount objective in safeguarding adults
- Adults will be actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to.
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy and Procedures.
- The WRU acts in accordance with best practice advice, for example, from UK Sport, Sport Wales, National Governing Bodies, NSPCC, Ann Craft Trust.
- The WRU will cooperate with the Police and the relevant Local Authorities in taking action to safeguard an adult.
- All Board members, staff, officials and volunteers understand their role and responsibility for safeguarding adults and have completed and are up to date with safeguarding adult training and learning opportunities appropriate for their role.
- The WRU has safe recruitment practices and continually assesses the suitability of volunteers and staff to prevent the employment/deployment of unsuitable individuals in this organisation and within the sporting community.

- The WRU will share information about anyone found to be a risk to adults with the appropriate bodies. For example: Disclosure and Barring Service, Services, Police, Local Authority/Social Services.
- When planning activities and events the WRU will include an assessment of, and risk to, the safety of all adults from abuse and neglect and designates a person who will be responsible as a safeguarding lead for that event (Club Safeguarding Officer or nominated representative)
- This policy, and the Safeguarding Adults Procedures are reviewed no less than on a three year cycle, or whenever there are changes in relevant legislation and/or government guidance as required by the Local Safeguarding Board, UK Sport, Sport Wales or as a result of any other significant change or event.

Implementation

The WRU is committed to developing and maintaining its capability to implement this policy and procedures.

In order to do so the following will be in place:

- A clear line of accountability within the organisation for the safety and welfare of all adults.
- Access to relevant legal and professional advice.
- Regular management reports to the Board detailing how risks to adult safeguarding are being addressed and how any reports have been addressed.
- Safeguarding adult procedures that deal effectively with any concerns of abuse or neglect, including those caused through poor practice.
- Club Safeguarding Officer (see section on Club Safeguarding Officers)
- Delegated Safeguarding Lead for events/trips/camps/ competitions.
- WRU Safeguarding Panel for investigating safeguarding matters and referring cases, with an appointed Chair and clear Terms of Reference (see section on WRU Safeguarding - Whistleblowing and Case Management Procedures – page 85)
- Arrangements to work effectively with other relevant organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Codes of Conduct for Board members, Staff, Coaches, Team Managers, Medical Staff, Referees, Volunteers, Club Officials and Members and other relevant individuals that specify zero tolerance of abuse in any form.
- Risk assessments that specifically include safeguarding of adults.
- Policies and procedures that address how to recognise, respond and report concerns, investigations and the case management process
- There is also a [WRU Safeguarding Kit Bag](#) that provides practical guidance for Club Safeguarding Officers, Coaches, Staff and Volunteers who are coaching in Youth, Mini and Junior, Mixed Ability and Disability Rugby

Key Points

- There is a legal duty on Local Authorities to provide support to 'adults at risk'.
- Adults at risk are defined in legislation and the criteria applied differs between each home nation.
- The safeguarding legislation applies to all forms of abuse that harm a person's well-being.
- The law provides a framework for good practice in safeguarding that makes the overall well-being of the adult a priority of any intervention.
- The law in Wales emphasises the importance of person-centred safeguarding.
- The law provides a framework for making decisions on behalf of adults who can't make decisions for themselves (Mental Capacity).

The law provides a framework for sports organisations to share concerns they have about adults at risk with the local authority.

The law also provides a framework for all organisations to share information and cooperate to protect adults at risk.

Safeguarding Adults Legislation

Safeguarding Adults in all home nations is compliant with United Nations directives on the rights of disabled people and commitments to the rights of older people. It is covered by:

- The Human Rights Act 1998
- The Data Protection Act 2018
- General Data Protection Regulations 2018

The practices and procedures within this policy are based on the relevant legislation and government guidance.

- Wales - Social Services and Well Being Act 2014
- Wales Safeguarding Procedures 2019

Definition of an Adult at Risk (Social Services and Well Being Act 2014)

An adult at risk is 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;

as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The Safeguarding Adults legislation creates specific responsibilities on Local Authorities, Health, and the Police to provide additional protection from abuse and neglect to Adults at Risk.

When a Local Authority has reason to believe there is an adult at risk, they have a responsibility to find out more about the situation and decide what actions need to be taken to support the adult. In Wales, the Local Authority can gain access to an adult to find out if they are at risk of harm for example, if that access is being blocked by another person.

The actions that need to be taken might be by the Local Authority (usually social services) and/or by other agencies, for example the Police and Health. A sporting organisation may need to take action as part of safeguarding an adult, for example, to use the disciplinary procedures in relation to a member of staff or member who has been reported to be harming a participant. The Local Authority role includes having multi-agency procedures which coordinate the actions taken by different organisations.

Safe Recruitment

Legally, anyone undertaking a role that involves contact with, or responsibility for, children or other vulnerable adults should be taken through a safer recruitment process. Some individuals may not be suitable to work with adults at risk due to gaps in their understanding, skills, or knowledge. There may also be some concerns about their previous conduct.

Good Recruitment Practice

If a role is eligible, a DBS check at the appropriate level can be requested. But this is only one part of a safe recruitment process. In all cases regarding the vetting of paid and voluntary staff, best practice dictates thoroughly checking a candidate's training and qualifications.

All of the following should form the basis of safe recruitment and best practice when recruiting individuals to work with adults at risk:

- Detailed application forms.
- Self-disclosure.
- Robust interviews that cover safeguarding, equality, and diversity knowledge and skills.
- Reference checks.
- A thorough induction process.
- Verification of qualifications and experience.
- Risk assessments.

Once the person is in the role, there should be a probationary period and review, as well as regular safeguarding training that includes safeguarding adults at risk.

Disclosure and Barring Service (DBS) and Regulated Activities

A DBS check was formerly known as a CRB check. It is a means of supplying your organisation with the information you need to help you make safer recruitment and placement decisions. This is particularly vital when it comes to positions involving adults at risk.

Full Risk Assessment Process

If there is information contained on the DBS certificate or other relevant information that indicates that the volunteer may pose a risk to adults at risk then the matter will be investigated further, with the volunteer being asked to supply further information regarding the conviction(s).

The volunteer is required to provide a letter of explanation regarding the convictions that indicate that a risk may be presented. The volunteer will also be required to provide two

independent references. This will be done confidentially between the WRU Safeguarding Team, the individual, and the CSO.

It is vitally important that the volunteer provides accurate, detailed and reliable information regarding their convictions, so that the appropriate risk assessment can be conducted. If there is any suggestion that all of the relevant information has not been disclosed, this will be considered in any decisions taken regarding their suitability to work with adults at risk, and would be considered a breach of the Safeguarding Policy.

Once the information has been gathered, if it is necessary and proportionate to do so, further enquiries will be made with statutory agencies such as the Police so that all the relevant information can be assessed.

The matter will then be considered by the WRU Safeguarding Panel who will decide upon the suitability of the volunteer. If it is believed that temporary safeguarding measures need to be in place to mitigate the risk while the investigation is progressing, then a temporary suspension can be imposed by the panel.

There are two potential outcomes to this process in relation to the decision of the WRU Safeguarding Panel:

- The suitability risk assessment will be completed and the disclosure cleared through the safe recruitment process, to enable the volunteer or member of staff to volunteer or work in regulated activity OR
- The panel consider that the individual does pose a risk and would therefore be excluded from working or volunteering with children

Abuse and Neglect

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place.

Safeguarding legislation in each home nation lists categories of abuse differently. In Wales, these are the defined types of abuse:

- Physical
- Sexual
- Psychological
- Neglect
- Financial

Abuse can take place in any relationship and there are many contexts in which abuse might take place; e.g. Institutional abuse, Domestic Abuse, Forced Marriage, Human Trafficking, Modern Slavery, Sexual Exploitation, County Lines, Radicalisation, Hate Crime, Mate Crime,

Cyber bullying, Scams. Some of these are named specifically within home nation legislations.

Abuse can take place within a sporting context and the person causing harm might be any other person. For example: a member of staff, a coach, a volunteer, a participant or a fan.

Some examples of abuse within sport include:

- Harassment of a participant because of their (perceived) disability or other protected characteristics.
- Not meeting the needs of the participant e.g. training without a necessary break.
- A coach intentionally striking an athlete
- One elite participant controlling another athlete with threats of withdrawal from their partnership
- An official who sends unwanted sexually explicit text messages to a participant with learning disabilities.
- A participant threatens another participant with physical harm and persistently blames them for poor performance.

Abuse or neglect outside sport could be carried out by:

- A spouse, partner or family member
- Neighbours or residents
- Friends, acquaintances or strangers
- People who deliberately exploit adults they perceive as vulnerable
- Paid staff, professionals or volunteers providing care and support

Often the perpetrator is known to the adult and may be in a position of trust and/or power.

Signs and Indicators of Abuse and Neglect

An adult may confide to a member of staff, coach, volunteer or another participant that they are experiencing abuse inside or outside of the organisation's setting. Similarly, others may suspect that this is the case.

There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to -

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions. You may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Someone losing or gaining weight / an unkempt appearance. This could be a player whose appearance becomes unkempt, does not wear suitable sports kit and there is a deterioration in hygiene.

- A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions in contrast to their personal assistant whom they greet with a smile.
- Self-harm.
- A fear of a particular group of people or individual.
- A parent/carer always speaks for the person and doesn't allow them to make their own choices
- They may tell you / another person they are being abused – i.e. a disclosure

Wellbeing Principle

The success of sport, in terms of helping people achieve their potential, making the most of existing talent, and attracting new people to sport relies on putting people – their safety, wellbeing and welfare – at the centre of what sport does.

Duty of care in sport independent report. Report by Baroness Tanni Grey-Thompson DBE, DL.

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.

Being able to live free from abuse and neglect is a key element of well-being.

The legislation recognises that statutory agencies have sometimes acted disproportionately in the past. For example, removing an adult at risk from their own home when there were other ways of preventing harm. In the words of Justice Mumby *'What good is it making someone safe when we merely make them miserable?'* *What Price Dignity?* (2010)

For that reason any actions taken to safeguard an adult must take their whole well-being into account and be proportionate to the risk of harm.

Person Centred Safeguarding/ Making Safeguarding Personal

The legislation also recognises that adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from friends and family to take a better job. Similarly, adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety we need to understand 'What matters' to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.

The concept of 'Person Centred Safeguarding'/'Making Safeguarding Personal' means engaging the person 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.

Organisations work to support adults to achieve the outcomes they want for themselves. The adult's views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find 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 someone has difficulty making their views and wishes known, then 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).

The Principles of Adult Safeguarding (Social Services and Wellbeing Act 2014)

The Act's principles are:

- Responsibility - Safeguarding is everyone's responsibility.
- Well-being - Any actions taken must safeguard the person's well-being.
- Person-centred approach - Understand what outcomes the adult wishes to achieve and what matters to them.
- Voice and control - Expect people to know what is best for them and support them to be involved in decision making about their lives.
- Language - Make an active offer of use of the Welsh language and use professional interpreters where other languages are needed.
- Prevention - It is better to take action before harm occurs.

Mental Capacity and Decision Making

We make many decisions every day, often without realising. UK Law assumes that all people over the age of 16 have the ability to make their own decisions, unless it has been proved that they can't. It also gives us the right to make any decision that we need to make and gives us the right to make our own decisions even if others consider them to be unwise.

We make so many decisions that it is easy to take this ability for granted. The Law says that to make a decision we need to:

- Understand information.
- Remember it for long enough.
- Think about the information.
- Communicate our decision.

A person's ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.

Most adults have the ability to make their own decisions given the right support however, some adults with care and support needs have the experience of other people making decisions about them and for them.

Some people can only make simple decisions like which colour T-shirt to wear or can only make decisions if a lot of time is spent supporting them to understand the options. If someone has a disability that means they need support to understand or make a decision this must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called “lacking mental capacity”.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person’s mental capacity can change. If it is safe/possible to wait until they are able to be involved in decision making or to make the decision themselves.

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

Mental Capacity is important for safeguarding for several reasons.

Not being allowed to make decisions one is capable of making is abuse. For example, a disabled adult may want to take part in an activity but their parent who is their carer won’t allow them to and will not provide the support they would need. Conversely the adult may not seem to be benefiting from an activity other people are insisting they do.

Another situation is where an adult is being abused and they are scared of the consequences of going against the views of the person abusing them. It is recognised in the law as coercion and a person can be seen not to have mental capacity because they cannot make ‘free and informed decisions’.

Mental Capacity must also be considered when we believe abuse or neglect might be taking place. 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 you their views.

There is legislation that describes when and how we can make decisions for people who are unable to make decisions for themselves. The principles are -

- We can only make decisions for other people if they cannot do that for themselves at the time the decision is needed.
- If the decision can wait, wait – e.g. to get help to help the person make their decision or until they can make it themselves.
- If we have to make a decision for someone else then we must make the decision in their best interests (for their benefit) and take into account what we know about their preferences and wishes.
- If the action we are taking to keep people safe will restrict them then we must think of the way to do that which restricts to their freedom and rights as little as possible.

Many potential difficulties with making decisions can be overcome with preparation. A person needing support to help them make decisions whilst taking part in a sports organisation will ordinarily be accompanied by someone e.g. a family member or formal carer whose role includes supporting them to make decisions.

It is good practice to get as much information about the person as possible. Some people with care and support needs will have a 'One page profile' or a 'This is me' document that describes important things about them. Some of those things will be about how to support the person, their routines, food and drink choices etc. but will also include things they like and don't like doing. It's also important to have an agreement with the person who has enrolled the adult in the sports activity about how different types of decisions will be made on a day to day basis.

If a person who has a lot of difficulty making their own decisions is thought to be being abused or neglected you 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.

There may be times when the WRU needs to make decisions on behalf of an individual in an emergency. Decisions taken in order to safeguard an adult who cannot make the decision for themselves could include:

- Sharing information about safeguarding concerns with people that can help protect them.
- Stopping them being in contact with the person causing harm.

Recording and Information Sharing

All sports organisation must comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).

Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.

Sharing information, with the right people, is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a 'need to know'.

This does NOT automatically include the person's spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation.
- Case management meetings can take place to agree to co-ordinate actions by the organisation.

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

The circumstances when we need to share information without the adult's consent include those where:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- you believe they or someone else is at risk, including children.
- you believe the adult 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 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 this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

If you are in doubt as to whether to share information seek advice e.g. seek legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

Multi-Agency Working

Safeguarding adults' legislation gives the lead role for adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations.

The WRU may need to co-operate with the Local Authority and the Police including to:

- Provide more information about the concern you have raised.
- Provide a safe venue for the adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Provide a safe environment for the adult to continue their sporting activity/ their role in the organisation.

Reporting and Responding – Safeguarding Adults

The WRU is committed to providing a safe environment for everyone to participate in our organisation and its activities. The WRU will ensure that any safeguarding investigations involving adults are managed with the interests of the person at the centre of it. The WRU will strive to ensure that they promote individual well-being, and that people have a voice, with their views, wishes, feelings and beliefs taken into account when decisions are made.

These procedures must be followed in any circumstances where an adult is at risk of harm. This procedure details the steps to be taken in responding to any concern that an adult involved in Welsh Rugby, or its activities, is at risk of or is experiencing harm.

The procedures have two main sections

- Reporting concerns- For everyone
- What happens next – For Safeguarding Lead and organisational response

Reporting Concerns – For Everyone

If you are in immediate danger or need immediate medical assistance contact the emergency services 999.

Please contact the WRU Safeguarding Team. If you would prefer, please contact another member of staff who will help you raise the issue to the Safeguarding Lead.

If the WRU Safeguarding Manager is implicated or you think has a conflict of interest, then report to the WRU Head of Policy and Integrity, and if that person is implicated then report to the WRU Community Director.

You can also contact the Police, Social Services, your Doctor or other organisations that can

The WRU Safeguarding Team will follow the procedures in this document. If you do not think your concerns are being addressed in the way that they should be please contact the WRU Head of Policy and Integrity.

At all stages you are welcome to have someone who you trust, support you and help you to explain what happened and what you want to happen.

It is of upmost importance to the WRU that you can take part in our activities safely and we will take every step to support you to do that.

Responding to a disclosure from an Adult

Note that poor practice concerns need to be recorded as well as instances of more serious abuse. This is because, if you don't address them, frequent poor practice incidents can escalate into more serious situations.

Communication is essential. The way that you document and keep records can make all the difference. Whether through individual log books or shift reports, sharing information can build a picture that could help identify poor practice or abuse. A good care plan means that staff can understand the needs of each person being supported by the service.

It is also important that you record the right kind of information. A person's demeanour, what they are wearing, or what they have eaten that day can all be tell-tale signs of abuse. Patterns of behaviour are also a good way to check wellbeing. For example, an individual may behave different whenever a certain member of staff is present. Could this mean they're being bullied?

Recording should be impartial. So write down what you see and not what you feel.

Whenever a concern is raised, consider the available evidence, and whether you need to gather any additional evidence. You should retain any physical evidence to keep it safe from tampering. This is yet another process you could outline in your policy. Also keep records of relevant evidence that you may need at a later date.

- If an Adult discloses that they are being abused, the safety of the individual is the paramount consideration.
- Identify if someone is injured or, and if so take immediate action by seeking help i.e. contacting the Police or Ambulance
- Stay calm and ensure that the person feels safe, particularly if there is an immediate risk presented
- Show the person that you have heard what they are saying, and that you take their allegations seriously
- Seek consent from the person concerned, only if you feel that they do not have the capacity to consent, you can then act without consent, but you must record your decision in writing.
- Tell the person involved what you are going to do about the concern and note any views that they may have regarding how they wish the matter to be dealt with
- Active Listening is key. Don't make them repeat their account of what happened, unless you need to clarify something

What are the Next Steps?

Many local authorities have developed protocols establishing arrangements for conducting initial assessments by local services and defining the circumstances and thresholds under which an adult should be referred to social services.

Referrals should be made to Social Services as soon as a problem, suspicion or concern about an adult at risk becomes apparent, and certainly within 24 hours.

Outside office hours, referrals should be made to the Social Services emergency duty team or the Police. Social Services and the Police must ensure that an appropriate level and deployment of trained staff are available to undertake the necessary enquiries.

Completing the Report

The report can be made via e-mail to the WRU Policy and Integrity Team via the Integrity Mailbox integrity@wru.wales and should be marked as confidential. The referral should contain personal information and an incident report including the following information

Personal Information – Victim

Name of the Club	Ethnicity
Time and Date of Incident	Any additional needs of the person
Name of the Adult	Name and contact details of the Next of Kin or Carer
Date of birth or age of the person	
Address and Contact details	

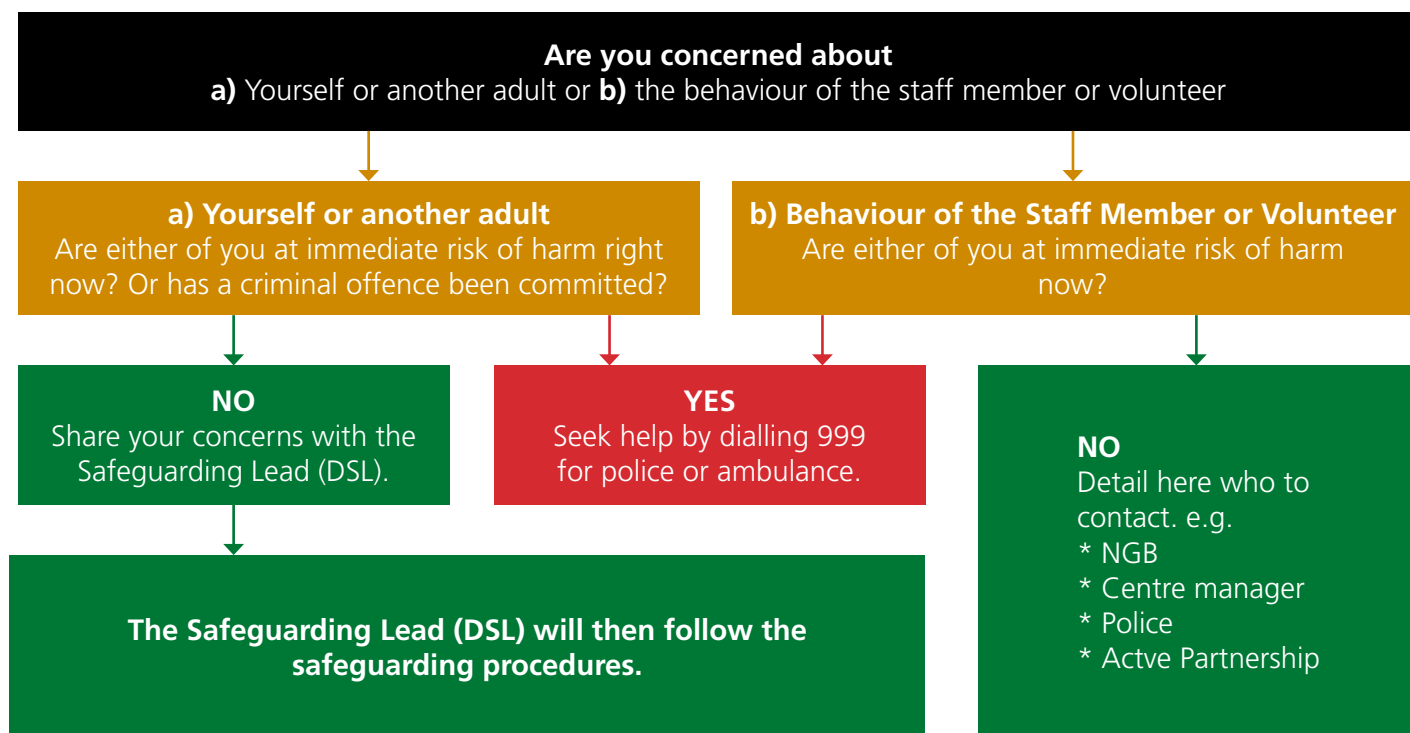
Person Subject of Concern (PSC)

Name of the Person	Ethnicity
Address and Contact details	Role
Date of birth or age of the person	

Incident Report

- Brief details of what occurred/ allegation made and any background knowledge
- Description of any visible injuries
- Any observed changes in the person's behaviour
- Any background knowledge that you may have regarding the adult at risk (additional needs etc.)
- Actions taken to date
- Any external agencies informed?
- Name of Person reporting/ referring and Contact details

Raising and Managing a Concern



WRU SAFEGUARDING - WHISTLEBLOWING AND CASE MANAGEMENT PROCEDURES

WHISTLEBLOWING

Safeguarding children, young people and adults requires everyone to be committed to the highest possible standards of openness, integrity and accountability.

The WRU have a dedicated Integrity Hotline and e-mail address for members of the public or staff to report any integrity concerns that they have, and this includes safeguarding, anti-doping and other integrity related matters. (See contact details on page 106)

'Whistle-blower' is a term commonly used to describe a person who alerts an authority to acts of wrongdoing, usually by someone within the authority's jurisdiction. Whistle-blowers are witnesses to malpractice and must not be penalised for any disclosure of information, in fact certain categories of whistle-blowers are protected by the law.

The WRU supports an environment where staff and volunteers, members and their parents, carers, guardians and the public are encouraged to raise safeguarding and child and adult protection concerns. Anyone who reports a legitimate concern to the organisation will be supported and all concerns will be taken seriously.

The WRU are committed to encouraging a culture of openness, as it is important to uphold the reputation of the organisation, maintain the confidence of participants and volunteers within the sport, and also ensure that the public have confidence in the organisation.

It is acknowledged that individuals are often very reluctant to report concerns through fear of negative reprisal. The WRU will take action against anyone who has harassed or victimised a whistle blower. The identity of individuals who wish to remain anonymous will not be disclosed without first taking time to explain the circumstances in which disclosure may be desirable.

In some instances, particularly those involving child and adult protection concerns, it may be necessary to refer the matter to other agencies i.e. the Police or Social Services. Any person who reports a genuine concern will not be disadvantaged or discriminated against in any way because of the disclosure. However, the WRU will take a serious view and act accordingly, including taking disciplinary action against appropriate parties, should it be found that the allegations are untrue or have been raised maliciously.

Individuals are encouraged not to report matters anonymously, and although allegations that are made anonymously may be investigated depending on the seriousness of the issues raised, the credibility of the concern, and it can be difficult to corroborate the allegation.

In the first instance, poor practice concerns that relate to a club should be referred to the Club Safeguarding Officer or a member of the Senior Management Committee except where:

- The whistle blower believes there would be a risk of victimisation, either to the whistle blower or child/children, or adult at risk, if the matter was raised internally within the club
- The whistle blower has already raised the matter internally and the matter was covered up or no action was taken and the situation remains unchanged

Allegations of Non Recent Abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who claims to have been abused as a child by a member of staff who is still currently working with children).

Where such an allegation is made, the WRU will follow the procedures as detailed above and report the matter immediately to the Police and Social Services. This information may indicate a risk to other children or adults, either within or outside sport, so consideration may also need to be given to applying safeguarding measures such as an interim suspension.

However, statutory agencies will have primacy in conducting this type of investigation and these measures should be discussed as part of the strategy meeting or discussion, so that the investigation is not compromised.

If the WRU are aware of information through previous involvement with rugby, and new concerns come to light, the WRU can consider all of the information available in order to make an informed safeguarding decision.

All staff, members and volunteers are expected to ensure that information relating to a child or adult protection concern is reported to the WRU Safeguarding Team or CSO to enable appropriate action to be taken. It is essential that only those who need to know are informed.

The decision to share will be taken by the WRU Safeguarding Team, in consultation with statutory agencies and the WRU Safeguarding Panel, providing that this will not delay the referral. Confidential information will only be passed to agencies that require access for safeguarding purposes on a 'need to know' basis. A record will be maintained in the Case Management Safeguarding Log or other source outlining the reason for the disclosure, to whom it was shared and the details that were provided.

Decisions on who needs to be informed should be taken by the WRU after discussion with statutory agencies. The Data Protection Act is not a barrier to sharing information. If you require advice on this please contact the WRU Safeguarding Team.

Investigations

The WRU support clubs, hubs and regions in providing safe environments, but when conduct falls below the expected standards, we also have a responsibility to ensure these issues are appropriately addressed. There are a number of different policies, rules and regulations to ensure that there is accountability in these circumstances.

It is essential that the WRU has transparent, objective and formal safeguarding and disciplinary procedures which enable decisions to be made fairly and justifiably in order to protect children and adults.

Where disciplinary action is deemed appropriate, the civil standard of proof of the 'balance of probability' will be applied. Thus, the decision will rest on whether it is more likely than not that the allegation is true.

There are many different types of incidents or complaints that are reported to the WRU. The incidents or complaints can include matters of poor practice, on field discipline, Code of Conduct complaints or serious child or adult protection issues. The WRU work in partnership

with others in responding to these complaints, and these may be involved in the discussions as part of the initial assessment process.

The WRU Safeguarding Team will investigate these matters, and will conduct an initial safeguarding assessment. The concern will be referred to the WRU Safeguarding Panel, who will appoint an Independent Chair. The Panel will assess any safeguarding risks that are presented, and issue appropriate safeguarding measures.

The decisions made in any assessment will have the welfare of the child or the adult at the centre of any decision making.

Any safeguarding actions or measures will be proportionate to the risk presented. Information will only be shared on a legal basis and for a safeguarding purpose.

If there are any concerns that relate to WRU staff, members or volunteers, these will be taken very seriously. Where there is a suspicion that a child or adult has been abused by a WRU volunteer or employee, this will be reported through the appropriate process and an investigation conducted.

In the case of Misconduct matters, such as allegations of unacceptable touchline behaviour or allegations of racist, sexist or homophobic behaviour these will be dealt with through the WRU Discipline Regulations. However if there is a safeguarding element to these investigations then the WRU Safeguarding Manager and WRU Discipline Manager will discuss, assess and determine what procedures apply.

Codes of Conduct

The WRU are committed to supporting clubs, hubs and regions, and our mission is to ensure that we develop safe environments in our game. The WRU Code of Conduct sets out the standards that are expected, to ensure that we protect our players, officials, volunteers, referees and also the reputation and values of our Game.

There are separate Codes of Conduct relating to:

Players; Coaches; Team Managers and Club officials; Match Officials; Referee Advisors; Spectators; and Social media and Communications each of which shall be applied accordingly.

For breaches of the Codes of Conduct, the WRU Safeguarding or Disciplinary Panel may impose such sanctions and penalties as it deems appropriate.

There are five different types of investigation that are conducted:

Category	Type of Investigation	Type of Concern	Lead Agency/ Process
1	Statutory Agency Investigation	Serious criminal offences (i.e. allegations of abuse)	Police/ Social Services (monitored by WRU)
2	WRU Safeguarding Investigation	Criminal offences that have not proceeded through the criminal justice process	WRU Safeguarding Panel (Independent Panel)
3	WRU Safeguarding Investigation or Club Investigation	Lower-level safeguarding, misconduct or poor practice	WRU Safeguarding Panel, Discipline Panel or Club Matter Gatekeeper will assess risk and refer accordingly
4	WRU Safeguarding Investigation	Safe Recruitment Concerns	WRU Safeguarding Manager (Gatekeeper) will refer to WRU Safeguarding Panel (Safeguarding Referral Group – Independent)
5	WRU Safeguarding Appeal	Appeal against Safeguarding or Discipline Decision	Independent Safeguarding or Discipline Appeal Panel

Poor Practice (Lower-Level Concerns)

Poor practice is when the behaviour of an individual in a position of responsibility falls below the expected standards, as described in the WRU Coaches Code of Practice and the WRU Codes of Conduct.

The behaviour may not be immediately dangerous or intentionally harmful to a child, but it is likely to set a poor example. Often a poor practice issue is seen as a lower-level concern but it still needs an appropriate response.

Lower-level concerns may include:

- inadvertent or thoughtless behaviour that can raise doubts about the person's motivation or skill to work with young people.
- behaviour that might be considered inappropriate depending on the circumstances.
- behaviour that does not meet the threshold for statutory investigation.

These issues should be reported to the WRU, but in many instances the matter will be referred back to the club to be addressed through the club discipline process or through other intervention such as training and education.

Clubs should aspire to create a safeguarding culture, so that staff and volunteers feel comfortable in reporting poor practice and more serious concerns.

Wales Safeguarding Procedures

The Wales Safeguarding Procedures set out arrangements for responding to safeguarding concerns about those who work, either in a paid or voluntary capacity, which brings them into contact with children or adults at risk. It also includes individuals who have caring responsibilities for children or adults in need of care and support and their employment or voluntary work brings them into contact with children or adults at risk

It is intended that these procedures support internal disciplinary procedures and provides guidance to deal appropriately with any concerns or allegations of professional abuse, neglect or harm, and to ensure that all allegations of abuse made against staff or volunteers working with children, young people and adults are dealt with in a fair, consistent and timely manner.

The main factor to consider when applying these procedures is whether the individual subject to the allegation or concern, occupies a position of trust; this is where a member of staff / volunteer is in a position of power or influence over a child or adult, by virtue of the work or nature of activity being undertaken.

Every Council has a duty to manage allegations and concerns about any person who works with children and young people and adults in their area. They should all have an identified senior manager responsible for safeguarding who is accountable and responsible for allegations against professionals and those in positions of trust.

Local Authority Designated Officer

Local Authority Designated Officer (LADO) has been an identified title associated with these responsibilities, however, this may be delegated to Officers within the local authority and known as Designated Officer for Safeguarding (DOS). The Designated Officer for Safeguarding is responsible for managing all allegations made against staff and volunteers who work with children and adults at risk within their area.

When considering the application of these procedures a number of factors should be considered. Some concerns could be considered as poor professional practice and may be more appropriate to be dealt with via agencies' own internal processes or through providing appropriate advice, guidance or training.

If agencies decide not to take any further action they must record their rationale for this decision via their internal recording mechanisms. It is critical that these records are retained in case there is further or repeated concern. If agencies are unclear about what action to take, they must seek appropriate advice from the Designated Officer for Safeguarding.

Managing cases under these procedures applies to a wider range of allegations than those in which there is reasonable cause to believe a child or adult at risk is suffering, or is likely to suffer harm. It also applies to concerns that might indicate that a person is unsuitable to continue to work with children or adults at risk in their present position or in any capacity. It

should be used in all cases in which it is alleged that a person who works with children or adults has:

- Behaved in a way that has harmed or may have harmed a child or adult.
- May have committed a criminal offence against a child or adult at risk or that has a direct impact on the child or adult.
- Behaved towards a child, children or adult in a way that indicates they are unsuitable to work with both children and adults.

It can be difficult to determine what may fall into the category of "unsuitable to work with children or adults at risk". The employer should consider whether the subject of the allegation or concern has:

- Been the subject of criminal procedures that indicate a risk of harm to a child or adult.
- Caused harm or possible harm to a child or adult and there is a risk in the working, volunteering, or caring environment.
- Contravened or continued to contravene their agency's Safeguarding Policy and Procedures.
- Failed to understand or comply with the need for clear personal and professional boundaries in the work place.
- Behaved in a way in their personal life which could put children and adults at risk of harm.
- Behaved in a way that undermined the trust placed in them by virtue of their position.
- Children who are subject to Child Protection Procedures.
- Has caring responsibilities for an adult who is subject to Adult Protection Procedures.

Professional Strategy Meeting

The professional strategy meeting will be convened by the Designated Officer for Safeguarding when safeguarding allegations/concerns have been raised about a practitioner/person in positions of trust. This can either be in a personal or professional capacity, where the individual has wider contact with children or with adults.

The main functions of the strategy meeting are to:

- Ensure the proper co-ordination of child, adult protection, criminal and employment procedures.
- Share all relevant information about the allegation/concern in question.
- Consider what action may be required to protect the child or adult in question.
- Consider the likelihood of harm to other children or adults with whom the person has contact at work or other activities, and agree any actions that are required.
- Consider and evaluate the risk of harm to the subject's own children, and agree any actions that are required.
- Discuss any previous allegations or other concerns.
- Plan any enquiries needed and allocate tasks and set timescales.
- Decide who is to be interviewed and lead agency.
- Identify a lead contact manager within each agency.
- Decide what information can be shared with whom, when and who will do this.

- Agree timescales for actions and/or dates for further meetings.
- Consider whether the adult's suitability to continue working with children or adults in his or her current position has been called into question.
- Consider whether there are disciplinary issues to be followed up.
- Agree at what stage in the process the disciplinary issues should be followed up.
- Consider any other factors that may affect the management of the case e.g. consideration of the need for a media strategy where there is likely to be press interest.
- Confirm arrangements regarding who will communicate with the person about whom there are concerns and ensure appropriate support is provided.
- Ensure that the appropriate referrals are made to the Disclosure and Barring Service and registering bodies of the professional involved (this can be completed at any point throughout the process).
- More than one professional strategy meeting is likely to be required to coordinate, monitor and review the process.

Reporting and Evidence Gathering

The WRU recommend that if a safeguarding referral is made that the relevant information is supplied. This can be done via email or other methods to the WRU Integrity Mailbox. This should be reported to the WRU Safeguarding Team at the earliest opportunity. (Integrity Line and Mailbox) for the type of information required.

However, the WRU recognise that issues may be identified through other forms of reporting such as Discipline, Referees, Codes of Conduct, General Complaints or via e-mail.

We all have a responsibility, both on and off the field, to promote high standards of behaviour and uphold the values of the Game. Our strategic vision is to encourage everyone involved in Welsh Rugby to provide role model leadership.

Aide Memoir to Complete Witness Accounts

When completing an account of an incident that you have witnessed please set the scene and consider including the following information.

This aide memoir relates to incidents that may have occurred on the field of play, but also may apply to any other scenarios or circumstances. However irrespective of where this has taken place the same principles apply when writing your statement. If you have made notes regarding an incident retain them and use them to assist in compiling any written accounts that you provide. It is important to provide as much detail, as possible and following the 5WH principles when completing any written account or report.

5WH focuses upon open questions to gather the maximum amount of information:

WHO, WHAT, WHEN, WHERE, WHY AND HOW?

- Brief introduction about yourself
- Why were you present, in what capacity?
- When and where did this occur?
- Who was present?
- What did you see?
- Are there any specific incidents that you feel were relevant and describe them in as much detail as possible?
- How did you feel about what you witnessed?
- If you witness a specific incident please consider the following using the 5WH principles:
 - Amount of time did you have the incident under observation?
 - Distance - How far away were you?
 - What was the visibility like, were there any obstructions?
 - Do you know the people involved and in what capacity?
 - If you do not know the people involved can you describe them or provide any identifying features?
 - Did you make any notes and what was the time lapse between the incident and making those notes?
- Is there any special reason to remember a particular person

Initial Assessment and Actions

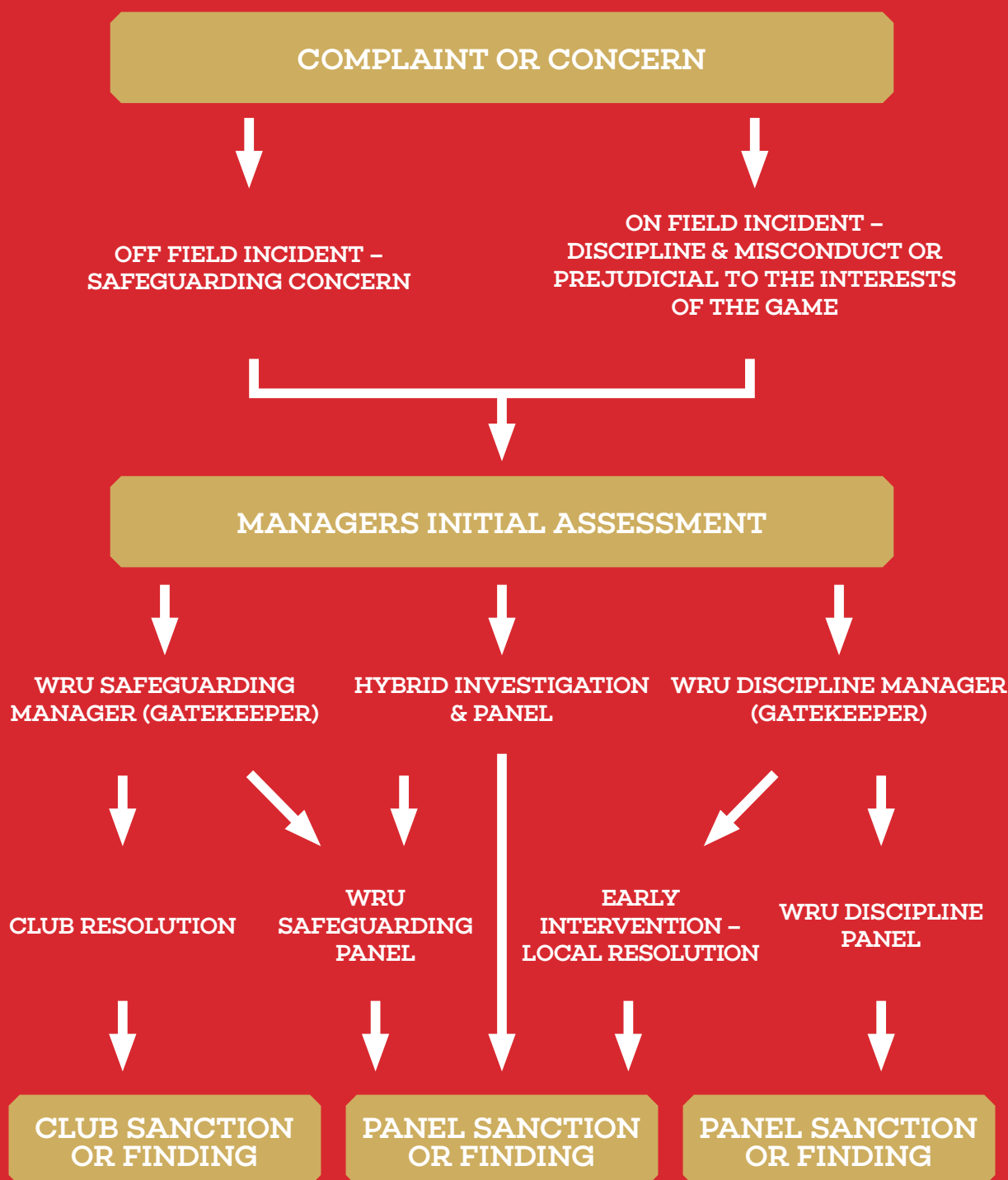
When an incident has been reported, dependent upon the severity and type of allegation, it could proceed in different ways

It may be referred to statutory agencies, and a core assessment will be conducted. The incident or allegation may be the subject of a child or adult protection enquiry and a strategy meeting may be convened as part of that process. This will be attended by a number of different agencies, and if the incident occurred in a rugby environment or there is a potential risk in a rugby environment, a member of the WRU Safeguarding Team will attend or contribute to this meeting.

Decisions will be made in relation to who has primacy to lead the investigation i.e. statutory agencies such as the Police or Social Services, or non-statutory agencies such as the WRU. If the matter is investigated by statutory agencies, the WRU Safeguarding Team will monitor the investigation and liaise with the agency to check on progress and timescales.

If the matter is referred as a Code of Conduct or Safeguarding Discipline issue the initial assessment will be conducted and a decision made as to how this matter should be investigated. It may be referred back to the club for internal disciplinary proceedings, or the WRU may investigate the matter as a safeguarding or discipline matter.

WRU INTEGRITY DECISION MAKING TREE



Information will continue to be gathered as part of the investigative process, and club members or other witnesses may be required to provide written accounts of what they saw.

The WRU Safeguarding Manager will consider any safeguarding issues as part of the initial assessment and screening process, and the initial actions that may be taken are :

- Assessment of whether the Person Subject of Concern (PSC) has access to children or adults at risk elsewhere and if so who needs to be informed.
- Assess the level of severity, grade it accordingly and refer to the appropriate Safeguarding Panel.
- Work closely with Social Services, Police and other agencies and attend strategy meetings as required.
- Provide appropriate support to children, parents, and members including, the complainant, and where appropriate, the PSC.

The WRU Safeguarding Team operate a clear referral process, and where there is a serious and immediate safeguarding risk presented, the matter will be referred to the WRU Safeguarding Panel for their consideration in applying safeguarding measures or other appropriate actions within the sport.

The WRU Safeguarding Panel will be fully briefed by a member of the WRU Safeguarding Team and required to decide on what safeguarding measures need to be issued to mitigate any risk that is presented. These can include temporary measures that can be issued to the person who is subject of concern (PSC), whilst the investigation is being conducted. There is a need to ensure that any measures are justified and proportionate to the risk that is presented.

In determining any measures the Panel will consider the following questions and factors –

- Is there a breach of the WRU Safeguarding Policy?
- Is there a breach of the WRU Codes of Conduct?
- Do the allegations indicate that the PSC poses a safeguarding risk to children and/ or adults at risk?
- Is the risk able to be mitigated and managed within the game?
- Does the PSC need to be protected and removed from the environment as a welfare concern?
- Is there a reputational risk for the WRU?
- Would the continued presence of the PSC impede any enquiries/investigation?

The factors listed above will be taken into consideration alongside the seriousness of the offence or allegation. Suspensions may also be necessary where a member is being investigated for other serious crimes or a breach of Codes of Conduct.

If it does not compromise the safety of the child or integrity of any investigation, the PSC will be notified at the earliest opportunity that they are subject to a safeguarding investigation.

The PSC will be provided with the opportunity to submit a written account/ statement of the incident or the opportunity to be interviewed by a member of the WRU Safeguarding Team. This would be conducted at the conclusion of any statutory agency investigation.

If the PSC is interviewed, they will have the opportunity to have a representative present, if they so wish, but they should notify the WRU in advance of this. The interview can be conducted either in person or online.

The PSC will also have the opportunity to provide references, that should be presented to the WRU Safeguarding Panel, along with other relevant information.

The WRU will liaise with the CSO when dealing with such cases, but will only share information when there is a safeguarding need.

The welfare of the child or adult at risk will always be the paramount consideration, and the WRU will assess the element of risk and base decisions on the balance of probability.

Temporary Safeguarding Measures

The WRU Case Management Panel may decide to issue temporary safeguarding measures whilst the external or internal investigation is being conducted.

If a decision is made to temporarily exclude or suspend a person from rugby regulated activity, any action taken pending the outcome of any investigation and disciplinary process, should not be publicly disclosed and any disclosure should only be made in accordance with WRU Policy and Procedures.

In relation to sharing information such as this, a decision will be made by the WRU Safeguarding Manager on who needs to be informed to ensure that appropriate safeguards are applied and monitored.

Several factors are considered when determining whether a temporary safeguarding measure is necessary and proportionate to the risk. However it must be stressed that this is a neutral act, and not an indication of guilt.

The WRU will specify if the TSO is from all rugby related activity, or only from specific groups i.e. Children (under 18 rugby), Women and Girls rugby, Adults at Risk, or Mixed Ability rugby.

The following are examples of temporary safeguarding measures that can be issued -

Temporary Suspension Order (TSO)

If the WRU Safeguarding Panel decide that safeguarding measures should be imposed, and there is justification they can issue a TSO to a volunteer or staff member within the sport. The Panel must be satisfied that the person presents a risk that cannot be managed without a TSO being issued, and that this is a proportionate response.

If a TSO is issued this will either be reviewed periodically or if the WRU are notified that there are a change in circumstances. If a PSC wishes to appeal a decision to issue a TSO, there must be justification to do so, and the matter will be referred to an independent WRU Safeguarding Review Panel.

Temporary Conditional Suspension Order (TCSO)

If the WRU Safeguarding Panel decide that safeguarding measures should be imposed, and there is no justification to issue a TSO, then they can consider issuing a TCSO to a volunteer or staff member within the sport. The Panel must be satisfied that the person presents a risk that can be managed by the WRU and or the club. The TCSO is issued and the conditions have to be complied with.

There may be conditions that are imposed for action to be taken within a particular timescale i.e. a coach may be issued with a TCSO with the condition that a DBS check or coaching qualification is completed within a specified timescale.

Temporary Exclusion Order (TEO)

If the WRU decide that safeguarding measures should be imposed, and there is justification they can issue a TEO to a volunteer or staff member who is due to take up a role within the sport.

An example of this is where a person expresses an interest in coaching children or adults at risk, but refuses to complete a DBS check, or there is information to question his/ her suitability for the role, based on a safeguarding concern.

The prospective coach is not in post so cannot be suspended, but could be excluded if the WRU decide that there is a current safeguarding risk presented.

The Panel must be satisfied that the person presents a risk that cannot be managed without a TEO being issued, and that this is a proportionate response to the risk.

If a TEO is issued this will either be reviewed periodically or if the WRU are notified that there are a change in circumstances. If a PSC wishes to appeal a decision to issue a TEO, there must be justification to do so, and the matter will be referred to an independent WRU Safeguarding Review Panel.

WRU Safeguarding Panels

The WRU Safeguarding Team manage the reporting and investigation process, and assess each case on the basis of risk. The welfare of the child or adult will always be the paramount consideration. The matter may have been fully investigated by statutory agencies, and their views will be taken into consideration. However irrespective of the findings of any external investigations, the WRU will assess all individual cases to decide whether action should be taken internally by the WRU as a safeguarding concern.

The WRU Safeguarding Panel are appointed and convened by the WRU Safeguarding Manager to consider such matters. All panel members receive training and have the relevant skills and safeguarding experience to deal with such matters.

The purpose of the WRU Safeguarding Panel is to ensure that all safeguarding concerns referred are dealt with in a fair, consistent, efficient, and effective manner and with a victim centred approach, to ensure that any risks presented are appropriately managed.

The WRU Safeguarding Panel have an appointed Independent Chair, and all decisions are made by the independent three person panel as a collective. If there is not a unanimous decision then the majority decision will be accepted.

This provides an element of independency from the investigation either conducted by statutory agencies and/ or the WRU Safeguarding Team.

The WRU Safeguarding Panel have responsibility to undertake an effective review and analysis of all relevant information and evidence that has been gathered as part of the safeguarding investigation process, and decide if any safeguarding measures need to be implemented. There are a range of actions that are outlined later in this section, that can be taken.

The PSC will be notified by e-mail that the matter will be referred to the WRU Safeguarding Panel, and offered the opportunity to submit written representations to the panel. The PSC will be entitled to bring a representative to the hearing with them if they require support or guidance, and or any witnesses to support their case.

The role of the WRU Safeguarding Manager is to assist and advise the WRU Safeguarding Panel and present the evidence gathered for a safeguarding decision to be made based on the balance of probabilities.

If the panel decide that safeguarding measures should be issued, then this would be communicated to the Person Subject of Concern, who if requested will be provided with written reasons for the decision.

The outcome should be reached by examining the evidence to decide on a finding of fact, based on the balance of probabilities.

WRU Safeguarding Panel Outcomes

When an investigation has been completed and the matter heard by the appropriate panel there are a number of potential outcomes -

No Further Action

The WRU decide that NFA needs to be taken as there is no evidence of a risk presented by the individual.

Written Warning

This sanction would be issued if there was evidence of poor practice, and the WRU decide that action should be taken.

The PSC should be issued with a written warning to remind them of their responsibilities, and the consequences of not complying with the Codes of Conduct and/ or the Safeguarding Policy.

Final Warning

This sanction would be issued if there was evidence of poor practice, and the WRU decide that action should be taken.

This may be a secondary sanction (i.e. written warning issued previously) and the person should be issued with a final warning to remind them of their responsibilities, and the consequences of not complying with the Codes of Conduct and/ or the Safeguarding Policy. (A final warning can be issued without a previous written warning being issued)

Educational and Learning Interventions

This type of intervention would be applied where there is evidence that a person presents a risk, but the WRU Safeguarding Panel decide that the risk can be mitigated and addressed through an appropriate education intervention.

There may be an indication of a lack of competence, or it may be a minor ethical behaviour issue, that could be addressed through appropriate training, raising awareness or advice and guidance.

In the first instance a learning intervention sanction may be applied to deal with these so that guidance can be provided in relation to correct methods (i.e. coaching style etc.) or to encourage them to modify their behaviour in line with the Codes of Conduct, and the Safeguarding Policy.

An example of some of the learning interventions that may be imposed are attending a coaching course, safeguarding awareness training, safeguarding and protecting children training or integrity training.

This training may be delivered as part of a group with others or in a one to one situation with a member of the WRU Safeguarding Team or Coach Development Team.

If the PSC fails to engage with the WRU within 21 days of notification, then the matter would be referred back to the Panel to consider alternative sanctions, which may be more restrictive, such as a suspension.

Deferred Conditional Suspension Order (DCSO)

This sanction would be applied where there is evidence of a specific risk that can be managed appropriately without a suspension being issued (see above)

The PSC is required to comply with conditions that are imposed. The suspension is deferred, and if the conditions are not complied with, in line within the required timescale, it will remain in place until those conditions are complied with. If the PSC does not comply within the timescale, then the matter will be referred to the WRU Safeguarding Panel to consider alternative measures such as a Permanent Suspension.

An example of some of the conditions that could be applied are attending a coaching course, completing a Safe Recruitment Risk Assessment, monitoring or supervision order. The WRU

Safeguarding Panel has the discretion to issue whatever measures they consider proportionate and justified.

Permanent Suspension Order (PSO)

This sanction would be applied where on the balance of probabilities, there is evidence that the person presents a risk to children or adults at risk within the sport, and the WRU Safeguarding Panel decide that action should be taken, and the person should therefore be permanently suspended from the sport.

Permanent Exclusion Order (PEO)

If the WRU decide that safeguarding measures should be imposed, and there is justification they can issue a PEO to a volunteer or staff member who is due to take up a role within the sport.

An example of this is where a person expresses an interest in coaching children or adults at risk, but refuses to complete a DBS check, or there is information to question his/ her suitability for the role, based on a safeguarding concern.

The prospective coach is not in post so cannot be suspended, but could be excluded from that position, if the WRU decide that there is a safeguarding risk presented.

The Panel must be satisfied that the person presents a risk that cannot be managed without a PEO being issued, and that this is a proportionate response to the risk.

The WRU will specify if the suspension is from all rugby related activity, or only from specific groups i.e. Children (under 18 rugby), Women and Girls rugby, Adults at Risk, or Mixed Ability rugby.

Monitoring and Supervision Order (MSO)

If the WRU Safeguarding Panel decide that there should be a period of monitoring and supervision up to three months attached to any orders as a safeguarding measure, then the PSC will be notified of this.

The monitoring or supervision may be conducted by a specified individual i.e. WRU staff member, Club Safeguarding Officer or other appropriate person either in the club or nominated by the WRU.

The monitoring or supervision would be for a period of time decided by the panel, up to a maximum of three months.

Other Safeguarding related sanctions

The WRU Safeguarding Panel also have the authority to issue any other safeguarding measures or sanctions that they feel is appropriate. However these decisions have to be justified and

proportionate to the risk presented, again with the welfare of the child the paramount consideration.

Misconduct Cases

These are matters that are investigated as a result of a Code of Conduct complaint. Safeguarding investigations may result in a breach of the Codes of Conduct and if it is felt appropriate, the matter can be dealt with by the WRU Safeguarding Panel or a Discipline Panel with safeguarding panel members appointed.

An example of this may be the involvement of an individual involved in rugby who is not in a Position of Trust. However they may have breached the Codes of Conduct through their role and responsibilities, and would therefore be dealt with through the safeguarding procedures as a misconduct matter.

Disclosure and Barring Service

The WRU have a responsibility as a sport national governing body to consider whether an individual who has received a PSO should be barred from working with children or adults at risk. This will be discussed with other agencies if there is a multi-agency investigation, and the WRU may have the responsibility to submit the referral as the employer, if the subject is a volunteer or member of staff.

Where the concern has been raised outside of the sport, if that person is employed by another agency i.e. education, health etc. then that agency may be required to complete the DBS referral.

If the concern has been raised within the sport, and the person is a volunteer or staff member then the responsibility will be with the WRU to make the referral.

In relation to cases that are resolved through the WRU Safeguarding Panel, the relevant panel will make the decision of whether to refer an individual, in conjunction with the WRU Safeguarding Team.

Notification of Sanctions Issued

The WRU will verbally notify the Person Subject of Concern of the outcome of a panel decision within seven days, and if required they will receive written notification within twenty eight days.

The CSO will also receive verbal notification of the panel decision within seven days, and if required receive written notification by letter within twenty eight days.

Written notification of the decision and sanction issued will be provided to the PSC. However written reasons will only be supplied if these are requested by the PSC within twenty eight days.

Appeal Process

There is a right of appeal against decisions made by the WRU Safeguarding Panel.

Appeals against Safe Recruitment or low level concerns are heard by the WRU Appeal Panel. Appeals against a WRU Safeguarding Panel decision will be heard by an Independent Appeal Panel.

If the PSC wishes to appeal a decision then they must notify the WRU Safeguarding Team in writing within fourteen days of the date of receiving the written notification regarding the WRU Safeguarding Panel decision. The appeal should outline the grounds for their appeal in writing and a summary of the evidence on which they will rely at the hearing.

The responsibility to appoint and convene the Appeal Panel sits with the WRU Safeguarding Team. The hearing will take place within twenty eight days of the appeal notification being received. However if there are exceptional circumstances then the hearing date can be heard outside of that timeframe. This decision will be made by the Appeal Panel in conjunction with the WRU Head of Policy and Integrity.

The PSC will be notified by e-mail or letter of the time, date, venue and procedures, and offered the opportunity to have a personal hearing or submit written representation to the Appeal Panel. The PSC will be entitled to bring a representative to the hearing with them if they require support or guidance, and or any witnesses to support their case.

The WRU will be represented at the meeting, and will present the case to the panel, and the PSC will have the opportunity to present their case and challenge any of the previous decisions made.

The PSC will be notified of the outcome of the panel hearing verbally within seven days and if a written decision is requested, they will be notified with the written reasons within twenty eight days.

Media Interest

Incidents of child or adult abuse can generate significant media interest. When a strategy meeting is convened this will very often be one of the issues discussed, and a lead agency will be identified to manage this process, particularly in high profile cases.

Anyone who is approached by the media should refrain from providing any information and should follow the below guidance:

- Do not make any initial comment until advice is sought
- Take a note of the journalist's name and contact details and whom they represent
- Establish exactly what information the journalist requires
- Establish whether the journalist is working to any deadlines and inform them that the matter will be referred to the WRU to discuss a response
- Inform the appropriate Club Safeguarding Officer or person in charge who must refer the matter to the WRU Safeguarding Team, who will assist in formulating an appropriate response in consultation with the WRU Communications Dept.
- A copy of the response will be sent to the journalist and other relevant individuals

Data Protection

When a WRU safeguarding investigation is conducted, the WRU will collect and share various pieces of personal data, which may include 'special category' personal data, belonging to both adults and children.

The reasons for doing so are to safeguard children and individuals at risk, and to ensure compliance with other legal obligations and requirements concerning working with children or adults at risk. As a national governing body, we have a legitimate interest in ensuring that children can participate in rugby within a safe environment, and that is our legal basis for collecting the information.

Where possible, the WRU will follow clear principles of confidentiality in relation to information obtained during a safeguarding investigation. However, it is a legal requirement that agencies and professionals work together around safeguarding issues, and there will be occasions when it is appropriate to share information in order to protect the best interests of a child. Therefore, we can never give assurance of absolute confidentiality. Information will only be shared on a 'need to know' basis and when it is in the best interests of a child or individual.

Where possible, we will seek informed consent before sharing information, however if this is not possible it may be necessary to override this requirement – especially if an individual is at risk. The Data Protection Act 2018 allows organisations to share sensitive information about individuals without their consent in some limited circumstances. They are:

- To protect the vital interests of an individual – the vital interests condition also extends to any other individual who might be impacted by abuse.
- Where the individual lacks capacity to give meaningful consent.
- Where the use of information is for the provision of social care, treatment, system and services.

The WRU takes its obligations in relation to the handling and storage of personal information extremely seriously. More information about this can be found in the WRU Group's Privacy Policy, which can be found at <https://www.wru.wales/legal/legal-and-privacy/>

Support Services

Both the victim of abuse and anyone who is investigated for allegations of abuse may benefit from information about support services. It is also useful to provide this information for anyone else who has been affected by an incident of abuse, including family members, those involved in responding to the incident, and sometimes parents, guardians, carers or club members.

Anyone who has made a disclosure of abuse, has been the subject of an allegation, or has been indirectly affected by an incident will be offered information on support services.

Anyone within the organisation who is the subject of an abuse allegation will also be provided with contact details for support services they may require.

If these services are required please contact the WRU Safeguarding Team who will assist in facilitating this process.

Support for Clubs

Clubs must adopt the principles of the WRU Safeguarding Policy and work closely with the WRU Safeguarding Team. Clubs should also be aware of their responsibilities in terms of safeguarding throughout the club. There needs to be an inclusive approach to adults at risk, and a child centred approach to ensure that everyone has a positive experience from rugby.

Culture is the underlying thread that sets the tone and feeling of a community rugby club. Your standards are set by the committee and leadership of the club, and should encompass shared beliefs, customs, traditions and be underpinned by the values of the WRU.

The club culture should ensure that your club is an inclusive and welcoming environment so that people in your community develop a sense of belonging for the club, with a people first philosophy.

Culture is everyone's responsibility and great leadership challenges poor behaviour. Don't be a Bystander.

Clubs must have the following in place to provide support to anyone who wants to report a concern :

- Safeguarding Policy (WRU Policy or a specific Club Policy).
- Club Safeguarding Officer.
- Appropriate vetting procedures (Safe Recruitment).
- Club Operations Manager (Promoting Positive Behaviour and Match Day Protocols).
- CSO Poster in the club with CSO contact details and circulation of this to key groups within the club.
- Promoting Safe and Inclusive Environments internally and externally (social media) – WRU Safeguarding Policy, Codes of Conduct, Coaches Code of Practice and Match Day Protocols.

Everyone must promote the benefits of safeguarding and promoting positive behaviour in the game.

The WRU will provide safeguarding and positive behaviour support through the following -

- WRU Policy and Integrity (Safeguarding, Player Welfare, Anti-Doping, Discipline and Misconduct).
- WRU Coach Development.
- WRU Club Development.
- WRU Discipline Committee.
- WRU Community Rugby Departments.

Club Procedures for Managing Cases - Club Mediation and Dispute Framework

There may be occasions where a poor practice, behavioural issue or a misconduct matter is identified in a club, and the matter is dealt with internally by the club without referral to the WRU.

The Club is responsible for establishing a robust, disciplinary framework in the event that a dispute and/or complaint arises between its Members. Members should be defined as being

any Member of the Club – Coaches, Officials, Team Managers, Players, Support Personnel, Club Employees and extended to its Spectators and (where appropriate), Parents.

The Club shall ensure that there is in force at their Club a fair and effective disciplinary policy applicable to its Members and shall ensure that it is applied fairly, consistently and objectively when dealing with a complaint and/or dispute arising from its Members.

For the avoidance of doubt, if the Club Safeguarding Officer, Club Integrity Officer or the Club Management Committee feel that the complaint or concern raised is a safeguarding matter, then they should consult with the WRU Safeguarding Team, who will consider the initial report and decide whether this is a case which can be dealt with by the Club or whether it should be dealt with by the WRU.

Best Practice Guide:

The person against whom the complaint has been made:

1. Must be informed of the nature of the complaint in writing.
2. Must be provided with a copy of any report or other information which will be considered by the Panel.
3. Must be invited to attend the meeting which should be held at a convenient time for them.
4. Must receive sufficient notice of the hearing.
5. Must be given the opportunity to provide a verbal or written account and call witnesses.
6. Must be allowed to hear or see evidence supporting the complaint; however minors should not be required to give evidence in person and can provide evidence in writing.
7. Must be allowed to have representation at the meeting.

There may also be information which is confidential to the complainant or where the source has requested anonymity for fear of retribution;

Best Practice – Arranging the Disciplinary Hearing

A Disciplinary Panel should be convened which should consist of three members:

1. None of whom should have been involved in reporting the case or have a conflict of interest (i.e. a close friend of the individual who is subject to allegations).
2. At least one of whom should be a Senior Management member from the Club.
3. If the complaint relates to a coaching matter, it is recommended that one member should have coaching experience.
4. If there is an independent person who can assist and be appointed as a panel member this will provide increased independency and transparency in the process.
5. If there is an independent legally qualified person available to assist and be appointed as a panel member, then this should also be considered.
6. The WRU may be able to recommend and/or provide a WRU judicial officer to sit on the Club's disciplinary Panel.

Best Practice - The Written Decision

A written record should be kept of any meeting or hearing, setting out who attended, a brief outline of the proceedings, and the reasons for the decisions taken, including any sanction applied.

The reasons given should be sufficiently detailed to enable the Member to understand the rationale for the decision and for any sanction applied.

It is not normally necessary to make an oral recording or full transcript of the meeting or hearing, but it may be helpful to do so, particularly where the case is complex, or there is a significant factual dispute. It is important to seek consent prior to the hearing taking place.

Safeguarding Support and Resources

There are a number of other resources available that can assist clubs and affiliated bodies develop safe and inclusive environments to deliver great rugby experiences:

- WRU Safeguarding Kit Bag
- Coaches Code of Practice
- Cydweithio - Working Together in Welsh Rugby. A Guide for Coaches and Club Safeguarding Officers working with Children and Young People
- Rhieni yn Rygbi Cymru– A Guide for Parents in Welsh Rugby
- WRU Equality, Diversity and Inclusion (EDI) Policy
- WRU Codes of Conduct

S.A.F.E.G.U.A.R.D.I.N.G... IN WELSH RUGBY

Safe Environments	Awareness Be Vigilant	Fairness and Equality	Education Never Stop Learning
Guide and Support Players and Coaches	Understand your Role as a CSO	Action Don't be a Bystander	Recruitment Safe Recruitment Policy
Duty to Care	Integrity	Never Stop Listening	Groundwork Build a Safeguarding Culture

Safeguarding Contacts

Contact Details	Telephone Number	Email
Welsh Rugby Union Integrity Line	02920 822200	integrity@wru.wales
NSPCC National Centre	0808 800 5000	help@nspcc.org.uk
Childline UK	0800 1111	
Ann Craft Trust	0115 951 5400	



DON'T BE A BYSTANDER

If you have any concerns please contact
the WRU Safeguarding Team

Integrity Line
02920 822 200

Safeguarding Mailbox E-mail
safeguarding@wru.wales

DON'T TACKLE IT ALONE

