



FULHAM REACH BOAT CLUB

EST. 2014

## **Safeguarding Policy**

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## Introduction

Fulham Reach Boat Club (“**FRBC**”) acknowledges its duty of care to safeguard and promote the welfare of children, which is defined by the government’s [Working Together to Safeguard Children](#) guide as:

- protecting children from maltreatment
- preventing impairment of children’s health and development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

FRBC is committed to ensuring its safeguarding practice reflects and complies (at a minimum) with its statutory responsibilities, government guidance, best practice and as a British Rowing affiliated rowing club, British Rowing’s Safeguarding Policy (“**BR Policy**”).

The BR Policy is attached at *Annex 1* for convenience and this Policy will draw attention to sections of that policy where relevant.

## 1. FRBC’s Safeguarding Commitments

FRBC’s Safeguarding Policy (“**the Policy**”) recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation or socio-economic background, all children:

- have a positive and enjoyable experience of sport at FRBC in a safe and child centred environment
- are protected from abuse whilst participating in rowing or outside of the club.

FRBC acknowledges that some children, especially those who are disabled, young or from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to promote their welfare. As part of the Policy FRBC will:

- promote and prioritise the safety and wellbeing of children and young people
- ensure everyone understands their roles and responsibilities in respect of safeguarding
- ensure everyone is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse and other safeguarding concerns relating to children and young people
- ensure appropriate action is taken in the event of an incident/concern of abuse
- provide support to individuals who raise or disclose incidents/concerns
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals
- ensure robust safeguarding arrangements and procedures are in operation concerning children, young people and those who hold positions of trust.

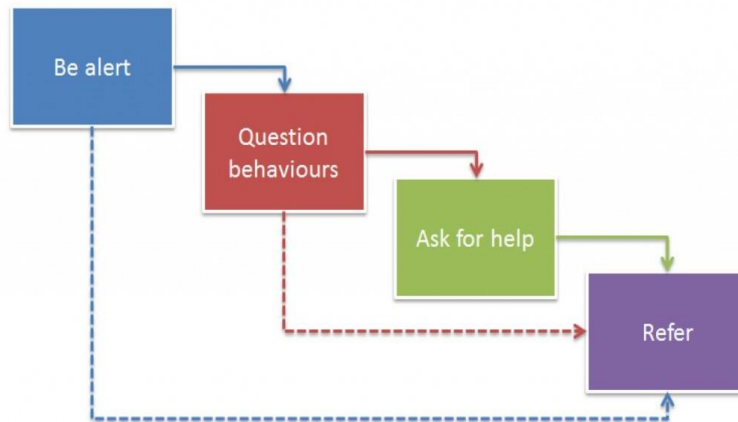
The Policy will be widely promoted and is mandatory for everyone involved with FRBC. Failure to comply with the Policy will be addressed without delay and may ultimately result in dismissal/exclusion from the club.

## 2. Monitoring of this Policy

The Policy will be reviewed a year after development and then every three years, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Partnership, UK Sport, Home Country Sports Councils and British Rowing
- as a result of any other significant change or event.

### 3. What To Do If You Are Worried A Child Is Being Abused



Everybody at FRBC must **be alert** to the abuse of young people. It is important that all staff, members of the Board of Trustees (“**Trustees**”) and volunteers **question inappropriate behaviour** or behaviour which is not in line with FRBC’s Code of Conduct (attached at *Annex 2*). If you suspect abuse, it is important you **ask for help** by notifying the Designated Safeguarding Lead (“**DSL**”), either verbally or in writing. The DSL will **refer** the matter to British Rowing and any external agencies (e.g. the Multi-Agency Safeguarding Hub (“**MASH**”) or Children’s Social Care Services).

FRBC’s **DSL** is Yolande Joubert – [yolande@fulhamreachboatclub.com](mailto:yolande@fulhamreachboatclub.com)

FRBC’s **Deputy DSL** is Steve O’Connor – [steve@fulhamreachboatclub.com](mailto:steve@fulhamreachboatclub.com)

FRBC’s **Trustee DSL** is David FitzHerbert – [david@progressioncap.com](mailto:david@progressioncap.com)

**IF A CHILD IS AT IMMEDIATE RISK CONTACT THE POLICE USING 999 OR  
MASH IN HAMMERSMITH & FULHAM ON 020 8753 6610**

All telephone referrals to the above should be confirmed in writing within 24 hours. You should record the following:

- name and job title of the member of staff to whom the concerns were passed
- the time and date of the call
- a summary of the information shared and the response received.

#### 1. Be Alert

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. It is not the responsibility of those working in rowing to decide that child abuse is occurring, but it is their responsibility to act on any concerns.

The following indicators of neglect, physical abuse, emotional abuse/bullying and sexual abuse are taken from the BR Policy:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries or an injury for which an explanation seems inconsistent
- the child describes what appears to be an abusive act or relationships involving him/her
- the child suggests that they are being groomed into gang or county lines activity, extremist or radical views, or are being sexually exploited.
- someone else expresses concern about the welfare of a child
- unexplained changes in a child's behaviour e.g. becoming very quiet, withdrawn, displaying sudden outbursts of temper or their behaviour changing over time
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of adults, particularly those with whom a close relationship would normally be expected
- difficulty in making friends
- being prevented from socialising with other children
- displaying variations in eating patterns including overeating or loss of appetite
- losing weight for no apparent reason
- becoming increasingly dirty or unkempt.

Please find attached at *Annex 3* a more detailed list of indicators of abuse.

## 2. Question Behaviours

You may have concerns about abuse/poor practice because:

- you see it happening
- you recognise signs such as those listed in section 4(1) *above*.
- someone reports it to you
- a child approaches you directly.

If a **child says or indicates that they are being abused**, or you have concerns about their welfare you should:

- take what they say seriously
- react calmly so as not to frighten them
- tell them they are not to blame and that it was right to speak up
- recognise that there may be inherent difficulties in interpreting what is said by someone who has a speech disability and/or differences in language
- keep questions to an absolute minimum so that there is a clear and accurate understanding of what has been said. Ask a couple of open-ended questions (if necessary) in order to understand what the child or young person is telling you.
- avoid asking leading questions such as "Was it X who did this?" Instead say, "Is there anything else you want to tell me?"

- reassure them, but do not promise to keep the matter secret – explain that to resolve the problem it will be necessary to inform other people as appropriate
- the safety of the child is paramount - if the child needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a child protection issue.

**Record all of the above** using the form contained at *Annex 4*. When completing the form you should:

- confine yourself to the facts – what you have observed/seen, heard or had reported to you
- distinguish between your own understanding of events (e.g. what was said, by whom, the circumstances in which this arose, etc.) and what you have been told by others
- not include your own opinions on the matter
- be clear where you are giving either your own or others' interpretation of events and the reasons for this (e.g. context, individual's response to challenge, etc.)

You are recording this information for:

- yourself, so you have a record of what happened
- the DSL or in their absence, the Deputy DSL, or the Trustee DSL, who will co-ordinate any action that needs to be taken
- MASH or Children's Social Care Services.

It is not appropriate to share sensitive and confidential information with other people (e.g. members of FRBC or acquaintances outside rowing).

### 3. Ask for help

The discovery that someone you know may be abusing a child will raise concern. Although it can be difficult to report such matters, you must remember that:

- the welfare of the child is paramount
- being vigilant helps to protect children
- everyone has a duty of care to report any concerns they have immediately
- a good reporting structure ensures that concerns are dealt with fairly according to procedure and in a timely manner.

#### **Who should I speak to?**

As stated above, all concerns that you may have or receive should be recorded using the form contained at *Annex 4* and passed onto the DSL **or in their absence**, the Deputy DSL, or the Trustee DSL, who will co-ordinate any action that needs to be taken. They will coordinate with British Rowing's Lead Safeguarding Officer ("**LSO**") as appropriate. The DSL is responsible for ensuring that any reports are documented in FRBC's safeguarding folder and that the reporting flow chart which has been adapted from British Rowing is followed.

## **FRBC Safeguarding Policy**

If concerns arise in a setting where you are not at the club (e.g. at a school) inform the member of staff with responsibility for child protection or welfare e.g. the DSL or Deputy DSL in a school. Always ensure, in these circumstances, that FRBC's DSL is informed of the referral.

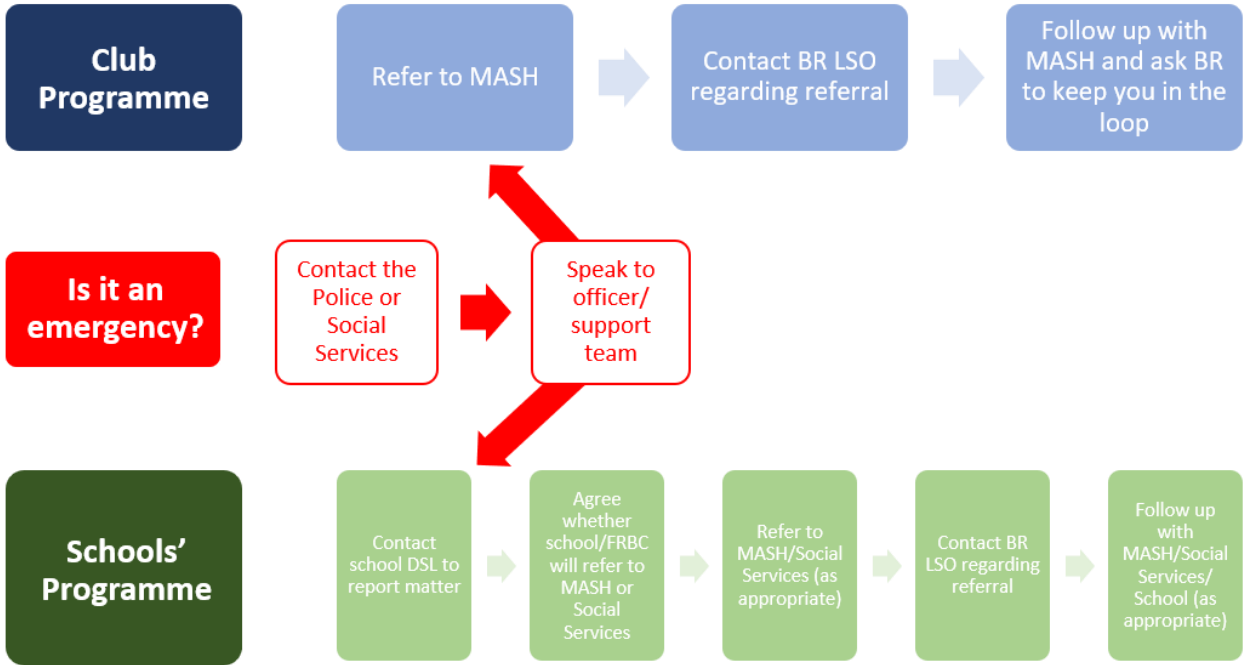
When with rowers away from home, inform the person who has responsibility for welfare on that trip. This may be the trip DSL, head coach or team leader.



### 4. Refer

This section and *Appendices 5 and 6* apply only to the DSL or in their absence, the Deputy DSL, or the Trustee DSL.

Below is a diagram setting out the basic DSL reporting process depending on whether the matter concerns the club, the Schools' Programme or an emergency.



Please see *Annex 5* for more detailed guidance on the DSL reporting process and *Annex 6* for the types of matters that should be reported to the Charity Commission.

### 4. FRBC Professional Behaviour Policy

FRBC Trustees, the CEO, the DSL and Deputy DSL expect all staff to comply with FRBC's Codes of Conduct, which can be found at *Annex 2*.

Staff must also comply with the below Professional Behaviour Policy in respect of safeguarding. This includes periods away from FRBC at competitions and en route to such events.

1. **No child is to be left alone** with an adult in any situation at the club, whether that be in changing rooms, club facilities or on the water. For example, a private coached session can only be booked with two juniors and one coach (or with a parent/guardian accompanying) and there must be at least two adults or two juniors in all adult/junior interactions.
2. **Staff, Trustees and volunteers are only to use the accessible bathroom** and not the general changing rooms.
3. **Adult members shall not use the same changing facilities as children** when on site at the same time. This will be monitored by the lead junior coach on the session.
4. **No unnecessary physical contact** will occur towards any children. On rare occasions minimal contact may be required to assist with coaching. A staff member must communicate the purpose of such contact and obtain permission before doing so. There must be at least two adults or two juniors present in such interactions.
5. The **DSL will make annual contact** with the designated safeguarding lead of each school and immediate contact if a safeguarding issue arises.
6. **Safeguarding announcements and displays** will be placed on the FRBC notice board to ensure everyone within the club knows what to do if they have a safeguarding concern or from where they can receive support.
7. All staff have a professional duty to conduct themselves as a **trusted role model** inside of work, outside of work and online.

## **5. FRBC Staff Training**

Termly team training is provided for staff members to keep up to date with safeguarding requirements and procedures. Training will enable staff to:

- Identify when children are at risk
- Take thorough and effective preventive action
- Respond in the most appropriate way to children who are suspected of being abused
- Report their concerns appropriately
- Support children, staff and family members
- Recognise their responsibilities about suspected poor practice or possible abuse by staff who hold positions of trust within the club.

Every member of staff:

- Will have their safeguarding certificate of training updated every three years by a British Rowing recognised provider.
- In a coaching position is required to be hold (or be working towards) a UKCC Level 2 Rowing Coaching qualification and have up to date first aid certificates.

The above will be monitored via the Staff Training Matrix. Records of training attendance and content will be kept by the DSL.

## 6. Recruitment

### Recruitment Process

FRBC conducts rigorous recruitment and selection processes. To that end, FRBC has a specialist interviewing panel of individuals who have undergone safeguarding training in recruitment. The key stages of FRBC's recruitment process are as follows:

1. Scope out the role
2. Invite potential candidates for interview
3. Interview and documentation review
4. Successful interviewees shadow staff prior to engagement (where appropriate)
5. Advanced DBS check is completed
6. Contract signed
7. Candidate is reviewed against training matrix to identify areas for development.

### Application process

Every prospective employee will be expected to:

- Complete an application form. This will help assess the applicant's suitability to work with children based on their skills and competencies as well as eliciting information about an applicant's past
- Provide a self-disclosure about any matter that might influence their suitability to work with children
- Provide two referees
- Provide details of previous volunteering experience or relevant employment
- Provide evidence of their identity (such as a photographic driving licence or passport)
- Complete a criminal records check at the enhanced level for the specific role.

## 7. Online and Communications Safeguarding

In accordance with FRBC's Staff Handbook, staff are expected to make all social media accounts private enabling no visibility for any child and are prohibited from connecting with children via social media.

Communication with children must be through a public means. Any email, text or message communication must never be 1:1, they must always include a parent, teacher or another member of staff.

## 8. Offsite Safeguarding

For any off-site trips or plans, FRBC ensures there are two or more members of staff in attendance. Where there are multi-gender groups a staff member of each gender will assist. Key points:

- No child is to travel alone with an adult
- All off-site provider of activities will have their safeguarding policy cross-checked against how it relates to FRBC activities and participants
- The DSL will approve the safeguarding aspect of risk assessments for off-site activities.

## 9. External Agency Relationships

FRBC will maintain a good working relationship with MASH, Children's Social Care Services and the Police, and be familiar with the laws that serve to protect children from abuse. FRBC will consult with MASH, Children's Social Care Services and the Police (and other appropriate agencies that have specialist knowledge) to help FRBC protect children from abuse.

FRBC will ensure that it has contacts for MASH, Children's Social Care Services and Police offices. The DSL will maintain this information. Contact details for MASH can be found at *Annex 5*.

## 10. Confidentiality and Data Protection

Staff should be aware of their professional duty to share information regarding abuse whatever the source. This information should be shared with the DSL. The DSL, will discuss this matter with the staff member and decide on the best course of action. Information sharing will be restricted to those who have a need to know in order to protect children. Once staff members' have talked with the DSL, all parties should ensure that confidentiality is observed.

Information sharing will be restricted to those who have a need to know in order to protect children.

Staff may be asked to provide information to MASH and other appropriate agencies.

The DSL should be aware of the government's Seven Golden Rules of Information Sharing, which are attached at *Annex 7*. Please refer to FRBC's data protection policy for data retention guidelines.

# 11. Complaints and Comments

If you have any complaints, comments or suggestions about this Policy, please email Steve O'Connor on 020 3356 7154 or [steve@fulhamreachboatclub.com](mailto:steve@fulhamreachboatclub.com).

Signed \_\_\_\_\_  
David FitzHerbert, Chairman

Date: \_\_\_\_\_

Signed \_\_\_\_\_  
Steve O'Connor CEO

Date: \_\_\_\_\_

**Annex 1: British Rowing Safeguarding & Protecting Children Policy**

**Annex 2: Code of Conduct – Coaching Policy**



## Annex 3: Indicators of Abuse

Abuse is 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

### Physical abuse

A form of abuse which 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.

### 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 children 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 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 seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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.

### Sexual abuse

Sexual abuse 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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

*Child sexual exploitation* is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the

financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Bullying**

Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves. Bullying results in pain and distress to the victim. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Bullying can be:

- Emotional being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting (e.g. hiding kit, threatening gestures)
- Physical pushing, kicking, hitting, punching or any use of violence
- Racist racial taunts, graffiti or gestures
- Sexual unwanted physical contact or sexually abusive comments
- Homophobic because of, or focussing on, the issue of sexuality
- Verbal name-calling, sarcasm, spreading rumours, teasing.

Bullies come from all walks of life. They bully for a variety of reasons and may even have been bullied or abused themselves. Typically, bullies can have low self-esteem, be excitable, aggressive or jealous. Bullies can be boys or girls, men or women. Although bullying often takes place in schools, research shows it can and does occur anywhere where there is inadequate supervision – on the way to and from school, at a sporting event, in the playground or changing rooms. Competitive sports such as rowing are an ideal environment for the bully.

In rowing, the bully can be a:

- Parent who pushes too hard
- coach who adopts a 'win at all costs' philosophy
- Rower or cox who intimidates or ridicules a peer
- club official who places unfair pressure on a person
- spectator who constantly shouts abuse See the model Anti-Bullying Policy for rowing clubs.

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children. A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of, and investigate, these possible signs if a child:

- says they are being bullied
- is unwilling to go to club sessions
- becomes withdrawn, anxious or lacking in confidence
- feels ill before training sessions
- has clothes torn or possessions damaged
- has possessions go 'missing'
- asks for money or starts stealing money (to pay bully)

- has unexplained cuts or bruises
- is frightened to say what's wrong
- gives improbable excuses for any of the above.

In more extreme cases:

- starts stammering
- cries themselves to sleep at night, has nightmares or wets the bed
- becomes aggressive, disruptive or unreasonable
- is bullying other Children or siblings
- stops eating
- self-harms
- attempts or threatens suicide or runs away.

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and be investigated.

### **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 occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

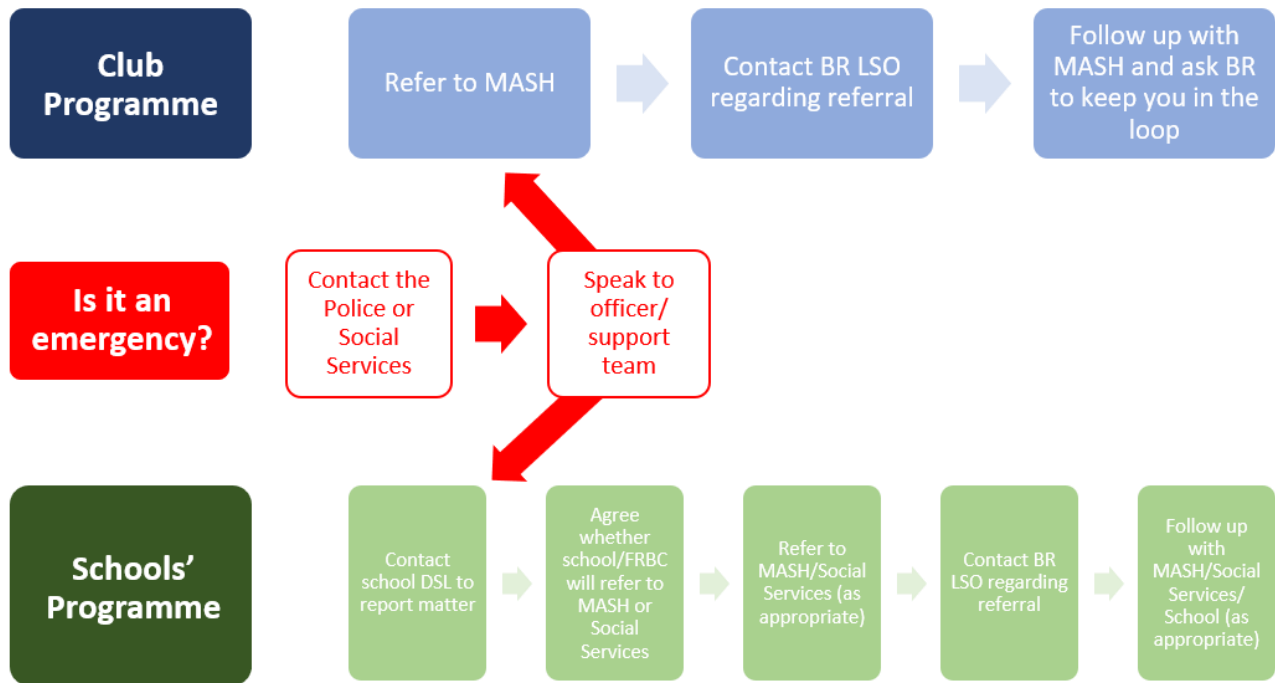
### **Extremism**

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

**Annex 4: Recording Form**

## Annex 5: DSL Referral Process

Below is a diagram setting out the basic DSL reporting process depending on whether the matter concerns the club, the Schools' Programme or an emergency.



### Involving Statutory Agencies

In any case of physical or sexual abuse or where the child's safety is at risk, you should contact one of the following statutory agencies immediately:

- The Police should be involved if the apparent abuse is of a criminal nature or if the incident involves a person outside the child's family. A record should be made of the crime reference number
- Children's Social Care Services where the alleged person is a member of the child's family. In an emergency the Samaritans (08457 909 090) will hold the duty officer's contact number.
- NSPCC (Freephone 24 hour helpline 0808 800 5000). You do not have to give your name but it is helpful if you can.

### Refer to MASH

Multi-Agency Safeguarding Hub ("MASH") is made up of co-located staff from Children's Social Care, Police and Health Services from across the boroughs of Westminster, Hammersmith and Fulham, and Kensington and Chelsea with named link workers for Probation Housing and Youth Offending Team. A dedicated Education Worker coordinates MASH links with schools.

MASH operates from 09:00 - 17:00 Monday to Friday, and is based in Frampton Street, London, NW8 8LF. MASH takes referrals from the Police and from the local authorities in Hammersmith and Fulham, Kensington and Chelsea, and Westminster.

If you have a concern about a child, please make your referral to the relevant local authority front door, and where appropriate, the local authority will refer cases to the MASH team:

- Hammersmith & Fulham - 020 8753 6610
- Kensington and Chelsea - [socialservices@rbkc.gov.uk](mailto:socialservices@rbkc.gov.uk) or 020 7361 3013
- Westminster - [accesstochildrensservices@westminster.gov.uk](mailto:accesstochildrensservices@westminster.gov.uk) or 020 7641 4000

For MASH general enquiries please contact the Tri-Borough MASH Team Manager, Catherine Hoy at [choy@westminster.gov.uk](mailto:choy@westminster.gov.uk) or talk to the designated MASH lead for your agency.

### Contact the LSO

The LSO must be informed of all allegations of abuse and persistent poor practice as soon as possible in order to decide the following:

- what further action should be taken by the club or British Rowing
- whether further action, advice or investigation is needed by/from the Police, Children's Social Care Services or the NSPCC.

Passing on this information is important because the matter may be just one of a series of other instances which together cause concern. It enables British Rowing's Case Management Group and British Rowing's Safeguarding Vulnerable Groups Panel to analyse trends across clubs and improve existing British Rowing policy and guidance.

Any letters to the LSO regarding referrals should be marked 'PRIVATE AND CONFIDENTIAL' and sent to: British Rowing, 6 Lower Mall, London, W6 9DJ. Alternatively the LSO can be contacted on 0208 237 6700. The LSO or another designated person from British Rowing will keep you notified of procedures and timescales whilst any investigation is ongoing.

### Will parents or carers be involved?

In most situations, it is important that the DSL or LSO involves parents to clarify any initial concerns e.g. if a child seems withdrawn, they may have experienced a recent bereavement.

Where a parent or carer may be responsible for the abuse or may not be able to respond to the situation appropriately they should not be involved, as it may place the child at greater risk. It is advisable to contact MASH to establish an appropriate route forward.

### Disclosure of previous abuse

Allegations of abuse are occasionally made some time after the event, for example by an adult abused as a child by a member of staff who is still working with children. Where such an disclosure is made, a referral should be made to MASH, as identified in the process set out above.

if an allegation is made against a person who holds a position of trust (or used to) this should be referred by the DSL to the Local Authority Designated Officer.

You should follow the procedures given above and have the matter reported to the Police and/or Children's Social Care Services and the LSO. This is because other children, either within the sport or outside it, may be at risk from this person.

### Allegations against People in Positions of Trust

- When an allegation against a person in a position of trust is reported, FRBC will follow British Rowing protocol after making its own decision on the allegation, this will be in line with FRBC's disciplinary procedures.
- If an individual is suspended from their role it is important to remember this is a neutral act, it protects all parties involved in the case.
- They will be assigned a designated contact from British Rowing. This person will be their point of contact for the duration of the case, if they have any queries or concerns they should contact them initially.
- The individual's designated contact will be neutral to the case, they will not be the designated contact for the young person involved in the case, nor will they be a member of British Rowing's Case Management Group who will be dealing with your case.
- The individual will receive regular communication in the form of telephone calls, letters and emails regarding their case from their designated contact. They will be kept up to date with the progress of their case at all times.

If a case is being investigated by a statutory agency, British Rowing may suspend the individual concerned whilst this investigation is taking place. This is a neutral act and is not intended to prejudge the outcome of the investigation, but simply to remove the individual from contact with children until the investigation is concluded. Once the statutory agency's investigation is completed, and irrespective of its findings, British Rowing will assess the case following its disciplinary procedures.

See section 7 of the BR Policy policy for further details.

### Involving the Charity Commission

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within FRBC, it is important that there is prompt, full and frank disclosure to the Charity Commission. It is the **responsibility of the Trustees** to decide whether an incident is significant and should be reported.

Any report needs to include what happened and how the matter is being dealt with (even if FRBC has also reported it to the Police, donors, etc.)

## FRBC Safeguarding Policy

To help assist in determining reportable matters, there is an Examples Table at *Annex 6*. The Examples Table is not a definitive list of reportable incidents but indicates the types of incidents that should and should not be reported. Further information on reporting to the Charity Commission can be found [here](#).



**Annex 6: Reporting to the Charity Commission: Examples Table**

## Annex 7: Government Advice – The Seven Golden Rules to Sharing Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.