



IGAT

SAFEGUARDING CHILDREN & VULNERABLE ADULTS POLICY

Version 1.0



Version History

Version	Summary of amendments/changes	Published Date
Version 1.0	Document Created	July 2024
Version 1.1	Document Updated - Appendices Added	November 2024

Contact Information

IGA Office	info@igauk.com / 0345 319 7000
Safeguarding Team	safeguarding@igauk.com
Kylie Downie	safeguarding@igauk.com

Contents

Part One

- Overview
 - Background
 - Purpose
 - Scope
 - Policy Statements
 - Definitions
 - Roles and Responsibilities
-

Part Two

- Overview
 - Safeguarding Responsibilities
 - Recognising Signs and Indicators of Abuse
 - Poor Practice
 - Responding to a Disclosure
 - Information Sharing
 - Reporting Concerns
 - Whistleblowing
 - Responding to Incidents
 - Investigation
 - Criminal Convictions
 - Retention of Records
-

Part Three

- Procedures Section 1 - Reporting concerns about a child or children
- Appendix 1 - Categories of abuse defined in working together to safeguard children
- Appendix 2 - Categories of abuse defined in working together to safeguard adults
- Appendix 3 - Poor Practice
- Appendix 4 - Key Indicators of Abuse
- Appendix 5 - Recording Concerns
- Appendix 6- Responding to Disclosure
- Appendix 7 - Information Sharing to Protect or Promote the Welfare of Children and Adults at Risk
- Appendix 8- Consent and Mental Capacity



Overview

At the Independent Gymnastics Association (IGA), safeguarding and protecting children and vulnerable adults is our highest priority. This commitment is firmly rooted in compliance with the latest UK safeguarding laws and regulations, and the statutory guidance. These frameworks underscore the shared responsibility of organisations, staff, volunteers, and the wider community to provide a safe and supportive environment for all individuals.

We recognise that children and vulnerable adults face distinct risks and challenges, and we are dedicated to promoting their well-being. For children, this involves ensuring they grow up in environments free from abuse, neglect, or exploitation, with their welfare placed at the heart of all decisions. For vulnerable adults, our safeguarding approach focuses on upholding their rights to independence and self-determination while providing protection from harm, abuse, or neglect, as defined under the Care Act 2014.

Our safeguarding policy sets out clear and practical guidelines for recognising, reporting, and addressing concerns, with specific procedures tailored to the needs of children and adults at risk. This comprehensive approach is reinforced by mandatory training for all staff, coaches, and volunteers, ensuring they are fully equipped to identify and respond to safeguarding issues effectively.

By fostering a culture of vigilance, accountability, and inclusivity, we are committed to upholding the highest standards of safety and care across all our activities. Together, we strive to ensure that every child and vulnerable adult within our gymnastics community feels secure, supported, and empowered to flourish.

Background

Safeguarding is a shared responsibility, and it is essential that organisations work collaboratively to protect individuals who need help and support.

At the Independent Gymnastics Association (IGA), we are committed to safeguarding and protecting all our members, with particular focus on children and vulnerable adults. Their safety and well-being are central to everything we do. Child protection, as part of safeguarding, involves specific measures to protect children who are suffering, or are likely to suffer, significant harm. For vulnerable adults, safeguarding ensures their right to live free from abuse, neglect, and exploitation is upheld.

The Children Act 1989 enshrines the principle that the welfare of children is paramount. Article 19 of the United Nations Convention on the Rights of the Child guarantees the right for every child to be safe from violence. Similarly, the Care Act 2014 provides a statutory framework for safeguarding adults with care and support needs who may be at risk of abuse or neglect. While adults lacking mental capacity are deemed vulnerable, some adults with capacity may still require safeguarding due to disabilities, illness, or other circumstances limiting their ability to protect themselves.



Safeguarding children in England is guided by the statutory framework outlined in *Working Together to Safeguard Children (2023)*. This guidance outlines the duty of all organisations, including sports clubs, to have robust safeguarding arrangements in place. It emphasises the importance of collaboration with local safeguarding partners and specifies that all staff and volunteers must understand their responsibilities in recognising, reporting, and addressing child protection concerns, including making referrals to local authority children's services or the police when necessary.

For safeguarding adults, the Care Act 2014 mandates local authorities to make enquiries where they suspect an adult at risk has experienced or is at risk of harm. Organisations must work with statutory services to provide a protective environment for vulnerable adults while respecting their autonomy.

Recent and historical incidents of abuse and harassment in sport have underlined the importance of safeguarding for all participants. Vulnerable adults, even those not in competitive pathways, are equally at risk and require strong safeguarding practices.

Individuals may be targeted for harassment and abuse based on factors such as their gender, race, religion, sexual orientation, disability, appearance, or athletic ability. Those who are disabled, or identify as lesbian, gay, bisexual, or transgender (LGBT), are often at heightened risk.

Abuse can occur in various settings, including within families, institutions, online environments, or at the hands of peers. It may involve bullying, hazing, exploitation, or power imbalances, and is often perpetrated by someone in a position of trust or authority.

The psychological effects of abuse can be long-lasting, impacting relationships, mental health, and overall well-being. Early intervention and access to support are critical in mitigating these effects.

While sports can provide opportunities for abuse, they also offer a safe haven for individuals experiencing harm elsewhere, such as in their family or community. It is the responsibility of sports organisations to foster this protective environment.

Adults working with children and vulnerable adults are well-placed to recognise signs of abuse, especially when individuals cannot or struggle to express concerns themselves. Awareness, vigilance, and appropriate action are crucial.

Effective information sharing is a cornerstone of safeguarding. Although data protection laws such as the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 must be followed, these laws do not prevent the sharing of information necessary to protect individuals from harm.

Organisations have a leadership role in promoting a zero-tolerance approach to all forms of abuse. This includes addressing poor practice, discrimination, harassment, bullying, hazing, and extremism.

The prevention of abuse and harassment in our sport requires a coordinated, systematic approach involving the gymnastics community and statutory authorities. Effective safeguarding relies on engagement, training, and ongoing support for everyone involved.

Purpose

The purpose of this safeguarding policy is to ensure that all individuals participating in gymnastics activities with the Independent Gymnastics Association (IGA) can do so in a safe and supportive environment, free from harassment, abuse, or neglect. We are committed to safeguarding and promoting the welfare of children and vulnerable adults in all aspects of our work and activities.

Our aim is to create an environment where everyone is aware of their role and responsibility in preventing and responding to concerns about abuse, both within and outside of the gymnastics environment. This includes ensuring that all individuals, whether children or vulnerable adults, are protected from harm regardless of where the abuse may occur. The policy is designed to interpret and implement the latest safeguarding legislation and statutory guidance, ensuring compliance with UK laws such as the Children Act 1989 and 2004, the Care Act 2014, and Working Together to Safeguard Children (2023). This framework will help us meet our legal obligations to protect both children and vulnerable adults under our care.

The key objectives of this policy are to:

- Ensure that all members of IGA understand that any form of abuse, including non-accidental violence, is unacceptable and will not be tolerated.
- Promote a culture where individuals feel safe and supported in raising concerns about someone's welfare, both within the gymnastics environment and beyond, without fear of retaliation.
- Provide clear and coordinated procedures for responding to incidents of abuse or safeguarding concerns, ensuring that any actions taken are in line with the relevant statutory frameworks and best practice.
- Ensure that everyone in the gymnastics community, including staff, coaches, volunteers, and participants, understands their responsibility to report any concerns relating to the welfare of children or vulnerable adults, even if the concerns arise outside the gymnastics setting.
- Establish appropriate safeguarding arrangements to protect all individuals participating in IGA activities, ensuring that safeguards are in place for both children and vulnerable adults.
- Implement preventive measures and promote safe practice to minimise the likelihood of incidents of abuse or harassment.

By maintaining these safeguards, we aim to ensure that all participants in gymnastics activities are given the opportunity to thrive in a safe and nurturing environment, where they are free from fear of abuse or neglect.

Scope

This safeguarding policy and its associated standards and guidelines are mandatory for all members of the Independent Gymnastics Association (IGA). It applies to all individuals involved in IGA activities, including staff, volunteers, coaches, athletes, and any others engaged in the delivery of gymnastics services. The policy extends to any individuals who are part of the IGA community, such as medical personnel, trainers, and agents, regardless of whether they are employed, contracted, or volunteering.



The policy applies to any incidents of abuse or harassment that arise from participation in IGA-regulated activities or IGA-representative events, both within and outside the gymnastics environment. This includes events hosted by IGA or affiliated organisations, as well as any activities where IGA members are representing the organisation.

The responsibility to report concerns extends beyond IGA activities. Any concerns regarding the welfare of a child or vulnerable adult, whether they are experiencing abuse or are at risk outside of gymnastics, must also be reported. This highlights our commitment to safeguarding individuals in all areas of their lives, not just during IGA-affiliated activities.

The policy is applicable to all IGA registered clubs and affiliated organisations involved in the delivery of gymnastics. Additionally, any third-party organisation or individual providing a service to IGA must demonstrate compliance with the safeguarding standards set out in this policy. This ensures that all aspects of IGA's operations, whether directly or indirectly connected, maintain a high standard of safeguarding practice.

In line with the latest UK safeguarding laws and regulations, including the Children Act 1989 and 2004, Care Act 2014, and Working Together to Safeguard Children (2023), this policy ensures that all children and vulnerable adults engaged with IGA are fully protected from harm, abuse, and neglect, both within and outside the gymnastics setting.

Policy Statements

At the Independent Gymnastics Association (IGA), we believe that everyone has the right to participate in gymnastics in a safe and supportive environment, free from any form of abuse, harassment, or non-accidental violence. This right extends to all individuals, regardless of sex, gender identity, sexual orientation, age, marital or civil partnership status, pregnancy or maternity, disability, religion or belief, race, nationality, ethnicity, socio-economic background, or any other characteristic.

We recognise our duty of care to all members, with a particular focus on children and vulnerable adults. The safety and well-being of those involved in gymnastics should be at the centre of everything we do. We are committed to promoting the welfare of all individuals, and we acknowledge the responsibility to create an environment where everyone can thrive, free from harm.

IGA accepts its responsibility to ensure that we, along with our affiliated clubs and organisations, have effective safeguarding arrangements in place. These arrangements are designed to protect children and vulnerable adults from harm and to ensure that any incidents of abuse, neglect, poor practice, or harassment are responded to appropriately. This includes creating clear processes for recognising, reporting, and addressing safeguarding concerns.

All suspected cases of abuse, whether involving children or vulnerable adults, must be reported in line with applicable reporting procedures. Any concerns regarding the safety of a child or adult at risk will be promptly reported to the appropriate authorities, including the police or local children's or adult services, in accordance with local safeguarding arrangements.

Our commitment is to ensure that safeguarding is an ongoing priority within IGA, and we will continue to work together with all our members and partners to protect those in our care.

Definitions

Child/Children

A child is anyone who has not yet reached their 18th birthday. Therefore, the term 'children' refers to both children and young people. Under UK law, all children are entitled to grow up in an environment that is safe, where their well-being and protection from harm are prioritised.

Adult at Risk

An adult at risk is defined under the Care Act 2014 as someone aged 18 or over who:

- Has care and support needs, whether or not the local authority is meeting those needs.
- Is experiencing, or at risk of, abuse or neglect.
- Due to those needs, is unable to protect themselves from abuse or neglect or the risk of it.

An adult at risk may have physical or mental health conditions, disabilities, or other circumstances that make them vulnerable to abuse or exploitation.

Safeguarding

Safeguarding involves protecting individuals from harm and promoting their welfare. For children, safeguarding includes:

- Protecting them from maltreatment.
- Preventing the impairment of their health or development.
- Ensuring that children grow up in environments that provide safe and effective care.
- Taking action to enable all children to have the best outcomes.

For vulnerable adults, safeguarding involves protecting their rights to live free from abuse and neglect, ensuring that people and organisations work together to prevent the risk of abuse and to stop it where it occurs.

Abuse

Abuse is any non-accidental act or failure to act that causes harm. The categories of abuse that apply to children are set out in Working Together to Safeguard Children (2023) and include:

- Physical abuse.
- Emotional abuse.
- Sexual abuse, including sexual exploitation.
- Neglect.
- Extremism.

The Care Act 2014 identifies the following types of abuse that are applicable to adults at risk:

- Physical abuse.
- Domestic violence.
- Sexual abuse.
- Psychological or emotional abuse.
- Financial or material abuse.
- Modern slavery.
- Discriminatory abuse.
- Organisational abuse.
- Neglect and acts of omission.
- Self-neglect, including hoarding.

Bullying

Bullying is intentional behaviour, typically repeated over time, that harms or intimidates another individual or group. It can take various forms, including physical, verbal, and emotional abuse.

Hazing

Hazing refers to activities or behaviours that are designed to initiate new members into a group, often by subjecting them to humiliation or harm. This is commonly seen in social or sports groups, where the desire for acceptance leads to abusive behaviours.

Poor Practice

Poor practice refers to behaviour that falls below the expected standard of conduct, which may not be immediately harmful but sets a bad example. It includes actions that do not meet the required safeguarding standards or fail to protect children and vulnerable adults from harm.

Position of Trust

A position of trust exists when an adult has power or influence over another individual, typically by virtue of their role or authority. For example, a coach, teacher, or volunteer in a sporting or educational setting holds a position of trust. In these relationships, engaging in sexual activity with individuals under the age of 18 is illegal if the adult holds power or influence over them. As of June 2022, the law states that those in a position of trust, such as coaches in sports organisations, cannot legally engage in a sexual relationship with a young person under the age of 18 whom they supervise or mentor.

Extremism

Extremism goes beyond terrorism and involves actions or beliefs that promote division and hatred in society. This can include targeting vulnerable individuals, particularly the young, by promoting ideologies that justify discrimination, the marginalisation of minority groups, or opposition to democratic values. Extremism is defined in the Counter-Extremism Strategy 2015 as the active opposition to core British values, including the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Roles & Responsibilities

The overall responsibility for safeguarding children and vulnerable adults within the Independent Gymnastics Association (IGA) rests with the Board of Directors, with the designated safeguarding lead ensuring the implementation of this policy. The safeguarding lead works closely with all IGA staff, coaches, volunteers, and external partners to ensure that the organisation's safeguarding practices are robust, effective, and in line with UK laws and regulations.

IGA accepts its responsibility to provide leadership and establish effective safeguarding procedures to protect children and vulnerable adults. We are committed to ensuring that safeguarding is prioritised in all IGA activities, and we will:

- Lead the promotion and implementation of safeguarding practices and minimise incidents of abuse, neglect, or exploitation.
- Develop a competent safeguarding workforce by providing ongoing training and resources for staff, volunteers, and coaches to recognise, respond to, and report concerns.
- Establish clear standards of conduct that define appropriate behaviours and boundaries for those in positions of trust, including coaches and volunteers.
- Ensure that all staff, volunteers, and participants are aware of their role in safeguarding and know how to raise concerns safely and without fear of retaliation.
- Implement effective and confidential systems for sharing information with relevant statutory agencies when necessary to protect a child or adult at risk.
- Ensure that all allegations of abuse, neglect, or poor practice are reported to the relevant authorities, including the police, children's or adult services, and handled according to established procedures.
- Support individuals who report safeguarding concerns, as well as those involved in incidents, ensuring that appropriate emotional and practical support is available.

Each IGA-affiliated club or organisation is also responsible for ensuring that their safeguarding practices align with IGA's policy and comply with all legal responsibilities. This includes:

- Designating a senior individual responsible for safeguarding within the club or organisation.
- Appointing a safeguarding officer (or welfare officer) who has a clear remit to promote a safe environment, manage safeguarding concerns, and provide guidance on best practices.
- Promoting the welfare of children and vulnerable adults, ensuring that their voices are heard in decision-making processes, and that their safety is always prioritised.
- Conducting regular risk assessments to identify potential safeguarding concerns and implement measures to mitigate those risks.
- Ensuring that safe recruitment procedures are followed, including enhanced criminal record checks for staff and volunteers in positions of trust.
- Offering regular supervision and safeguarding training to staff and volunteers to ensure they remain competent and confident in recognising and responding to safeguarding concerns.
- Reporting any suspicions or allegations of abuse involving children or adults at risk to the relevant statutory authorities and IGA's safeguarding team.
- Taking action to address poor practice, bullying, or harassment within the club or organisation and ensuring that all individuals know how to report concerns safely.
- Promoting a culture where individuals feel empowered to speak up and raise concerns about safeguarding issues without fear of negative consequences.

Every individual involved in IGA activities also plays a critical role in safeguarding. All members are expected to:

- Recognise the signs of abuse and understand the necessary steps to report concerns to the safeguarding officer or relevant authorities.
- Adhere to IGA's safeguarding policies and standards of conduct, ensuring that they do not engage in, condone, or ignore incidents of abuse or poor practice.
- Report any concerns they have regarding the welfare of a child or vulnerable adult to the relevant authorities, including the police and IGA's safeguarding team.

- Cooperate fully with any investigations and maintain confidentiality where required.
- Failure to comply with the safeguarding policy and procedures will be taken seriously and may result in disciplinary action. All IGA members are expected to take an active role in safeguarding, creating an environment where all participants feel safe and supported.

PART TWO - PROCEDURES FOR REPORTING

Overview

This section outlines the procedures to follow when there is concern that a child or vulnerable adult involved in gymnastics may be at risk of or is experiencing abuse, neglect, or any form of harm. These concerns can arise from a variety of sources and must be addressed promptly and in accordance with the safeguarding laws and regulations in the UK.

Concerns may arise following:

- A disclosure made by a child or vulnerable adult, either directly or indirectly.
- Direct observations or reports of suspicious behaviour, abuse, neglect, or poor practice, including those involving colleagues or other members of the gymnastics community.
- Significant changes in an individual's behaviour, appearance, attitude, or their relationship with others, which may indicate a safeguarding concern.
- Reports from external agencies, such as healthcare professionals, social services, or other organisations, who may bring concerns to light.

Safeguarding concerns can be related to both current situations or non-recent events. They may involve allegations or disclosures of abuse, neglect, or poor practice by an individual within the gymnastics environment or someone external to it.

Safeguarding concerns typically fall into two categories:

- Gymnastics-related concerns: These include allegations about a member or individual in a position of trust within the sport, such as coaches, volunteers, or staff.
- External concerns: These involve allegations that involve individuals outside the gymnastics environment, such as a family member or someone unrelated to the sport, who may be abusing or neglecting a child or vulnerable adult.

It is important to recognise that safeguarding concerns can extend beyond direct incidents within the gymnastics setting. If there are concerns about the welfare of a child or vulnerable adult outside of gymnastics, including issues within their family or community, these should be reported as well. The welfare of children and vulnerable adults should be prioritised in all circumstances, whether the issue arises within the sport or externally.



The process of reporting concerns must be carried out in line with the latest safeguarding regulations and the Children Act 1989 and 2004, the Care Act 2014, and Working Together to Safeguard Children (2023). These laws ensure that the protection of children and vulnerable adults is the central focus of any safeguarding action.

In cases where a concern relates to a failure in safeguarding within an IGA-affiliated club, the issue may also be reported to IGA, which will then follow its Complaints and Disciplinary Policy and Procedure to address the concern appropriately.

Safeguarding Responsibilities

All staff, volunteers, and coaches within the Independent Gymnastics Association (IGA) must be fully aware of their safeguarding responsibilities to ensure that children and vulnerable adults in their care are kept safe. This includes having a clear understanding of when it is appropriate to report concerns and make referrals to the local authority, social services, or the police, in accordance with the latest UK safeguarding laws and regulations, including the Children Act 1989 and 2004, the Care Act 2014, and Working Together to Safeguard Children (2023).

It is crucial to remember that some children and vulnerable adults may not be able to recognise or communicate concerns about abuse or neglect. In these cases, they are more dependent on the adults they interact with to notice signs of potential harm. It is therefore essential that all IGA staff and volunteers are vigilant, observant, and proactive in recognising the possibility that a child or vulnerable adult may be experiencing harm in some area of their life.

The IGA has designated individuals and roles responsible for safeguarding, ensuring that concerns are addressed appropriately and in line with statutory guidelines. These key safeguarding roles include:

- **Designated Safeguarding Lead (DSL):** The IGA's Safeguarding Lead has overall responsibility for safeguarding within the organisation. They ensure that all safeguarding practices are in place, provide guidance on best practices, and respond to complex or serious safeguarding concerns.
- **Safeguarding Officers:** Each IGA-affiliated club, squad, or event will have a designated Safeguarding Officer, typically a Club Welfare Officer (CWO), who acts as the first point of contact for any safeguarding concerns. They will oversee the immediate response to any issues and ensure that they are handled following the appropriate procedures.
- **Safeguarding Team:** IGA's Safeguarding Team is responsible for overseeing the implementation of safeguarding policies across all levels. They provide advice, support, and guidance to staff, volunteers, and organisations when handling concerns and ensure the effective coordination of safeguarding actions.
- **Regional Welfare Officers (RWO):** For concerns that occur at regional events or activities, the RWO is responsible for addressing and managing safeguarding issues. They can also conduct investigations on behalf of the IGA Safeguarding Team and provide support to clubs in safeguarding matters.
- **Squad/Event Welfare Officer:** Although they may not always be present at all times, the Squad/Event Welfare Officer is typically on-call during specific events or activities and is the designated person to contact if any safeguarding concerns arise during such events.

It is the responsibility of all individuals involved with IGA to ensure that any suspicions or allegations of abuse or neglect are reported immediately and appropriately. This includes identifying any signs of abuse or neglect, taking action to protect those at risk, and cooperating fully with investigations. Safeguarding is a collective responsibility, and everyone within IGA is expected to act with diligence and care to protect children and vulnerable adults from harm.

Recognising Signs and Indicators of Abuse

Everyone involved with the Independent Gymnastics Association (IGA) must remain vigilant to the signs and indicators of abuse, neglect, or exploitation. While sometimes an individual may directly disclose a concern, in many cases, the signs of abuse may not be immediately obvious and could take time to emerge. It is essential to be aware of any changes in behaviour, appearance, or interactions that could signal a safeguarding issue, particularly when the individual is unable to articulate their experiences.

Recognising abuse in individuals with disabilities or those who may have learning disabilities, communication difficulties, or behavioural challenges can be particularly difficult. These individuals may not always be able to recognise or communicate that they are being harmed. Therefore, it is essential to be aware of signs of abuse that may manifest as subtle changes in behaviour, routine, or physical condition.

The key indicators of abuse may include:

- **Physical Abuse:** Unexplained injuries, bruises, cuts, burns, or fractures that cannot be explained or are inconsistent with the individual's account of how the injury occurred. The individual may also be fearful of certain individuals or avoid physical contact altogether.
- **Emotional Abuse:** The individual may exhibit signs of anxiety, depression, withdrawal, fearfulness, or a lack of self-esteem. They may become unusually withdrawn or appear constantly anxious about pleasing certain people.
- **Sexual Abuse:** Unexplained difficulty walking or sitting, torn or bloody clothing, or knowledge or language inappropriate for their age. For vulnerable adults, sexual abuse may also involve coercion, manipulation, or exploitation by individuals they depend on for care.
- **Neglect:** Signs of neglect may include poor personal hygiene, malnutrition, untreated medical conditions, or abandonment. The individual may appear listless, underweight, or dirty, or may be left unsupervised or without adequate care.
- **Financial or Material Abuse (especially for vulnerable adults):** This could involve the misuse of an individual's funds, belongings, or property. Indicators may include a sudden inability to pay bills, missing personal items, or significant changes in financial situations.
- **Discriminatory Abuse:** This includes abuse based on factors such as race, gender, disability, age, sexual orientation, or religion. This form of abuse may be harder to spot but can manifest through exclusion, unequal treatment, or verbal abuse.

Accurate and timely recording of any concerns or unexplained changes in behaviour is critical in safeguarding. All staff and volunteers should document and report any concerns or indicators of abuse to ensure that appropriate action can be taken. When documenting concerns, it is essential to record the facts clearly, including what was observed or disclosed, when it occurred, and any responses given, ensuring the information is as precise and objective as possible.

It is the responsibility of every member of the IGA community to report any concern that suggests an individual may be experiencing or at risk of abuse. This includes reporting concerns about others or even witnessing potentially harmful behaviours. If a concern is disclosed to a staff member or volunteer, the responsibility for addressing it lies with the organisation, not just the individual receiving the concern. When a safeguarding concern arises, the person who is made aware of it must report it to the designated welfare officer or safeguarding lead. In some situations, it may be appropriate to seek guidance from a manager or supervisor before making a report, but any concerns regarding immediate risk to an individual must be reported without delay.

It is vital to maintain confidentiality throughout the process. Information about a safeguarding concern should only be shared with individuals who have a legitimate need to know, such as safeguarding officers, statutory authorities, or other relevant parties involved in the investigation or response. This ensures that the privacy and dignity of the individuals involved are respected while safeguarding practices are carried out effectively.

Poor Practice

It is essential that everyone within the Independent Gymnastics Association (IGA) actively challenges poor practice, regardless of the perceived intentions behind an individual's actions. Even where the motives of an individual appear to be well-meaning, failure to challenge poor practice can create an environment where abuse may go unnoticed or be tolerated. This can put children and vulnerable adults at risk, potentially allowing inappropriate behaviours to continue unchecked.

Poor practice refers to behaviour or actions that fall below the expected standards within the gymnastics environment but may not necessarily meet the threshold of abuse. These actions can create a culture where boundaries become blurred, and individuals may be placed in situations where they are vulnerable to harm. Examples of poor practice include, but are not limited to:

- Being alone with a child or vulnerable adult without a valid reason or emergency circumstances.
- Allowing physical contact that may be unnecessary or inappropriate in the context of the activity.
- Making inappropriate comments or jokes that create discomfort or a sense of unease.
- Failing to maintain appropriate boundaries between staff, volunteers, coaches, and participants, which could lead to overly familiar or inappropriate relationships.
- Ignoring or failing to report concerns regarding the welfare or safety of a participant.

While such actions may not always result in harm, they undermine the safety and integrity of the gymnastics environment. Poor practice, if left unchallenged, can escalate into more serious issues and increase the risk of abuse or neglect.

If a situation arises where a coach or individual in a position of responsibility believes that their actions, however well-intended, may have inadvertently caused harm, distress, or discomfort to a child or vulnerable adult, they must immediately report the incident to the designated Welfare Officer. This must be done without unreasonable delay to ensure that the situation is addressed appropriately and swiftly. In certain cases, it may also be appropriate to inform a parent, carer, or guardian to provide additional context and transparency, particularly if the individual involved was hurt, distressed, or felt uncomfortable.

It is especially important that if any situation arises where an individual may have misinterpreted something that was said or done, or where their response to a situation may appear inappropriate (for example, showing sexual arousal in a non-consensual situation), a report must be made. The incident must be documented accurately and promptly to ensure a clear record is available for any necessary follow-up action.

The duty to challenge poor practice is not only a responsibility but also a crucial part of maintaining a safe and supportive environment for everyone in the gymnastics community. All members of IGA must be vigilant, proactive, and committed to reporting any instances of poor practice to ensure the well-being of all children and vulnerable adults involved in gymnastics activities.

Responding to Disclosure

If an individual discloses a concern, whether they are a child or a vulnerable adult, it is essential that they are provided with appropriate support and guidance, while ensuring that their disclosure is handled in a way that does not jeopardise any potential investigations. It is important to remain calm, empathetic, and non-judgmental during this process, allowing the individual to express themselves without feeling pressured.

When an individual discloses that they have been abused, it is essential to follow a clear procedure to ensure the safety of the individual and to comply with the relevant legal requirements. The Children Act 1989 and 2004, the Care Act 2014, and Working Together to Safeguard Children (2023) all provide a framework for how disclosures should be managed to ensure that the safety and well-being of children and vulnerable adults are prioritised. The key steps in responding to a disclosure include:

- **Listen carefully and without interruption:** Allow the individual to speak freely and at their own pace. Do not press for details or ask leading questions, as this may affect the accuracy of any future investigation.
- **Reassure the individual:** It is vital to reassure the individual that they have done the right thing in disclosing their concern and that their safety is the priority. Avoid making promises you cannot keep, especially in regard to confidentiality, as information may need to be shared with relevant authorities.
- **Explain the need to share information:** Clearly explain to the individual that, as part of your safeguarding responsibilities, you must report the concern to the relevant Welfare Officer, safeguarding lead, or manager. This is not only a legal requirement but also ensures that the concern is dealt with by the appropriate authorities, such as social services or the police. It is important to provide reassurance that this is to ensure their safety and well-being.
- **Provide emotional support:** Understand that disclosures can be distressing for individuals, and they may fear potential repercussions. Offer support and validate their feelings. If appropriate, offer to accompany them through the process or refer them to further support, such as counselling or a trusted family member or friend.
- **Record the disclosure accurately:** It is important to record the details of the disclosure immediately after the conversation. This record should include the time, date, and nature of the disclosure, as well as the exact wording used by the individual (where possible). This information is critical for any subsequent investigations or actions. The record should be kept confidential and stored securely.

- **Report the concern promptly:** Once the disclosure has been made, the information must be reported to the appropriate Welfare Officer or safeguarding lead as soon as possible. Delays in reporting could impact the safety of the individual or any potential investigation.

In situations where a disclosure involves a vulnerable adult, it is particularly important to consider their capacity to understand and make decisions about the disclosure. If they lack the mental capacity to make decisions, appropriate steps should be taken to ensure that they are supported, including engaging with family members, carers, or other professionals who can assist in protecting their interests.

Responding appropriately to a disclosure is crucial in safeguarding children and vulnerable adults from further harm. All members of IGA have a responsibility to ensure that disclosures are handled with care, respect, and in line with legal and regulatory requirements, ensuring the safety and well-being of the individual is always prioritised.

Information Sharing

Information sharing between organisations is a critical part of safeguarding children and vulnerable adults. It helps protect individuals, facilitates access to essential support and services, and can be vital in preventing further harm. Effective information sharing ensures that those responsible for an individual's care and well-being are equipped with the necessary information to act promptly and appropriately.

While the primary focus here is on sharing information about abuse or neglect concerns, there may also be situations where sharing information is necessary to promote the welfare or well-being of a child in need or a vulnerable adult at risk. For example, it may be appropriate to share information to ensure that a person receives the necessary support, or to protect others from potential harm. The Children Act 1989 and 2004 and the Care Act 2014 both underline the importance of information sharing when safeguarding children and vulnerable adults.

Safeguarding concerns may need to be shared with various third-party organisations, including:

- **Statutory Authorities:** Such as the police, social services, or child and adult protection services. These organisations are responsible for investigating concerns and providing support to those at risk.
- **Gymnastics Organisations:** Where clubs or affiliated organisations may need to share safeguarding information with IGA, or vice versa, to ensure the safety and protection of all participants.
- **Other Organisations:** Such as other sports organisations or community clubs where risks posed by an individual cannot be managed without the disclosure of relevant information.

There is a legal duty to maintain confidentiality when information is shared in confidence. However, confidentiality is not absolute, and there are situations where information may need to be disclosed without consent, especially when there is a significant safeguarding concern. This could be the case where sharing the information is necessary to protect a child or vulnerable adult or prevent a crime. In these instances, the need to safeguard takes precedence over confidentiality.

The sharing of personal information is governed by the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018, which provide a legal framework for the use of personal data.

These laws ensure that individuals' privacy and human rights are protected, but they also allow for information to be shared when necessary for safeguarding purposes. It is important that any decision to share information is based on a clear justification and considers the potential impact on the individual's privacy versus the risk to their safety if the information is not shared.

If the information is to be shared without the individual's consent, the reasons for doing so must be carefully considered. It is best practice to be open and honest with the individual about why their information is being shared, with whom it will be shared, and to seek their agreement where it is appropriate and safe to do so. However, when there are serious safeguarding concerns, it may not always be possible or necessary to obtain consent before sharing the information.

In the context of safeguarding children, the Children Act 1989 and 2004 make it clear that the welfare of the child is paramount. This means that the needs of children who may be at risk must always be the central consideration when deciding whether to share information.

When sharing information, all decisions should be made on a case-by-case basis. Those making decisions about sharing information are responsible for ensuring that the justification for doing so is clear and that the process complies with data protection laws. All decisions should be documented, and the information shared should be appropriate to the safeguarding concerns at hand.

If there is uncertainty about whether to share information, advice can be sought from IGA's Safeguarding Team or from statutory authorities such as the police or local authority. In situations where a safeguarding concern is external to gymnastics, the identity of the individual can be withheld in the first instance to protect their privacy while still seeking guidance.

Appendices within the IGA Safeguarding Policy provide further detailed guidance on the circumstances when it is lawful to share personal information for safeguarding and welfare purposes, helping to ensure that all decisions are made in compliance with the law and best safeguarding practices.

Reporting Concerns

It is not the role of IGA staff, volunteers, or members to investigate suspected abuse or neglect, whether it involves a child or a vulnerable adult. However, it is our responsibility to report any concerns and share relevant information with the appropriate statutory authorities when necessary, in line with safeguarding laws and regulations. This ensures that the proper investigations can take place and that individuals at risk receive the protection and support they need.

If an individual is at immediate risk of significant harm, a referral should be made without delay to the relevant authorities, such as the Local Authority Social Services or the police, who are responsible for investigating suspected criminal offences. It is crucial that any action taken prioritises the immediate safety and well-being of the individual at risk.

It is not the role of IGA staff, volunteers, or members to investigate suspected abuse or neglect, whether it involves a child or a vulnerable adult. However, it is our responsibility to report any concerns and share relevant information with the appropriate statutory authorities when necessary, in line with safeguarding laws and regulations. This ensures that the proper investigations can take place and that individuals at risk receive the protection and support they need.

If an individual is at immediate risk of significant harm, a referral should be made without delay to the relevant authorities, such as the Local Authority Social Services or the police, who are responsible for investigating suspected criminal offences. It is crucial that any action taken prioritises the immediate safety and well-being of the individual at risk.

The decision to report a concern should not be delayed by attempts to gather more information or to contact the designated Welfare Officer. If an urgent referral is made by telephone, it should be followed up with a detailed incident report within 48 hours, ensuring that all relevant information is provided. When making a referral, it is important to ensure that the name and contact details of the person to whom the referral was made are provided to IGA or the relevant safeguarding authority, along with the details of the concern. This information must be submitted without delay to ensure appropriate action can be taken swiftly.

If there is any uncertainty about whether a referral is appropriate, guidance can be sought from the NSPCC 24-hour helpline or the relevant local authority's children's or adult social care team. These organisations can offer advice on whether a safeguarding concern should be escalated or whether further steps are needed.

There are specific considerations when reporting concerns that relate to either a child or a vulnerable adult, particularly when the individual in question falls within the statutory definition of an adult at risk. The procedures for reporting these concerns are outlined in detail within the relevant sections of this policy.

If an allegation is made against any IGA member, employee, official, or anyone covered under the scope of this policy, it must be reported to IGA or the appropriate Home Country Welfare Officer. This ensures that the concern is addressed in accordance with safeguarding protocols and in alignment with the appropriate legal and organisational requirements.

This policy includes separate guidelines for reporting concerns related to:

- Children: The procedures for reporting concerns about children are outlined in Part 1 of this document.
- Adults at Risk: The reporting guidelines for concerns about adults who may be at risk are detailed in Part 2.

By following these reporting procedures, IGA ensures that all concerns are addressed appropriately, that individuals are safeguarded, and that the necessary steps are taken to protect children and vulnerable adults within the gymnastics community.

Whistleblowing

Whistleblowing refers to the reporting of concerns or complaints about the conduct of an individual, made by someone other than the affected person. While incidents of abuse or neglect can be reported directly by the individual concerned, whistleblowing is often used when someone witnesses misconduct or feels that an action needs to be raised, even when they are not directly impacted.

At the Independent Gymnastics Association (IGA), we recognise that some individuals may feel fearful or reluctant to report concerns, especially when the perpetrator is in a position of power or authority. This can include situations where a coach, volunteer, or staff member may be responsible for the misconduct. To address this, we are committed to ensuring that whistleblowers can report their concerns safely. Where possible, we will maintain confidentiality and protect the identity of the whistleblower to prevent any negative repercussions for them.

Whistleblowing may also be relevant in situations where an individual has raised a safeguarding concern directly with a registered club or organisation, but the club has either failed to act appropriately or has taken action that is considered unsafe or inadequate. In such cases, it is vital that the whistleblower can escalate their concern to IGA or another appropriate authority, ensuring that the matter is addressed appropriately.

IGA is committed to ensuring that anyone who reports a safeguarding concern in good faith is not subject to retaliation or any form of adverse consequence. This protection extends to anyone, including participants, parents, volunteers, and staff, who raises concerns about the safety and well-being of children or vulnerable adults. These protections ensure that individuals can speak up about serious concerns without fear of losing their job, position, or facing any form of discrimination or retribution. However, it is important to note that these protections do not extend to individuals who make complaints that are intentionally false, malicious, vexatious, or frivolous. Whistleblowing should always be done in good faith, with the intention of protecting vulnerable individuals and upholding safeguarding practices. Whistleblowers are encouraged to report their concerns to the designated safeguarding officer, welfare officer, or directly to IGA. By fostering a culture where individuals can safely report concerns, we ensure that safeguarding remains a priority, and that any risks to children or vulnerable adults are promptly addressed.

Responding to an Incident

Safeguarding incidents can occur within any gymnastics environment, whether during training sessions, competitions, or other related activities. If an abusive situation arises, immediate action is required to ensure the safety of the individual at risk. The individuals involved in the incident should be approached immediately, and where possible, this should be done by two adults, one of whom should ideally be the Welfare Officer, if they are on-site. This ensures that the incident is managed appropriately and that the individual at risk is not left alone during the response.

If the incident is ongoing and the safety of the individual is still at risk, the person(s) involved must be instructed to stop the behaviour immediately. The priority in any situation like this is to ensure that anyone at risk is protected and made safe. The Welfare Officer or another responsible adult should remain with the individual at risk until their needs have been fully addressed, providing them with reassurance and support during the process.

In situations where the incident cannot be controlled or the behaviour escalates, it is crucial to contact the police immediately to address any immediate risk and ensure the safety of everyone involved. If medical treatment is required for anyone affected by the incident, this should be sought without delay. It is important to inform medical professionals that the incident may be related to a safeguarding concern so that appropriate care and documentation can be provided.

If the concern involves serious poor practice rather than abuse, and there is no immediate risk to the individual, a different approach may be necessary. In such cases, the Welfare Officer may not need to be involved right away, but it is important to inform the individual about the situation in a way that respects their privacy and does not undermine their position or dignity. Consideration should also be given to informing other relevant parties, such as parents or carers, where

For incidents that occur during international events, particularly where individuals from other National Federations are involved, IGA will report the matter to the relevant National and/or International Federation in line with local laws and statutory reporting procedures. This ensures that the incident is handled appropriately according to the jurisdiction and safeguarding guidelines of the country or organisation involved.

Serious allegations of sexual abuse may be made some time after the event, particularly in cases where the victim was a child or vulnerable adult at the time of the abuse. All such cases will be treated as if the complaint is recent to ensure that the individual receives the necessary support and protection. These allegations will be taken seriously, regardless of when they are disclosed, and investigated thoroughly.

IGA will advise the individual making the disclosure of their right to make a formal complaint to the police. If the concern involves an individual who is still actively involved in the sport, IGA's safeguarding team will assess whether it is appropriate to share the information with the relevant statutory authorities, based on whether there is a current risk to individuals in the sport.

If it is decided that the information should be shared with the statutory authorities, the individual who made the disclosure will be informed of the reasons for sharing this information. This transparency ensures that the individual understands the importance of the referral and the next steps in the process. IGA will make the referral or, where appropriate, assist the individual in reporting the matter to the authorities and provide information about relevant support services available to them.

Prompt, appropriate responses to incidents and allegations are essential in safeguarding individuals and ensuring that the gymnastics environment remains safe for all participants.

Investigation

When a concern or complaint of abuse or poor practice is made, it is important that the situation is investigated thoroughly and appropriately. There are several types of investigation that may be carried out, depending on the nature and severity of the concern. These investigations are guided by UK laws and safeguarding regulations to ensure that individuals are protected and the process is fair and transparent.

- **Criminal Investigation:** If the concern involves criminal behaviour, such as physical or sexual abuse, the police will conduct a criminal investigation. The police are responsible for gathering evidence, interviewing witnesses, and taking appropriate action to determine whether a criminal offence has occurred.
- **Child Protection Investigation:** If the concern involves a child, the investigation will be conducted by social care services under Section 47 of the Children Act 1989. This section mandates that local authorities investigate cases where they have reason to believe a child is at risk of significant harm. Social care services will assess the situation, gather information, and work with other relevant agencies to protect the child.
- **Adult Protection Investigation:** If the concern involves a vulnerable adult, the investigation will be carried out by adult social care services under Section 42 of the Care Act 2014. This section requires local authorities to investigate where there is suspected abuse or neglect of an adult who is at risk. This could involve vulnerable adults who may have care and support needs, such as those with disabilities or mental health conditions.
- **Multi-Agency Investigation:** In some cases, a multi-agency process may be convened to address the concern. This may involve a range of professionals, including social workers, the police, healthcare professionals, and safeguarding officers. The Designated Officer (LADO) arrangements may be invoked to coordinate the investigation, ensuring a collaborative approach to safeguarding.
- **Internal Investigation by IGA:** In addition to external investigations, IGA may conduct its own internal enquiry, particularly where the concern relates to a member of the gymnastics community, such as a coach, volunteer, or staff member. This internal investigation will be in line with IGA's Complaints and Disciplinary Policy. The Safeguarding Team will lead any necessary enquiries, which may occur in parallel with or in support of other investigations. IGA's internal investigation will focus on whether any IGA policies or safeguarding protocols were violated and determine appropriate actions based on the findings.

All investigations must be carried out in a way that protects the rights of the individual involved while ensuring the safety and well-being of those at risk. It is important that the investigation process is transparent, fair, and respectful, while also ensuring that confidentiality is maintained where necessary. The outcome of the investigation will determine whether further action is required, including referral to statutory authorities, disciplinary action within IGA, or other protective measures.

In cases involving vulnerable adults, particular consideration must be given to their capacity to understand and engage in the investigation process. If the individual lacks capacity, appropriate measures must be taken to support them throughout the investigation, including involving family members, carers, or other relevant professionals.

The safeguarding of children and vulnerable adults is of paramount importance, and all investigations must be conducted in accordance with current UK safeguarding laws and best practices to ensure that individuals are protected and justice is served.

Interim Measures

During the course of any investigation, and to ensure the safety and protection of all parties involved, IGA may implement interim measures. These measures may include the temporary suspension of membership or participation in IGA activities while the investigation is ongoing. The decision to impose such measures will be made in consultation with the Designated Officer, ensuring that the protection of both the individual under investigation and others involved is prioritised.

Where appropriate, these interim measures will be aligned with IGA's Complaints and Disciplinary Policy, ensuring that they are fair, proportionate, and consistent with safeguarding best practices. The primary aim of any interim action is to safeguard individuals and maintain a safe environment throughout the investigation process, while also ensuring due process is followed.

Criminal Convictions

Where a participant, whether a child, vulnerable adult, or any individual involved with IGA, is convicted of a criminal offence related to abuse or neglect, this conviction may be sufficient to conclude that abuse or harassment has occurred. In such cases, further internal investigation may not be necessary, as the legal proceedings and conviction will have addressed the matter.

Upon the conviction of an individual for a criminal offence that relates to safeguarding concerns, the matter will be immediately referred to IGA's Integrity Unit. The Integrity Unit will then take any further action required, including determining if any disciplinary measures are necessary in accordance with IGA's Complaints and Disciplinary Policy. These actions are in line with the UK legal frameworks, including the Children Act 1989 and 2004, the Care Act 2014, and other relevant legislation, which ensure the protection of children and vulnerable adults involved in gymnastics activities.

It is important to note that IGA has a zero-tolerance approach to any form of abuse or neglect, and the outcome of criminal proceedings will guide any subsequent actions within the organisation. This approach ensures that individuals who pose a risk to others, particularly children and vulnerable adults, are appropriately managed, with their continued involvement in the sport being reassessed in light of the conviction.

The safety and well-being of all participants remain IGA's highest priority, and any individual convicted of a relevant criminal offence will be subject to further scrutiny to ensure that any ongoing risk is effectively addressed.

Retention of Records

Any information related to safeguarding concerns must be stored securely, in compliance with data protection laws, including the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Safeguarding records should be retained for as long as necessary to protect the individual involved and ensure that appropriate action is taken.

For children, records of safeguarding concerns should generally be kept until the child reaches the age of twenty-five. This is in line with UK guidelines for the retention of safeguarding records to ensure that there is an appropriate history of safeguarding issues, particularly if the individual requires ongoing support or intervention.

In the case of vulnerable adults, records should be kept for as long as the individual is at risk or as required by relevant statutory guidance. This is essential to ensure that there is a clear record of any concerns, actions taken, and any subsequent support or referrals made.

IGA will retain information about significant safeguarding concerns, particularly where members are in a position of trust, for a minimum of 10 years. This ensures that safeguarding issues are properly documented, allowing for future reviews if necessary, and providing a clear history of any incidents that may impact the safety and welfare of others in the gymnastics community.

All records must be stored securely and access should be restricted to authorised personnel who have a legitimate need to know. When records are no longer needed, they should be securely destroyed to prevent unauthorised access. Retaining safeguarding records for the appropriate period is essential to ensure compliance with legal obligations and best practices, and to ensure that the IGA can continue to safeguard children, vulnerable adults, and all participants effectively.

Procedures - Section 1: Procedures- Reporting concerns about a child or children

Anyone who has concerns about a child's welfare, including staff, volunteers, or IGA members, can make a referral to the relevant Local Authority Children's Social Care team in the area where the child lives or report the concerns to the designated welfare officer within the organisation.

If it is believed that a child is suffering, or is likely to suffer, significant harm, the referral should be made immediately to the Local Authority Children's Social Care and/or the police. These agencies are responsible for investigating and addressing concerns related to child protection.

If the child is at immediate risk, urgent action must be taken by contacting the police via 999. For out-of-hours concerns, both the Police and Children's Social Care Services provide an out-of-hours service to respond to urgent safeguarding situations.

Local Authorities have a Designated Officer (previously known as the Local Authority Designated Officer or LADO), or a team of officers, who are responsible for managing and overseeing allegations against individuals who work with children. This includes situations where the individual has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved in a way that suggests they may pose a risk of harm to children.

The Designated Officer is responsible for managing cases from the initial phase of the allegation through to its conclusion. They are available to discuss concerns and provide advice on whether a referral should be made and whether immediate management action is necessary to protect the child.

Local authorities also provide advice and guidance to employers and organisations about how to handle allegations against people who work with children, ensuring that proper steps are taken to protect the child and the integrity of the investigation.

Any safeguarding concerns about a child reported to the designated welfare officer should be reviewed and, where necessary, discussed with senior managers. This will help determine whether information should be shared with statutory authorities, IGA, or other relevant organisations, in line with legal and best practice guidelines.

The welfare officer must inform the IGA Safeguarding Team or the relevant Home Country Safeguarding Manager immediately if an allegation or concern is made against an individual who is a IGA member or affiliate. This ensures that the appropriate actions are taken and that the safeguarding concern is managed effectively.

When a referral is made to Children's Social Care, they have a legal duty to make enquiries where a child is believed to be at risk of significant harm. These enquiries may involve speaking to people who know the child, including family members, and may be carried out in conjunction with the police if a criminal offence is suspected.

Anyone who has made a referral should always follow up on their concerns if they are not satisfied with the response. Safeguarding must be treated as a priority, and ensuring that the response is appropriate and timely is essential to protecting the child.

These procedures ensure that all concerns regarding the welfare of children are addressed promptly, in line with current safeguarding laws, and that children's safety is prioritised at all times.

Procedures - Section 2: Procedures - Reporting concerns about adults at risk

Under the Care Act 2014, Local Authorities are required to make enquiries or ensure that enquiries take place when they reasonably suspect that an adult at risk has been abused, neglected, or is at risk of harm. This is to ensure that the individual receives the necessary protection and support.

Anyone who has concerns about an adult at risk has the right to refer those concerns to the relevant Local Authority Adult Social Care department, based on where the adult resides, or to report the concerns to the designated welfare officer within IGA.

One key difference between safeguarding children and safeguarding adults is that adults, including those who are considered at risk, retain the right to independence, choice, and self-determination. This means they should have the ability to decide whether any information about them is shared. However, in cases where the person is unable to make decisions due to mental incapacity, the responsibility falls on others to act in the best interests of the individual.

When a concern is reported to a Welfare Officer, consideration should be given to whether the adult at risk has the mental capacity to understand the concerns and whether they are able to consent to the sharing of this information. If the adult at risk has capacity, it is important to respect their wishes, but if they do not consent to the referral, there may still be circumstances where information must be shared to ensure their safety.

In cases where the adult at risk lacks mental capacity, careful consideration must be given before making a referral to Adult Social Care. The decision should be based on whether the individual can understand the nature of the concerns and make an informed decision.

If the adult at risk has the capacity to make decisions but refuses to give consent for the concern to be reported to Adult Social Care, their wishes should be considered. However, there are specific circumstances where it may be necessary to share information without consent. These circumstances are outlined in the information-sharing section of this policy and include cases where there is a significant risk to the individual or others, where a serious crime has been or may be committed, or where the person involved has care and support needs.

If it is determined that the information should be shared, the adult at risk must be informed of the decision and made aware of who will receive the information, unless disclosing this information would increase the risk of harm. The adult's decision to withhold consent should be documented, along with the reasons for sharing the information.

In cases involving adults without capacity, safeguarding concerns should always be shared with the relevant statutory authorities. However, when the adult at risk has the mental capacity to make the decision, it is their right to decide what information is disclosed to their family, carers, or other support networks. No information should be shared without the individual's consent, except in cases where it is necessary to protect their safety or the safety of others.

When the adult at risk does not have the capacity to make the decision, it may not always be appropriate to share information with their family or carers. The relationship between the adult at risk and the alleged abuser must be carefully considered, particularly when the abuser is a family member or someone closely associated with the individual. In such cases, advice should be sought from Adult Social Care to determine the most appropriate course of action.

These procedures ensure that the rights of vulnerable adults are respected, while also prioritising their safety and well-being. All concerns must be taken seriously, and appropriate action must be taken to protect adults at risk from harm, in line with the relevant UK safeguarding laws and regulations.

Appendix 1 - Categories of abuse defined in working together to safeguard children

The categories of abuse outlined below are defined in the statutory guidance *Working Together to Safeguard Children* (2023). While these definitions specifically address children, they are also relevant when identifying and addressing concerns related to vulnerable adults under the Care Act 2014, which recognises similar forms of harm. Safeguarding measures must be adapted to address the specific needs of both children and adults at risk.

Physical Abuse

Physical abuse involves causing physical harm to a child or vulnerable adult. It may include actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise intentionally causing physical injury. Fabricating or inducing illness by a parent, carer, or another individual responsible for the care of a child or adult is also a form of physical abuse. For adults, this may also include rough handling, inappropriate restraint, or misuse of medication.

Emotional Abuse

Emotional abuse involves the persistent maltreatment of an individual in a way that impacts their emotional well-being or development. This may include making a child or adult feel worthless, unloved, or inadequate, silencing them, or mocking their communication. It can involve age-inappropriate expectations, overprotection, preventing normal social interaction, or exposing them to the mistreatment of others (such as domestic violence). Bullying, including cyberbullying, and coercive control are also forms of emotional abuse. All forms of abuse involve some level of emotional harm, though emotional abuse may occur independently.

Sexual Abuse

Sexual abuse includes forcing or enticing an individual to engage in sexual activities. For children, this may occur with or without their understanding of what is happening and can involve physical contact such as rape, assault by penetration, or non-penetrative acts like touching, kissing, or masturbation. Non-contact abuse includes exposing a child to sexual imagery, grooming, or exploitation via technology. For vulnerable adults, sexual abuse also includes coerced sexual activities, inappropriate touching, or sexual exploitation that takes advantage of a power imbalance, including financial dependency. Child Sexual Exploitation (CSE) is a form of sexual abuse where a child is manipulated or coerced into sexual activity in exchange for something they want or need or for the benefit of the abuser. This often involves grooming and may include the use of technology.

Neglect

Neglect is the persistent failure to meet basic physical, emotional, or psychological needs, leading to harm or impairment of development. For children, neglect may begin in utero due to substance misuse by the mother and, after birth, may involve failing to provide adequate food, shelter, clothing, supervision, or medical care.

For vulnerable adults, neglect can include failing to provide essential care, leaving the individual in unsafe situations, or not addressing their basic emotional needs. Self-neglect is also recognised in adults, where an individual fails to care for their own health, hygiene, or living conditions, often due to mental health issues or other factors impairing their ability to function.

Appendix 2 - Categories of abuse and neglect as defined by the Care and Support Statutory Guidance

The following categories of abuse and neglect are outlined in the Care and Support Statutory Guidance under the Care Act 2014. These definitions provide a framework for identifying and addressing safeguarding concerns involving vulnerable adults. Many of these forms of abuse overlap with those applicable to children, but they are specifically tailored to reflect the circumstances and rights of adults at risk.

Physical Abuse

Physical abuse includes actions such as assault, hitting, slapping, pushing, misuse of medication, inappropriate restraint, or the application of physical sanctions that are unjustified or harmful.

Domestic Violence

Domestic violence involves a range of abusive behaviours, including psychological, physical, sexual, financial, or emotional abuse. It may also include so-called "honour-based" violence, which is used to control or punish perceived breaches of cultural or familial expectations.

Sexual Abuse

Sexual abuse includes a variety of behaviours, such as rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing, subjection to pornography or witnessing sexual acts, and sexual assault. It also includes sexual activities to which the adult has not consented or has been pressured into consenting.

Psychological/Emotional Abuse

This form of abuse involves actions that cause emotional harm, such as threats of harm or abandonment, humiliation, controlling behaviour, coercion, intimidation, harassment, verbal abuse, isolation, cyberbullying, or the unreasonable withdrawal of necessary services or supportive networks.

Financial or Material Abuse

Financial or material abuse includes theft, fraud, internet scamming, or coercion related to an adult's financial affairs or arrangements. It can involve misuse or misappropriation of property, possessions, benefits, or funds, including manipulation concerning wills, inheritances, or financial transactions.

Modern Slavery

Modern slavery encompasses slavery, human trafficking, forced labour, and domestic servitude. Perpetrators may use coercion, deception, or violence to force individuals into situations of abuse, servitude, and inhumane treatment.

Discriminatory Abuse, Including Hate Crimes

This includes harassment, slurs, or mistreatment based on an individual's race, gender, gender identity, age, disability, sexual orientation, religion, or other protected characteristics.

Organisational Abuse

Organisational abuse refers to neglect or poor care practices within an institutional setting, such as a hospital, care home, or in-home care services. It can range from one-off incidents to ongoing ill-treatment and may stem from systemic failings, such as poor policies, processes, or staff training.

Neglect and Acts of Omission

Neglect occurs when an individual's basic needs are ignored. This can include failing to provide access to medical, emotional, or physical care, withholding necessities like medication, food, or heating, or failing to support the individual's health and well-being.

Appendix 3 - Poor Practice

Poor practice refers to behaviours or actions that, while not meeting the threshold of abuse or neglect, are nonetheless unacceptable and could create an environment where harm is more likely to occur. Poor practice can range from breaches of safeguarding policies to behaviours that, if repeated, could escalate into abuse. It is essential to identify and address poor practice to maintain a safe and supportive environment for all participants, particularly children and vulnerable adults.

Examples of Poor Practice

Poor practice can include actions that are emotionally harmful, fail to meet safeguarding standards, or breach recognised coaching practices. Examples include:

- Behaviour on the Fringe of Emotional Abuse:
 - Name-calling, including sarcastic or racist remarks.
 - Excessive monitoring of weight.
 - Persistent criticism or undermining.
 - Exerting excessive pressure to perform.
 - Forcing participation against a person's will.
 - Use of inappropriate language or harassment.
 - Ostracising or ignoring individuals.

Inadequate Safeguarding Practices:

- Operating without a designated Welfare Officer.
- Failing to implement adequate safeguarding arrangements.
- Providing insufficient supervision or care.
- Not responding appropriately to concerns or allegations.
- Penalising individuals who raise safeguarding concerns, such as expelling them from the club.
- Excluding parents or carers from observing training sessions or asking questions.
- Misusing photographic equipment, including unauthorised live streaming.

Neglect in a Sports Context

Neglect in a sports setting might occur if a coach or staff member fails to ensure participant safety or exposes them to harmful conditions. Examples include:

- Ignoring the physical safety of participants, such as training in overly cold conditions.
- Failing to prevent risky behaviours that could result in injury.

Breaches of Recognised Coaching Practices

Poor practice related to coaching can include:

- Conducting sessions without another responsible adult present.
- Exceeding personal qualifications or competency levels.
- Using training methods inappropriate for the individual's developmental stage.
- Imposing excessive training or competition demands.
- Employing improper or excessive physical support or stretching techniques.

Practices That Pose Significant Risks

Certain practices are recognised as significant risk factors for abuse. Examples include:

- Taking a child or vulnerable adult to a secluded place unaccompanied.
- Engaging in rough, physical, or sexually provocative games.
- Sharing a room with a child or vulnerable adult.
- Allowing or engaging in inappropriate touching or making sexually suggestive remarks.
- Using humiliation, bullying, or verbal abuse as a form of control.
- Allowing inappropriate language or behaviour to go unchallenged.
- Ignoring or failing to act on allegations made by participants.
- Performing personal care for a child or vulnerable adult that they can manage independently.
- Leaving premises without ensuring the safe dispersal of participants.
- Abusing a position of trust or power.
- Reducing self-esteem through embarrassment or humiliation.
- Spending excessive time alone with children or vulnerable adults.
- Engaging in personal electronic communication or having inappropriate relationships on social media with participants.
- Sending inappropriate messages to children or vulnerable adults.

Addressing Poor Practice

Poor practices must be addressed immediately to prevent harm and maintain a safe environment. Any actions that raise concerns should be reported to the Welfare Officer or Safeguarding Lead. For advice or guidance, the Independent Gymnastics Association (IGA) Safeguarding Team should be contacted.

Risk Assessments

In situations where risk factors exist, such as during events, competitions, or visits, a thorough risk assessment must be completed. The risk assessment should:

- Identify potential risks.
- Outline measures to prevent, reduce, or minimise risks.
- Assign responsibility for managing these risks.

Poor practice has the potential to compromise the safety and well-being of participants. By identifying, reporting, and addressing such behaviour, the IGA aims to foster a culture of respect, safety, and accountability in all its activities.

Appendix 4 - Key Indicators of Abuse

Recognising the indicators of abuse is a critical part of safeguarding children and vulnerable adults. The following guidance, adapted from the NSPCC, highlights behaviours and signs that may indicate abuse or neglect across different age groups. It is essential to remain vigilant, as these indicators could apply to a wide range of individuals and situations. Safeguarding concerns must always be taken seriously, and any suspicions should be reported following the appropriate procedures.

All Ages

- Talks about being left home alone or in the care of strangers.
- Displays a poor bond or relationship with a parent or caregiver, also referred to as insecure attachment.
- Acts out excessive violence or aggression towards others.
- Lacks social skills, struggles to form friendships, or is socially isolated.

Children Under Five

- Does not cry or respond to the presence or absence of a parent or caregiver at an early age.
- Fails to reach developmental milestones, such as learning to speak, without any medical explanation.
- Is significantly underweight despite having a healthy appetite and eating well when provided with food.

Children Aged Five to Eleven

- Becomes secretive or reluctant to share information about their life or experiences.
- Expresses a reluctance to go home after school or appears anxious about returning home.
- Is unable or unwilling to bring friends home and is reluctant to allow professionals into the family home.
- Has poor school attendance or punctuality, or is often picked up late from school.
- Shows a lack of interest in school activities or receives minimal support from parents regarding school performance or behaviour.
- Displays reluctance to change clothes for sports or other activities.
- Experiences bedwetting or soiling incidents.

Children and Young People Aged Eleven to Sixteen

- Drinks alcohol regularly or at an unusually early age.
- Expresses concern for younger siblings without providing a clear explanation.
- Becomes increasingly secretive or reluctant to share personal information.
- Talks about running away or leaving home.
- Exhibits challenging or disruptive behaviour at school.
- Shows hesitation or discomfort about changing clothes for sports or other activities.

Additional Context for Vulnerable Adults

For vulnerable adults, key indicators of abuse may include:

- Sudden or unexplained changes in behaviour or mood, such as withdrawal or agitation.
- Unexplained injuries, bruises, or burns.
- Evidence of neglect, such as poor personal hygiene or malnutrition.
- Fearfulness or reluctance to engage with caregivers or authority figures.
- Financial irregularities, such as missing funds or unpaid bills.
- Isolation or being prevented from seeing friends, family, or support networks.

Taking Action

These indicators are not exhaustive, and the presence of one or more signs does not necessarily mean that abuse has occurred. However, they may warrant further investigation or referral to safeguarding professionals.

Further detailed information can be accessed on the NSPCC website or by consulting statutory safeguarding guidance, including *Working Together to Safeguard Children (2023)* and the *Care Act 2014*. It is essential that all members of the Independent Gymnastics Association remain alert to these indicators and act promptly to report any concerns.

Appendix 5 - Recording Concerns

When reporting safeguarding concerns, it is essential that any information shared with Children's Social Care Services, the Police, or the Independent Gymnastics Association (IGA) is as accurate and detailed as possible. Comprehensive records help ensure that safeguarding professionals can respond effectively and appropriately to the concerns raised.

Detailed records should include:

- The full name, role, and contact details of the person receiving the disclosure or recording the information.
- Details of the child or adult at risk, including full name, date of birth, address, and any relevant personal information.
- Information about the parent or carer, along with a note on what, if any, information has been shared with them.
- Full details of the individual against whom the concern or allegation is made, including their name, date of birth, address, relationship to the person concerned, and their position within the club or organisation, if applicable.
- The date, time, and place of the incident(s), along with any other relevant contextual details.
- A description of the nature of the concern or allegation, including specific details where possible.
- A description of any visible injuries or bruising, if relevant, including the child or adult's account of how the injuries occurred.
- Details of any online or social media involvement, including devices, applications, formats used, and whether photographs or messages are involved.
- A clear distinction between factual information, hearsay, and opinion to ensure the record remains objective.

Reporting the matter to the Police or Children's Social Care Services must not be delayed while gathering additional information. Referrals made by telephone should be followed up with a detailed written report, such as an incident form, within 48 hours to provide a comprehensive account of the concern.

The Welfare Officer must also record the following details:

- The name, role, and contact information of the professional to whom the referral was made (e.g., social worker, police officer).
- The department, rank, and reference number associated with the case, where applicable.
- The date and time of the referral.

A copy of the completed incident report form should also be sent to the IGA Safeguarding Team. This ensures that the organisation is informed and can take any further necessary action in accordance with safeguarding policies and procedures.

Accurate and timely recording of concerns is crucial to ensuring that safeguarding measures are implemented effectively and that the safety and well-being of children and vulnerable adults remain the top priority.

Appendix 6 - Responding to a Disclosure

When a disclosure is made by a child or an adult at risk, it is vital to handle the situation with care, empathy, and professionalism. Following the appropriate procedures ensures that the individual feels supported and that the disclosure is handled in line with UK safeguarding laws and best practices, including the Children Act 1989 and 2004 and the Care Act 2014. The following guidance outlines how to respond to a disclosure while prioritising the safety and well-being of the individual.

From a Child

If a child indicates that they are being abused, or if information is received suggesting a concern, the person receiving the disclosure should:

- Stay calm and ensure the child is safe and feels safe.
- Listen carefully and actively to what the child says without interrupting.
- Reassure the child that they have done the right thing by disclosing the information.
- Explain that the information may need to be shared with others to ensure their safety—do not promise to keep secrets.
- Allow the child to speak at their own pace without pressuring them for more information.
- Keep questions to a minimum, ensuring they are open-ended and non-leading to clarify the child's account.
- Let the child know that what they have said is being taken seriously and that appropriate steps will be taken.
- Tell the child what will happen next and with whom the information will be shared.
- Record what was said using the child's exact words as soon as possible, including key details such as:
 - Place, date, and time of disclosure.
 - Place, date, and time of incidents, if known.
 - Names mentioned by the child.
 - To whom the information was given.
 - Clear distinctions between fact, hearsay, and opinion.

The record must be signed, dated, and promptly shared with the relevant statutory agency and the IGA Safeguarding Team. If the child expresses a desire for confidentiality, explain carefully and tactfully why it is necessary to inform the appropriate authorities, such as Children's Social Care. Similar considerations should apply when discussing whether to inform the child's parent(s) or guardian, provided they are not the subject of the disclosure.

From an Adult at Risk

Additional considerations apply when responding to a disclosure from an adult at risk. The person receiving the disclosure should:

- Establish what the adult at risk wants to do and whether they wish to report the matter.
- Determine who they want to be informed and whether there are specific individuals they do not want to know about the disclosure.
- Respect their autonomy and choices while explaining the circumstances under which information may need to be shared without their consent, particularly if others are at risk or a crime has been committed.
- Provide reassurance and explain the next steps in a clear and supportive manner.

Appendix 7 - Information Sharing to Protect or Promote the Welfare of Children and Adults at Risk

Effective information sharing is essential in safeguarding children and adults at risk. This guidance aims to assist individuals and organisations in making informed decisions about when and how personal information can be shared lawfully, in line with UK legislation, including the General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant safeguarding frameworks such as Working Together to Safeguard Children 2023 and the Care Act 2014.

Data protection laws are not barriers to sharing information where it is necessary to protect individuals from harm. In fact, sharing information can often help promote better outcomes, for example, by ensuring access to appropriate services or by addressing safeguarding concerns effectively.

Key Principles of Information Sharing

Information sharing must always comply with data protection legislation. However, when safeguarding children or adults at risk, there are clear provisions under the law that permit sharing information with appropriate authorities, even without consent, where it is necessary to prevent harm or ensure safety.

Definitions

- Personal Data/Information: Any information relating to an identified or identifiable individual, such as names, addresses, or contact details.
- Special Category Data: Personal data requiring greater protection, such as health information, race, religion, or sexual orientation.
- Processing: Any operation performed on personal data, including collecting, storing, sharing, or deleting information.
- Third Party: An individual or organisation that is not the data subject, controller, or processor.

Lawful Bases for Sharing Information

Under Article 6 of the UK GDPR, information sharing is lawful if one or more of the following apply:

- The individual has given consent.
- Sharing is necessary to comply with a legal obligation.
- Sharing is necessary to protect vital interests, such as preventing harm.
- Sharing is necessary for tasks in the public interest.
- Sharing is necessary for legitimate interests pursued by the data controller or a third party, where this does not override the rights of the data subject.

Safeguarding Considerations for Children

When sharing information about a child at risk, the welfare of the child is paramount under the Children Act 1989. If the child is at risk of significant harm, there is a legal obligation to share information with appropriate authorities, such as the police or Children's Social Care.

Safeguarding Considerations for Adults

Adults have a right to independence, choice, and self-determination, including control over their personal information. However, there are situations where it is appropriate to share information without consent, such as:

- The individual lacks the mental capacity to make an informed decision.
- The individual is under coercion or undue influence.
- Others, including children, may be at risk if the information is not shared.
- A serious crime has been committed or may be prevented by sharing information.
- A statutory authority or court order requires the information to be shared.

Special Category Data

Sharing special category data (e.g., health or religious beliefs) is permitted where there is substantial public interest, such as safeguarding children or adults at risk. Consent is not required if seeking it would place the individual or others at greater risk.

The Seven Golden Rules of Information Sharing

The HM Government Information Sharing Advice for Practitioners (2018) provides clear guidance:

- Be open and honest with individuals about why and how information will be shared, unless it is unsafe to do so.
- Seek advice if unsure about sharing information without disclosing the individual's identity where possible.
- Share information with consent where appropriate, but do not let a lack of consent prevent sharing where there is a lawful basis.
- Base decisions on the safety and well-being of the individual or others.
- Ensure shared information is necessary, proportionate, relevant, accurate, timely, and secure.
- Keep a record of decisions made, whether to share or not, including the reasons and details of what was shared.

Best Practices for Safeguarding Information Sharing

- Clearly document the rationale for sharing or withholding information, ensuring compliance with safeguarding and data protection laws.
- Limit sharing to those with a legitimate need to know and ensure information is accurate and securely shared.
- Avoid tipping off alleged perpetrators when sharing information that may affect an investigation.

By adhering to these principles, the IGA ensures that safeguarding concerns are addressed appropriately while respecting individuals' rights under UK law. Information sharing must always prioritise the safety and well-being of children and vulnerable adults.

Appendix 8 - Consent and mental capacity

This guidance is designed to help individuals understand when it is lawful to obtain consent for a course of action or to share personal information, particularly in the context of safeguarding children and vulnerable adults. Consent must always be informed, freely given, and made by someone with the capacity to understand and agree to the decision without coercion.

Understanding Consent

For consent to be valid, the individual must:

- Have the mental capacity to make an informed decision.
- Understand the nature and implications of the decision.
- Provide consent without coercion or undue influence.

Consent for Children and Young People

Children under 16 can give consent if they are deemed to have the intelligence, competence, and understanding to make an informed decision. This is known as Gillick competence.

Young people aged 16 and over are presumed to have the capacity to consent unless there is evidence to the contrary. However, if a young person aged 16 or 17 is unable to provide consent due to a lack of capacity, a person with parental responsibility can provide consent on their behalf.

Children and young people should be involved in decision-making wherever possible, regardless of age, as this respects their autonomy and promotes their understanding of the situation.

Consent for Adults

Adults are presumed to have the capacity to make decisions unless proven otherwise. This includes the ability to decide whether their personal information is shared. Adults at risk may require additional consideration to determine whether they have the capacity to consent, particularly in cases involving:

- Impaired mental or physical health.
- Conditions such as dementia, learning disabilities, or brain injuries.
- Temporary factors like intoxication or confusion.

The Mental Capacity Act 2005

The Mental Capacity Act 2005 provides a framework for assessing and supporting individuals who may lack capacity. The Act is based on five key principles:

- A person must be assumed to have capacity unless proven otherwise.
- A person should not be considered unable to make a decision unless all practicable steps to help them have been taken without success.
- A person should not be considered incapable merely because they make an unwise decision.
- Any action taken on behalf of a person who lacks capacity must be in their best interests.
- The least restrictive option must always be considered when taking action or making a decision.

Capacity must always be assessed on a case-by-case basis, as an individual may lack capacity to make certain decisions but not others.

Determining Mental Capacity

An individual may lack capacity if they cannot:

- Understand the information relevant to the decision.
- Retain the information long enough to make a decision.
- Use or weigh the information as part of the decision-making process.
- Communicate their decision in any way, including through speech, sign language, or other means.

Assessing Capacity and Consent

To assess whether someone is competent to give valid consent:

- Ensure they understand the question being asked.
- Confirm they have a reasonable understanding of:
 - What information might be shared.
 - The reasons for sharing information.
 - The potential implications of sharing or not sharing information.
- Verify they can:
 - Consider the options available.
 - Weigh the pros and cons of their decision.
 - Express their opinion without undue influence.
 - Maintain consistency in their decision-making.

If a person lacks capacity, any decision made on their behalf must be done in their best interests, following the principles of the Mental Capacity Act 2005.

When Consent Is Not Required

In safeguarding contexts, there are circumstances where it is lawful to share information without consent, such as:

- The individual lacks the capacity to consent.
- The individual is at risk of significant harm.
- Sharing information is necessary to prevent a crime or protect others.
- A statutory authority has requested the information.

Further Guidance

The Mental Capacity Act 2005 Code of Practice provides detailed guidance on assessing capacity and making decisions for individuals who lack capacity. Those working regularly with vulnerable adults should be familiar with the Code of Practice and confident in making appropriate decisions about consent and information sharing.

By adhering to these guidelines, IGA ensures that consent and capacity are handled with respect and care, in line with current UK laws and safeguarding principles.

Helpful Documents and Information

Important Contacts

NSPCC

Our voice Helpline is currently available 11am–6pm Monday to Friday. You can still email help@NSPCC.org.uk or complete our report abuse online form at any time for free. If you think a child is in immediate danger, please call the police on 999 straight away.

<https://www.nspcc.org.uk>

Childline

You can talk to us about anything. No problem is too big or too small. Call us on 0800 1111 or chat to us online. Childline is open 24 hours a day, 7 days a week.

<https://www.childline.org.uk>

Helpful Documents:

Our website is home to a comprehensive collection of safeguarding documents that are available for download. Whether you need to access our safeguarding policy, reporting forms, training materials, or guidelines on safe practices, these documents are easily accessible. They are essential resources designed to provide clear guidance and support to our members, ensuring that safeguarding measures are understood and followed consistently throughout IGA.