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Safeguarding Adults at Risk in Rowing

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Glossary:

Abuse	See section 2.4.
Adults at Risk	<p>Those people of or over 18 years of age who have health or social care needs (irrespective of whether or not those needs are being met by social services) and who are unable to safeguard themselves as a result.</p> <p>While we recognise that some people will be vulnerable due to their learning disability or mental health needs there are also those adults who are at risk due to a specific circumstance they may find themselves in, for example; domestic abuse, forced marriage, and sexual or commercial exploitation (this is not an exhaustive list).</p> <p>In sport this may look like, but is not limited to:</p> <ul style="list-style-type: none">• an elite athlete being sent threatening and sexually explicit text messages from their coach;• a member of a learning disabled sports club being exploited by another club member who regularly takes money from them at lunch;• a young woman confiding in her coach about a forthcoming holiday where she believes she will be married against her will;• a club insisting on a parental consent form before taking a 20 year old participant with a mild learning disability on a day trip;• a coach who regularly neglects the individual needs of disabled participants when training; or• a group of people with mild dementia who train together.
Advocate	An individual who speaks on behalf of, or represents the interests of, an adult where appropriate.
Carer	A generic term which includes parents, carers and guardians.
Child(ren)	Anyone under the age of 18.
Child Protection in Sport Unit	The CPSU team is sited within the National Society for the Prevention of Cruelty to Children (NSPCC) and was established with joint funding from Sport England.
Club Welfare Officer (CWO)	The designated individual within a British Rowing affiliated club whose responsibilities are explained in WG3.10

Disclosure and Barring Service (DBS) On 1 December 2012 the Criminal Records Bureau and Independent Safeguarding Authority merged to become the DBS under *The Protection of Freedoms Act 2012*. The DBS carries out Criminal Records Checks and administrates the Barred Lists on behalf of the Home Office for 'Registered Bodies' in England and Wales. In Scotland the equivalent body is known as 'Disclosure Scotland' and in Northern Ireland as 'Access Northern Ireland'. When an organisation removes a person from Regulated Activity with Adults at Risk because of safeguarding concerns, they must make a referral to the DBS.

Duty of Care The duty that rests upon an individual or organisation to ensure that all reasonable steps are taken to ensure the safety of any person involved in an activity for which that individual or organisation is responsible (WG 3.1).

Equalities Act 2010 The Equality Act 2010 is the law that bans unfair treatment and helps achieve equal opportunities in the workplace and in wider society. The act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations.

The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment.

Lead Safeguarding Officer (LSO) The designated person in British Rowing whose responsibilities are explained in Section 5.3.

Local Multi-Agency Safeguarding Adults Committee These Adult protection committees have responsibility for the co ordination of work undertaken by agencies involved both in providing services and safeguarding Adults. They provide local inter-agency guidelines detailing procedures for cases of actual or suspected abuse. Some areas have established sports sub-groups to inform their work. There are similar structures for children called Local Safeguarding Children's Boards (LSCBs).

No Secrets 2000 This document gives guidance to local agencies that have a responsibility to investigate and take action when a vulnerable adult is believed to be suffering abuse. It offers a structure and content for the development of local inter-agency policies, procedures and joint protocols that will draw on good practice nationally and locally.

Personnel	Employees of British Rowing and its affiliated clubs or facilities used in rowing, as well as volunteers and all participants in the sport of rowing.
Position of Trust	This is where an individual, such as a coach, teacher, or club officer who makes decisions for or about an Adult at Risk, can influence the individual's actions and may misuse that position to groom or abuse the Adult at Risk. This position can be a positive one, in building confidence and self-esteem.
Registered Body	An organisation that is able to act as recipient of DBS information on behalf of its members.
Regulated Activity with Adults	<p>The government has introduced a new definition of Regulated Activity with Adults. In the past the definition of Regulated Activity with Vulnerable Adults (or Adults at Risk) focused on the location of the activity. The new definition focuses much more on the type of activity and contact an individual may have with an Adult at Risk. It does not stipulate a frequency requirement like the definition of Regulated Activity with Children. For Adults at Risk the activity alone means an individual is in Regulated Activity – there is no frequency requirement – once is enough.</p> <p>The types of activity that fall into Regulated Activity with Adults at Risk are clearly set out and in the large part there are no activities that apply for sport and recreation organisations. This means that for the majority of sport and recreation organisations there will be no legal requirements in terms of safeguarding Adults at Risk because there are no individuals deemed to be in Regulated Activity. However, best practice dictates that sport and recreation organisations should be conducting Criminal Records Checks (even if they are not entitled to Barred List checks) on all individuals who have an opportunity to build up a relationship of trust with Adults at Risk and this is consistent with British Rowing's current Safeguarding and Protecting Children Policy.</p> <p>An individual is only defined as being in Regulated Activity with Adults at Risk if one of the following conditions is met:</p> <ol style="list-style-type: none"> I. Providing Healthcare (health care by a healthcare professional – only first aid if it is administered by an individual on behalf of an organisation whose purpose is to provide first aid). There is potential under this activity for sports physiotherapists to be classed as in regulated activity – however this is unlikely. As soon as sector specific guidance is available we will let you know.

2. Providing Personal Care (physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of the adult's age, illness or disability).
3. Providing social work.
4. Assistance with general household matters (managing the person's cash, paying the person's bills, or shopping on their behalf).
5. Assistance in the conduct of a person's own affairs (power of attorney).
6. Conveying (any form of transport).

It is important to note that personal relationships are exempt from Regulated Activity in relation to Adults at Risk.

Regulated Activity Provider	The person or organisation responsible for employing or deploying workers to facilitate a Regulated Activity, whether these workers are paid or unpaid. See WG 2.9.
Risk Assessment	A procedure to help identify possible sources of danger and take appropriate action to minimise these risks taking into account the age, number and competence of participants. See British Rowing's <i>RowSafe</i> guide for examples.
Rower	Generic term to include every rower, sweep-oar or sculler, cox or indoor rower.
Safeguarding Case Officer	Individual within British Rowing whose responsibilities are explained in WG3.10
Safeguarding Vulnerable Groups Act 2006	The Safeguarding Vulnerable Groups Act established the legal basis for the Independent Safeguarding Authority who managed the two lists of people barred from working with children and/or vulnerable adults (Adults at Risk) replacing the barred lists (List 99[2], the Protection of Children Act 1999 (PoCA)[3], the scheme relating to the Protection of Vulnerable Adults (PoVA)[4] and Disqualification Orders[5][6].
Significant Access	Being in a position to have regular and direct contact with Children or Adults at Risk whether as a volunteer or employee (see 'Position of Trust').

WG	Welfare Guidance documents, detailed in Section 10, and available to download from the British Rowing website www.britishrowing.org/welfare
Vulnerable Adults List	A list of people who have been identified and are banned from working in a care position with adults. This list is held and maintained by the DBS. There is a statutory duty that requires care providers to check the list to determine if a candidate is on it.

I. Safeguarding and Protecting Adults at Risk Policy

I.1 General principles

Everyone who participates in rowing is entitled to do so in a safe and enjoyable environment. All British Rowing clubs, competitions and associated individuals must follow the policies defined in this document.

British Rowing is committed to helping everyone in rowing accept their responsibility to safeguard Adults at Risk from harm and abuse.

This document sets out the procedures you need to follow to safeguard and protect Adults at Risk and what you need to do if you have any concerns.

I.2 Scope

These policies apply to all Rowers, Carers, coaches, volunteers, employees and anyone involved in rowing, whether or not they are British Rowing members. All these people have a duty of care to safeguard the welfare of Adults at Risk and prevent their abuse.

I.3 Why these policies are needed

British Rowing has realised the need for an individual policy for Adults at Risk, in line with the considerations of the *Disability Discrimination Act 2005* and *The Equality Act 2010*, to promote equal opportunities and provide a clearer framework for those who suffer from physical, mental health and learning disabilities.

At Risk people are at heightened risk of abuse and discrimination because of their susceptibility and many experience this in all walks of life. Practice has shown that At Risk people who are victims of abuse in the sports setting can be reluctant to report their experiences for fear of losing a positive and important part of their lives. Therefore it is essential that British Rowing, as a national governing body, and its associated clubs and personnel, are aware of the indicators of abuse and can recognise and act appropriately to protect potential victims.

Abuse can occur in many situations, including the home, workplace, day centre, at the shops, on the bus, in educational institutions and of course in the rowing club.

For the majority of Adults at Risk, rowing will be a positive and rewarding experience. However, there is a growing recognition that sport generally provides easy access to At Risk people for those who wish to perpetrate abusive behaviour for their own gratification. Therefore, British Rowing is aware of the need to protect Adults at Risk from those individuals who may seek to harm them in the rowing environment. Although this document mirrors the *British Rowing Safeguarding and*

Protecting Children Policy for practical reasons, there are fundamental differences between the policies.

The primary difference in addressing adult and child abuse relates to the adult's right to self-determination. Adults may choose not to act at all to protect themselves and only in extreme circumstances will the law intervene. This is not the case for children because they are minors under the *Children Act 1980* and this legislation can be used quickly and effectively to ensure protection from abuse once it has been recognised.

In cases of suspected adult abuse it is important to recognise that assertive persuasion to encourage the individual to report or take action against an abuser or abusive situation may have negative outcomes for that adult and could be detrimental to their wellbeing by causing them further harm. Therefore, the protection of Adults at Risk from abuse is a more complex process than child protection and requires policy and procedures that reflect this. Policy users need to develop an understanding that protecting Adults at Risk necessitates a more supportive and advisory approach in response to reporting abuse, than in child protection situations where the legal framework is clear and definitive and requires stipulated responses. In serious situations the child can be removed from the abusive environment, for Adults at Risk it is not always possible or appropriate to achieve this level of safety.

Each Adult at Risk is a unique individual with varying degrees of need and ability. Some people will have a combination of physical and learning disability, others may have one or the other; some may have mental health needs and a combination of other complex disabilities such as Epilepsy, Diabetes, Down Syndrome, visual or hearing impairment.

The appropriateness of involving carers in any rowing and welfare related decision making will depend on the individual needs and circumstances of the Adult at Risk and, most of all, upon their wishes. Often Adults at Risk feel strongly that they want to maintain independence and make decisions for themselves; such views should be encouraged and supported wherever possible. Ideally, good practice suggests a partnership model of working involving the British Rowing coach, teacher or club officer, the Adult at Risk and their carer. In these circumstances it is important that the Adult at Risk is at the centre of the decision making process.

The provisions in the *Mental Capacity Act 2005* should be considered in relation to Adults at Risk and decision-making. Those without the capacity to make decisions under this legislation will be more dependent on their carer or responsible adult in the decision making process. The act provides that:

“For the purposes of section 2, a person is unable to make a decision for himself if he is unable—

- (a) to understand the information relevant to the decision,*
- (b) to retain that information,*
- (c) to use or weigh that information as part of the process of making the decision, or*
- (d) to communicate his decision (whether by talking, using sign language or any other means).*

(2) A person is not to be regarded as unable to understand the information relevant to a decision if he is able to understand an explanation of it given to him in a way that is appropriate to his circumstances (using simple language, visual aids or any other means).

(3) The fact that a person is able to retain the information relevant to a decision for a short period only does not prevent him from being regarded as able to make the decision.

(4) The information relevant to a decision includes information about the reasonably foreseeable consequences of—

- (a) deciding one way or another, or*
- (b) failing to make the decision.”*

British Rowing encourages the individual's development of independence, confidence and self-esteem on a personal level and in their rowing activities. Hence it is important that everyone in rowing is aware of the need to balance the involvement of carers and the needs and wishes of individual rowers in cases where Adults at Risk are concerned.

The following policy document draws from and includes relevant legislation and government guidance such as the *Safeguarding Vulnerable Groups Act 2006* and the *No Secrets* guidance (2000) regarding vulnerable people.

1.4 Policy statement

British Rowing is committed to:

- Making the welfare of Adults at Risk paramount, even where the rights and needs of the other adults that work with them are overridden in order to provide the necessary protection to these individuals,
- Enabling everyone, whatever their age, culture, disability, gender, first language, racial origin, religious belief and/or sexual identity, to participate equitably in rowing in a fun and safe environment,
- Taking all reasonable steps to protect Adults at Risk from harm, discrimination and degrading treatment and have respect for their human rights, wishes and feelings.
- Taking all suspicions and allegations of abuse or poor practice seriously and responding swiftly and appropriately to them in accordance with current procedures (found in the accompanying procedural documents),
- Ensuring that all British Rowing employees working with Adults at Risk are competent and appropriate for the responsibility and have been provided with relevant awareness training regarding the potential difficulties Adults at Risk can face and how to manage them,
- Requiring all affiliated member clubs, competitions and regional councils to accept responsibility for the welfare of the Adults at Risk in their care in accordance with all the British Rowing policies and procedures, and that they incorporate these into their constitutions and rules,
- Being mindful and ensuring all member clubs, competitions and regional councils are mindful of the differences between policies and procedures regarding Adults at Risk and those of children, and particularly that each Adult at Risk has the right to self determination in all but the most extreme matters.
- Where appropriate, working in partnership with parents and carers to support the Adult at Risk and, where practicable, cooperating with their wishes to achieve the best outcomes for the Adult at Risk.

2. Good practice, poor practice and abuse

2.1 Introduction

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental.

It is not the responsibility of any individual involved in rowing to make judgements regarding whether or not abuse is taking place, however, **all** British Rowing personnel have the responsibility to recognise and identify poor practice and potential abuse, and act on this if they have concerns as explained in section 3.

2.2 Good practice

British Rowing strongly advises, that coaches of Adult at Risk rowers:

- are registered British Rowing members
- fully accept Sports Coach UK and British Rowing Coaches Codes of Conduct

- are British Rowing qualified
- have completed a course in basic awareness in working with Adults at Risk

Everyone should:

- conduct appropriate risk assessments before carrying out any activity
- aim to make the experience of rowing fun and enjoyable
- promote fairness and playing by the rules
- not tolerate the use of prohibited or illegal substances
- treat all Adults at Risk equally and preserve their dignity; this includes giving attention, time and respect to all rowers regardless of their level of ability

Coaches and those working with Adults at Risk should:

- respect the developmental stage of each Rower and not risk sacrificing their welfare in order to gain club personal achievements
- ensure that the training intensity is appropriate to the physical, social and emotional stage of the development of the Rower
- work with Adults at Risk and their Carers (where appropriate) to develop realistic training and competition schedules which are suited to the needs and lifestyle of the Rower, not the ambitions of others such as coaches, team members, parents, carers or the club
- build relationships based on mutual trust and respect, encouraging Adults at Risk to take responsibility for their own development and decision-making
- always be publicly open when working with Adults at Risk, for example:
 - Avoid coaching sessions or meetings where a coach and an individual Rower are completely unobserved.
 - maintain an appropriate and open environment with no secrets
 - avoid unnecessary physical contact with Adults at Risk
- maintain a safe and appropriate relationship with Rowers and avoid forming intimate relationships with Rowers you are working with as this may threaten the position of trust and respect present between athlete and coach
- be an excellent role model by maintaining appropriate standards of behaviour
- gain the Adult at Risk's consent and, where appropriate, the consent of relevant carers, in writing, to administer emergency first aid or other medical treatment if the need arises
- be aware of medical conditions, disabilities, existing injuries and medicines being taken and keep written records of any injury or accident that occurs, together with details of treatments provided
- arrange that someone with current knowledge of emergency first aid is available at all times
- gain written consent from the correct people and fill out relevant checklists and information forms for travel arrangements and trips.

Physical contact may be appropriate where:

- it is neither intrusive or disturbing
- the Rower has provided permission openly
- it is delivered in an open environment

2.3 Poor practice

The following is regarded as being poor practice and should be avoided as far as is reasonable:

- unnecessarily spending excessive amounts of time alone with an individual Adult at Risk away from others
- engaging in rough, physical or sexually provocative games, including horseplay
- allowing or engaging in inappropriate touching of any form
- using language that might be regarded as inappropriate by the Adult at Risk, especially comments regarding disability which may be hurtful or disrespectful
- making sexually suggestive comments, even in fun
- reducing an Adult at Risk to tears as a form of control

- letting allegations made by an Adult at Risk go unchallenged, unrecorded or not acted upon
- doing things of a personal nature that an Adult at Risk can do for themselves
- taking an Adult at Risk alone on a car journey, however short inviting or taking Adults at Risk to your home or office where they will be alone with you
- sharing a room with an Adult at Risk

Note: at times it may be impractical to avoid some of these particular examples of poor practice. In this case, to protect both the Adult at Risk and yourself, seek written consent from the Adult at Risk and, where appropriate, their Carer and ensure that the CWO of your club/organisation is aware of the situation and gives their approval.

If, during your care, you accidentally injure an Adult at Risk, they seem distressed in any manner, appear to be sexually aroused by your actions, or misunderstand/misinterpret something you have done, report these incidents as soon as possible to another adult in the organisation and make a brief written note of it. It may also be in the best interests of the adult to discuss the matter with them openly and in a professional and sensitive manner that will avoid embarrassment; this is dependent on the individual Rower and the circumstances.

2.4 Abuse

Abuse has many forms and can affect an Adult at Risk of any age or disability. The effects of such treatment can be degrading and damaging in the longer term and may follow an individual throughout their lives.

An individual who has been abused may exhibit a wide range of uncharacteristic behaviours some of which may manifest in the following ways:

- find it difficult or impossible to maintain a stable or trusting relationship
- become involved with drugs or prostitution
- increase alcohol consumption
- show angry or volatile behaviour without reason
- attempt suicide or self-harm
- go on to abuse another individual

Some of the reasons why Adults at Risk may be at increased risk of abuse are as follows:

- stereotyping
- prejudice
- discrimination including ethnic or racial, sexual, disability orientated, etc.
- isolation low self image and low self esteem resulting in vulnerable self presentation
- lack of knowledge about appropriate behaviours by others
- desire for acceptance , affection and attention
- powerlessness to protect themselves
- dependency upon others to care for them
- difficulty in communicating that abuse has occurred

2.4.1 Indicators of abuse

Even for those experienced in working with the abuse of Adults at Risk, it is not always possible to recognise potential abusive situations or situations where abuse is ongoing. Personnel involved in the work of British Rowing do **not** have responsibility for assessing and deciding situations where abuse may be occurring. It is however the responsibility of everyone in rowing to be alert to the indicators of abuse and to act upon any concerns in line with British Rowing policy and procedures relating to the protection of Adults at Risk.

Indicators of abuse may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which an explanation seems inconsistent and improbable
- a disclosure made by an at Risk individual describing what appears to be an abusive act involving him/her
- an expression of concern from a third party about the welfare of an individual unexplained changes in an individual's behaviour, such as loss of confidence, low self-esteem,
- becoming quiet and withdrawn, sudden outbursts of temper or uncharacteristic changes in behaviour, tearful, depressed, angry, watchful and frightened
- engaging in sexually explicit behaviour
- distrust of others, particularly those with whom a close relationship would normally be expected
- difficulty in making friends and socialising contrary to previous social behaviour
- being prevented from socialising with other individuals by a carer or person in a position of authority
- displaying variations in eating patterns including overeating, loss of appetite or stealing and concealing food
- unexplained weight loss deterioration in personal hygiene and physical appearance
- refusal/reluctance to undress or change for sporting activities

2.4.2 Degree of abuse

In response to the *No Secrets* Government guidance, the Law Commission states that the severity and extent of abuse should be evaluated based on the level of harm brought about by ill treatment (not only physical ill treatment) *“that leads to an impairment of, or avoidable deterioration in physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development”*. In assessing the degree of abuse, consideration should be paid to:

- the vulnerability of the victim
- the nature and extent of the abuse
- the length of time the abuse has been occurring
- the impact on the individual
- the risk of repeated or increasingly serious acts involving this or other Adults at Risk.

2.4.3 Types of abuse

The Government guidance *No Secrets* provides the following as classifications of abuse:

2.4.3.1 Neglect and acts of omission

“Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of necessities of life, such as medication, adequate nutrition and heating.”

In a rowing situation this could include:

- a coach not keeping an Adult at Risk safe by exposing them to undue cold, heat or the unnecessary risk of injury e.g. allowing Rowers under their supervision to train or race inappropriately clothed for the prevailing conditions
- a parent, guardian or carer consistently leaving an Adult at Risk without adequate provisions e.g. food, water, clothing, sun block where they are unable to provide themselves with these provisions

2.4.3.2 Physical abuse

“may involve hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.”

In a rowing situation this could include:

- a coach disregarding the individual requirements of each Adult at Risk’s needs when setting a training programme e.g. allowing those who are limited by a physical impairment to undertake inappropriately long, continuous ergo training that causes harm.

2.4.3.3 Sexual abuse

“Including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent, or was pressured into consenting.

In a rowing situation indicators could include:

- a coach engaging in unnecessary and inappropriate physical contact e.g. massaging the shoulders of the rowers in a suggestive manner
- a coach making suggestive comments to their Rowers, an individual spending an unnecessary amount of time in the changing area where Adults at Risk are changing.

2.4.3.4 Psychological abuse

“Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.”

In a rowing situation this could include:

- a Carer or coach subjecting a Rower to constant criticism, shouting, name-calling, sarcasm, bullying or discriminatory behaviours or prejudicial attitudes
- a Carer or coach putting a Rower under unrealistic pressure in order to perform to high expectations

2.4.3.5 Financial or material abuse

“Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.”

In a rowing situation this could include:

- blackmailing a Rower by requiring financial or material payment in return for certain benefits such as rowing awards or complements
- charging Adults at Risk more than the standard fee for participation in rowing activities

2.4.4 Bullying

“Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves”

Bullying can be:

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

2.4.4.1 Anti-Bullying Policy

British Rowing is committed to fostering a caring, friendly and safe environment for everyone involved in rowing so they can participate in a relaxed and secure atmosphere. Bullying of any kind is unacceptable in rowing. If bullying does occur, all Rowers, coaches, volunteers or carers should be able to tell and know that incidents will be dealt with promptly and effectively.

Bullies come from all walks of life; they bully for a variety of reasons and may even have been bullied or abused themselves. Typically bullies can have low self-esteem, be excitable, aggressive or jealous.

Bullies can be boys or girls, men or women. Although bullying often takes place in schools and care homes, research shows it can and does occur anywhere where there is inadequate supervision—on the way to and from college, university or the sports club, at a sporting event or in the changing rooms.

Competitive sports such as rowing are an ideal environment for the bully.

The bully in rowing can be a:

- Carer who pushes too hard
- coach who adopts a “win at all costs” philosophy
- Rower or cox who intimidates or ridicules a peer
- club official who places unfair pressure on a person
- spectator who constantly shouts abuse

See the *Model Anti-Bullying Policy for Rowing Clubs (WG 1.1)* and Flow chart for responding to allegations of bullying involving Adults at Risk (WG 1.15).

2.4.4.2 Why is it Important to Respond to Bullying?

Bullying results in pain and distress to the victim. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Rowers who are bullying need to learn different ways of behaving.

Everyone involved in rowing has a responsibility to respond promptly and effectively to issues of bullying.

2.4.4.3 Signs and Symptoms

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to all individuals, particularly vulnerable groups. An individual may indicate, by signs or behaviour, that he or she is being bullied. Coaches and those in staffing positions should be aware of these possible signs that they should investigate, especially where an individual:

- says they are being bullied
- is unwilling to go to club sessions
- becomes withdrawn, anxious, or lacking in confidence
- regularly feels ill before training sessions
- has clothes torn or possessions damaged
- has possessions go "missing"
- asks for money,
- steals money or parts with their own money (to pay bully)
- has unexplained cuts, bruises or injuries
- is frightened to say what is wrong
- gives improbable excuses for any of the above

In more extreme cases:

- starts stammering cries themselves to sleep at night,
- has nightmares or demonstrates any other form of unusual behaviour during the evenings
- becomes aggressive,
- disruptive or unreasonable
- is bullying other individuals
- stops eating
- self harms
- attempts or threatens suicide or runs away

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

3. Responding to suspicions and allegations of abuse

3.1 Introduction

Although most cases of abuse take place within the family setting, abuse can and does occur in rowing.

It essential that all allegations are taken seriously and appropriate action is taken. It is not your responsibility to decide if abuse of an Adult at Risk is taking place. It is your responsibility to report your concerns to the appropriate agencies (see below). Not acting is not an option

3.2 Receiving evidence of possible abuse

You may have concerns about abuse and /or poor practice because:

- you see it happening
- you recognise signs such as those listed in section 2.4.1
- someone reports it to you an Adult at Risk approaches you directly

**Advice on what to do if an Adult at Risk says or indicates that they are being abused, or you have concerns about their welfare is available in WG 2.15.*

3.3 Recording information: confidentiality and information sharing

All concerns that you may have or receive should be recorded, ideally using the British Rowing form, Recording Concerns of Abuse (WG 1.2).

You are recording this information for:

- yourself, so you have a record of what happened
- the CWO or other designated welfare person within your club, who will co-ordinate any action that needs to be taken
- the British Rowing LSO so that he can advise you
- the Police/Social Care Services if appropriate

It is not appropriate to share sensitive and confidential information with other people, e.g.

- your club committee
- other members of your club
- other acquaintances outside rowing

When recording information you should:

- Stick to the facts – what you have seen, heard or had reported to you
- Distinguish between what is your personal knowledge and what you have been told by others
- Do not give your own opinions: be clear when you are giving your own or others' interpretation of events and reason for this (for example if a comment was in response to a question or an unsolicited remark)

British Rowing has adopted an Information Sharing Protocol developed by the CPSU. This comprehensive document illustrates clearly, in words and diagrams, how decisions to share information are made within British Rowing and between British Rowing and other bodies. The document is available as WG 5.2 on the website www.britishrowing.org. The key principles of this protocol will be used to make information sharing decisions in cases involving Adults at Risk.

3.4 Reporting the concern

The discovery that someone you know may be abusing an Adult at Risk will raise feelings and concerns at your club. Although it can be difficult to report such matters, you must remember that:

- the welfare of the Adult at Risk is paramount
 - being vigilant helps to protect the individual.
-
- Do not undertake to keep any disclosure of abuse confidential. It is important to explain to the Adult at Risk BEFORE a disclosure that you may have to discuss the information they give with a person in a more responsible position than yourself
 - Always ensure you have the permission of the individual and/or their Carer (where appropriate) before taking official action regarding the concern. It is important that the individual is able to exercise their right to self-determination unless in exceptional circumstances, the level of abuse is very serious and clearly necessitates criminal investigation.
 - Do not pressurise the Adult at Risk as this can contribute to their stress. Try to negotiate an amicable agreement with the individual about sharing your concerns and be honest about who must be told and what may then happen. Ensure the Adult at Risk feels in control of their information and seek to encourage the individual to report the abuse themselves.
 - A good reporting structure ensures that concerns are dealt with fairly.

British Rowing's Whistleblowing Policy (WG 1.3) assures all members, staff, and volunteers that it will fully support and protect anyone who, in good faith, reports a concern that a colleague is or may be abusing an Adult at Risk.

3.4.1 Involving Carers

British Rowing is committed to working in partnership with parents and/or Carers where appropriate. In most situations, it is important that the CWO or LSO involve Carers to clarify any initial concerns e.g. if an Adult at Risk seems withdrawn, it may be that they have experienced a recent bereavement. Consulting Carers must be considered in light of the Adult at Risk's right to confidentiality and the *Mental Capacity Act 2005* and ideally should be undertaken with the full consent of the Adult at Risk. Where there is doubt as to the Adult at Risk's mental capacity to make decisions then advice must be sought from the LSO.

Where it is considered that a Carer may be the perpetrator of (responsible for) the abuse or is

colluding with it, or may not be able to respond to the situation appropriately they should not be involved, as it may place the Adult at Risk at greater risk.

3.4.2 Involving British Rowing

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

- what further action should be taken by the club or British Rowing
- whether the Adult at Risk should consider taking further action or advice
- whether further action, advice or investigation is needed by/from the Police or Social Care Services.

Passing on this information is important because the matter may be just one of a series of other instances which together cause concern. It enables the Case Management Group (Section 6.3) and Safeguarding Vulnerable Groups Panel (Section 10) to analyse trends and improve existing British Rowing policy and guidance.

Adult at Risk referral letters should be clearly marked **private and confidential** and sent to the LSO at: British Rowing, 6 Lower Mall, London, W6 9DJ.

Alternatively, the LSO can be contacted through the national office on: **0208 237 6700**.

3.4.3 Involving Statutory Agencies

It should be noted that physical and sexual abuse is illegal. Consequently there is an obligation that allegations and concerns are reported to the police who will decide whether to take criminal action or not. In some instances, other types of abuse such as discrimination and financial exploitation may also be considered to be criminal and these should also be reported.

In any case of physical or sexual abuse or where an Adult at Risk's safety is at risk, the Adult At Risk must be encouraged to contact one of the following statutory agencies:

- their local police station or in an emergency, dial 999. The police should be involved if the abuse is thought to be of a criminal nature. A record should be made of the details of the referral and the crime reference number
- Adult Social Care Services (formerly Social Services). This body has a statutory duty to ensure the welfare of adults in at Risk positions and are legally bound to investigate allegations of abuse. Such investigations will involve discussing the matter with the vulnerable adult, and where appropriate their carers. They will also gather information from others who know and are involved with the vulnerable person

In an emergency, Social Care services contact details can be found on your area's County Council website or from the Samaritans (08457 909090) who will hold the Duty Officer's contact number.

All telephone referrals made to the statutory agencies must be confirmed in writing within 24 hours detailing the following information:

- the name and title of the member of staff to whom the concerns were passed and the date this happened
- any action that has been taken
- a summary of the information shared and the response received
- the time and date of the referral call to the statutory agency

Other services that can offer help and advice:

- Careline. Telephone counselling service for children, young people and adults on any issue, including relationships, depression, mental health, abuse, addictions, stress etc.

www.carelineuk.org T **0845 1 228622**

- Disability Information Service. National service providing information on all aspects of disability for disabled people, their families, friends and carers. www.diss.org.uk
- Mencap. Charity working with people with a learning disability and their families and carers. www.mencap.org.uk T **0808 808 1111**
- Mental Health Foundation. Information about how to get help with any mental health problem in your local area. www.mentalhealth.org.uk
- Mind. A wealth of information about mental health issues and contact details for the nearest Mind group in your area. www.mind.org.uk T **0845 766 0163**
- Ann Craft Trust. Offer advice on issues relating to children and adults with learning disabilities. www.anncrafttrust.org T **0115 951 5400**

4. Allegations of previous abuse

Allegations of abuse are occasionally made some time after the event, for example by an adult abused as a young person by a member of staff who may be still working with children or Adults at Risk. Where such an allegation is made, you should follow the procedures relating to the involvement of statutory agencies (section 2 & 3). This is because other Adults at Risk, either within rowing or in other environments, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse should automatically be excluded from working with at Risk groups.

5. Safeguarding Adults at Risk in the club

5.1 Club Welfare Officer (CWO)

Every rowing club that has Children and/or Adults at Risk regularly using its facilities must appoint a Club Welfare Officer (CWO). This person must have a good awareness of Adults at Risk and the difficulties they face, good communication skills and an ability to provide support and advice. They should also be well organised, have good administrative and recording skills and an ability and willingness to promote and implement the British Rowing *Safeguarding & Protecting Adults at Risk Policy*, procedures and resources.

The CWO should be a figure well-known in the club and approachable by Adults at Risk but not someone involved directly in the coaching or day-to-day running of Adults at Risk rowing programmes. It is advisable that the CWO is a registered member of British Rowing. It is essential that the CWO is able to act in a confidential manner and to recognise the boundaries of his or her competence, role and responsibilities and where to seek advice and support. The role and responsibilities of a CWO are outlined in section 5.1 and 6.1.

5.2 Codes of conduct

Codes of conduct are useful for everyone concerned with rowing to outline the expected behaviour of different groups. There are a number of different codes of conduct and many clubs will already have adopted and adapted their own. British Rowing has published a comprehensive code of conduct document that contains ideas for model codes. It may also be useful to consider developing specific codes of conduct for parents and carers, athletes and other members and you may wish to consider consulting participants who are considered to come within the Adult at Risk category and their carers on other areas they might wish to include. The British Rowing Codes are available from the website at www.britishrowing.org/publications

5.3 Changing rooms

- Where it is felt that supervision is necessary for Adults at Risk, this should be undertaken by two or more personnel
- Adult coaches or volunteers should not shower or change at the same time as the at Risk

- individuals they have been working with
- No staff or volunteers, medical or otherwise should be present when Rowers of the opposite sex are showering or changing (for example a male coach working with a female crew)
- In mixed gender clubs separate changing facilities should be available. If an Adult at Risk is uncomfortable showering or changing in public, no pressure should be put on them to do so; they should be encouraged to change and shower at home
- Adults at Risk and, where appropriate, their Carers should be involved in deciding how best they can be assisted. Always ensure the Adult at Risk consents to the assistance that is offered
- No photographic equipment should be used in the changing room environment. This includes cameras, video cameras, camera phones etc.

5.4 Coaching Ratios

Although there is Government guidance for people working with Adults at Risk such as that found in the *No Secrets* guidance, it is essential in rowing that a separate Risk Assessment is undertaken for each group of Adults at Risk and that this is reviewed for each training session. Participants who require care or support from other adults for whatever reason, even those qualified as coaches, should be supervised at all times.

In line with the national guidance the level of supervision should take account of:

- any disability and level of physical and mental ability of each individual
- the extent of dependency of the Adult at Risk on carers/parents
- the type of training session being undertaken: on land or water
- the individual's scope for developing independence
- the environment that the session is taking place in
- a specific risk assessment

If there is an accident or incident you should ensure there is always someone available to supervise the other Adults at Risk; coaches should ensure they never work in isolation.

5.5 Local Multi-Agency Safeguarding Adults Committee

The British Rowing *Safeguarding & Protecting Adults at Risk Policy* and the guidance contained in this document and its appendices are consistent with the government's *Safeguarding Vulnerable Groups Act 2006*. However, clubs and regions should endeavour to make themselves aware of the local authority protection of Adults at Risk arrangements, policies and procedures as they relate to sports. The CWO should obtain the Local Authority lead officer's name and contact details.

5.6 Regulated Activity with adults

The Freedom of Protections Act 2012 limits the scope of Regulated Activity with adults to areas that are unlikely to fall within the sports environment. See the Glossary for more details.

6. Designated persons with responsibility for safeguarding Adults at Risk in rowing

6.1 The Club Welfare Officer

6.1.1 Responsibilities

The CWO needs to have awareness and understanding of the British Rowing *Safeguarding & Protecting Adults at Risk Policy* and procedure, and keep up to date with the appropriate training. The

CWO is responsible for acting as a source of advice on safeguarding Adults at Risk and issues relating to their protection. The CWO must also co-ordinate club responses and actions, in line with British Rowing policy and procedure, to referrals and expressions of concern about Adults at Risk. Ideally the post holder should be a member of their club's committee.

6.1.2 Role related to SPAaR policy

- To provide information and advice on protection for Adults at Risk within the club. To ensure that the club adopts and follows the *British Rowing Safeguarding & Protecting Adults at Risk Policy* and procedures, understands its responsibilities under the SVG Act, and promotes awareness of these within the club.
- To be a confirmation signatory, verifying the identity of individuals completing DBS Disclosure application forms.
- To keep records of all those who have been vetted within the club and to ensure that DBS checks are updated on at least a three yearly basis.
- To receive information from club staff, volunteers, Adults at Risk, parents, carers or advocates who have protection concerns regarding Adults at Risk and record it.
- To assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- To report concerns where appropriate to the police in consultation with the individual or their carer.
- To report referrals or concerns to the British Rowing LSO as soon as possible in line with British Rowing procedures.
- To ensure that adequate information is available at the time of referral and that the referral is confirmed in writing, under confidential cover, where possible using the British Rowing Incident Report Form (WG 1.2).
- To advise club officers regarding the appropriate levels of protection required during the training of Adults at Risk from all individuals working with at Risk groups in the club.
- To promote an equal opportunities approach within the club, by maintaining anti-discriminatory practice standards, acknowledging that discrimination exists, actively addressing instances in line with British Rowing policy and procedure and encouraging club members receive training to raise awareness and improve understanding of discrimination.
- To advise the club of relevant training opportunities.

The CWO should undergo the vetting procedure outlined in section 7.

6.2 British Rowing Lead Safeguarding Officer (LSO)

This should be someone with good knowledge and understanding of the issues that Adults at Risk face in the sporting environment and a focussed approach to addressing concerns, raising awareness and improving practice. The post holder must be able to communicate effectively to provide advice and support at all levels. They should have influencing skills and an ability to work with conflict and with emotionally distressing matters. Knowledge of relevant legislation, government guidance, the *British Rowing Safeguarding and Protecting Adults at Risk/Children Policies* and procedures is essential. The ability to confront poor and discriminatory practice and also to promote and demonstrate high standards of anti-discriminatory practice in relation to safeguarding and abuse is also essential.

6.2.1 Responsibilities

The British Rowing LSO has overall responsibility for the development and establishment of the British Rowing's approach to safeguarding children and Adults at Risk.

6.2.2 Role related to SPVA Policy

- To liaise with the specialists and investigators who may be brought in to help with Adult at Risk cases regarding individual cases, proposed policy and guidance.
- To convene and chair the Case Management Group as required. To convene and chair the Safeguarding Vulnerable Groups Panel meetings at least three times a year. To take a lead

role in maintaining and reviewing the British Rowing's *Safeguarding Adults at Risk Implementation Plan*.

- To coordinate the dissemination of this policy, procedures and related resources throughout British Rowing.
- To represent the British Rowing at external meetings related to the protection of children and Adults at Risk.
- To receive reports of referrals and investigations from the Case Manager or investigators on behalf of the Case Management Group and convene meetings of the Case Management Group.
- To keep up to date with own knowledge and skills.

The LSO should undergo the vetting procedure outlined in section 7.

6.3 Case Management Group

This group must work within the policies and procedures of British Rowing to ensure that all decisions relating to safeguarding Children and Adults at Risk are reached following a fair, open and transparent process. The group comprises: the British Rowing LSO and at least two other suitably qualified, independent persons. It may call upon whatever professional input is required on an advisory capacity for each case.

6.3.1 Responsibilities

- To recommend, where appropriate, that a person is referred to the DBS where they may be a threat to vulnerable individuals such as Children or Adults at Risk
- To recommend to the Officers of British Rowing, where appropriate, that a person is temporarily suspended or banned from some or all activities related to rowing
- To monitor and review progress on all cases and to identify any trends emerging which require a review or revision of existing policies and procedures

6.3.2 Role in relation to the SPVA policy

- To make decisions on the initial approach to all reported cases related to the welfare and protection of Adults at Risk. That is, to decide on the 'route' a case will take, either internally or via external referral to statutory agencies, but may also include making decisions in relation to concerns arising from information gathered in the recruitment process.
- To make initial decisions as to the 'internal' level each case shall be dealt with. For example minor poor practice cases may be referred back to the club complaints or disciplinary process
- To advise others within British Rowing about actions they may need to take, such as initiating disciplinary procedures.
- To confirm all final decisions relating to Safeguarding Referrals or DBS Disclosures. Each closure document must be signed by at least two of the CMG members, showing clearly the identified actions and considerations taken.

The members of the CMG should undergo the vetting procedure outlined in section 7.

7. Recruiting and Selecting People to work with Adults at Risk

Anyone may have the potential to abuse Adults at Risk in some way and it is important that all reasonable steps are taken to prevent unsuitable people from working with them. This applies to anyone whether voluntary or paid who is going to have **Significant Access** to Adults at Risk.

The responsibility for having safe recruitment processes in place rests with the organisation providing the activity, i.e. the local organisation, event or club. These procedures apply equally to paid or unpaid persons within your club or event who are working on programmes, courses or events specifically aimed at Adults at Risk, or regularly with groups of Adults at Risk.

New volunteers and paid staff working in a role that entails Significant Access to Adults at Risk, or where they have a Position of Trust, or existing volunteers or staff who change their role to work with these vulnerable groups, are required to complete the following vetting process:

- Complete an application form. This will help assess the applicant's suitability to work in the role, based on their skills and competencies as well as eliciting information about an applicant's past
- Complete a self-disclosure about any matter that might influence their suitability to work with Adults at Risk
- Provide two appropriate referees (WG 2.4 is provided for this purpose)
- Provide evidence of their identity (such as a driving licence with photo or passport)
- Complete a Criminal Records Check at the Enhanced Level for the specific role

In addition if the person is to be working in Regulated Activity with Adults (see Glossary) they must complete a Barred Lists Check. Please note that it is a criminal offence to employ someone in paid or unpaid role in Regulated Activity if they are on the Barred List. It is also a criminal offence for a person who is on the Barred List to apply for a role in Regulated Activity.

The CWO must maintain records of any references including written records of verbal references.

The procedure for obtaining a DBS Enhanced Disclosure is contained in WG2.2, and advice on completing the form can be found in WG2.3.

Note: Completing the above process does not guarantee that the individual is safe to work with Adults at Risk. British Rowing will use information from the DBS as part of an overall recruitment and selection process to assess any potential risk. The club will also need to assess for itself the individual's suitability by taking up references, interviewing and supervision.

Completing a DBS Disclosure application is a particularly confidential and sensitive matter for some people and care should be taken to explain how any information contained on the Certificate will be treated. This is explained fully in the Recruitment of Ex-Offenders Policy (WG 2.1). British Rowing's policy on the secure storage, handling, use, retention and disposal of Disclosures and Disclosure Information (WG2.8) is available on the British Rowing website.

Detailed notes for CWOs relating to this process are contained in WG 2.11

Any disclosures will be dealt with confidentially following the guidance set out in *Information Sharing: Guidance for Practitioners and Managers*, HM Government 2008.

Criminal Record and, where relevant, Barred List Checks must be renewed every three years if a person remains in post or more regularly if, for example, there is a concern raised, if the person changes their role or if the person has been absent from the club for a significant period

7.2 Who should have a Criminal Records Check?

Every rowing club that has Adults at Risk regularly using its facilities must ensure that the following roles are properly vetted:

- Club Welfare Officer (CWO)
- coaches who regularly coach Adults at Risk
- trailer drivers or volunteers who regularly spend time away with Adults at Risk at regattas or training camps

In line with the definition of Regulated Activity in the Glossary anyone transporting those considered 'Vulnerable Adults' under the 'No Secrets' definition must be checked against the Barred List.

If in doubt phone British Rowing for advice.

8. Awareness and training

8.1 Training for staff and volunteers

Training should be provided for staff and volunteers on the policy, procedures and professional practices that are in place and commensurate with their responsibilities in the Adult at Risk protection process. Training should take place at all levels of British Rowing to ensure that procedures are carried out consistently, it should also be considered as a continuing responsibility. This should include:

- awareness training in the abuses that can take place and the duty to report
- specialist training for investigators and managers
- issues relating to staff safety within a Health and Safety framework

To create an enjoyable and safe environment for all Adults at Risk, everyone involved in rowing must be aware of what good practice is and how to deal with poor practice and abuse.

Formal training will help people to work safely and effectively with Adults at Risk by:

- comparing their own practice against what is regarded as good practice and identifying ways to improve
- ensuring that they are not placing themselves at risk from allegations
- recognising their responsibilities and reporting any concerns about suspected poor practice or abuse
- understanding the recruitment and selection procedures described (Section 7)

The CWO should maintain a written record of training and relevant qualifications of those working with Adults at Risk within the club.

8.2 Recommended levels of awareness and training

Within the club environment everyone has a responsibility to be aware of the *Safeguarding & Protecting Adults at Risk Policy*, understand what is good and poor practice and know what to do if they have a concern. All members should have access to the policy document at the club or be made aware that it can be accessed through the British Rowing website.

8.3 Training

Coaches and volunteers may undertake the generic sports coach UK courses such as *Equity in your coaching* and *Creating a safe coaching environment*. Information is available on the Sportscoach UK website www.sportscoachuk.org

A number of local authorities also run basic awareness level safeguarding courses although these will not be specific to rowing and may not be specific to sport.

British Rowing will promote all Safeguarding & Protecting Adults at Risk training via regional newsletters and the British Rowing website www.britishrowing.org

See table below.

Role	Have read BR Adults at Risk Policy	Basic Awareness Module	Sportscoach UK Adults at Risk workshop or equivalent
Membership Secretary	✓		
Club Welfare Officer (CWO)	✓	✓	✓
Coaches of Adults at Risk	✓	✓	✓
Co-ordinator or manager of Adults at Risk or coaches	✓	✓	✓
Trailer drivers who may travel with Adults at Risk	✓		
Club residents	✓		
Club officers / committee members	✓	✓	
Volunteer / Parent / Carer / Helper	✓		
Bar staff	✓		
Competition organiser	✓	✓	
Umpire / race official	✓		
Club employee / steward	✓		

9. Complaints & disciplinary procedures

British Rowing has its own Complaints and Disciplinary Procedure (WG 1.7) for dealing with breaches of the *Safeguarding & Protecting Adults at Risk Policy* and procedures.

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

If the abuse is alleged to have been committed in the course of a person's employment, he or she will be subject to whatever disciplinary procedures and sanctions are stated in their employment contract. British Rowing may decide to await the outcome of such procedures before starting its own investigation.

In accordance with British Rowing's Rules, British Rowing may impose disciplinary sanctions against clubs who fail to adopt and implement the *Safeguarding & Protecting Adults at Risk Policy* and procedures, particularly if such failures are serious or persistent. If concerns remain once a matter has been handled by the club these should be referred to the LSO who will ask the senior officers of British Rowing to decide how to deal with this and whether or not to initiate disciplinary proceedings.

Every effort will be made to maintain confidentiality for all concerned, and consideration will be given to what support may be appropriate to Adults at Risk, carers, parents, members of staff and volunteers.

It is not always possible to determine exact timescales for when cases will be resolved, however British Rowing will always try to ensure that all parties know what procedure will be followed and

what the expected time scales are. If there is a delay they will endeavour to inform all parties why there is a delay and when any development is expected. There should not be any period without communication of more than 28 days with involved persons. Ideally case management processes should not extend over more than 3 months; only in exceptional circumstances should they extend up to 6 months.

10. Implementation and monitoring procedures

British Rowing has established a Safeguarding Vulnerable Groups Panel (SVGP) to oversee the implementation of these procedures and to monitor their application in practice.

It is the SVGP's responsibility to check that:

- British Rowing's procedures continue to reflect the current recommendations of external agencies that specialise in Child and Adult at Risk protection
- The procedures are disseminated and applied by British Rowing members and staff.

The SVGP has designed a checklist for clubs and other organisations to monitor their own compliance with the requirements set out in this booklet (Club Audit WG 3.6). From time to time, checks will be conducted to verify the results of this self-monitoring procedure. Clubs who have junior members, Children or Adults at Risk regularly visiting must ensure that the name and contact details for their CWO, or in the case of an educational establishment, the person with responsibility for welfare, are completed in their British Rowing Annual Return. This information must be updated, as necessary, during the year by the club secretary or other senior club officer.

The SVGP will make an annual report to British Rowing's Executive Board, through the LSO, on the progress of its activities in implementing and monitoring these procedures, and on the incidence and outcome of cases that have arisen in the year. The SVGP may from time to time call upon external expert advice in auditing its procedures and improving its policies.

April 2013