



# WRU SAFEGUARDING POLICY

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## Foreword by CEO

I am delighted to provide the foreword for the new Safeguarding Policy, which outlines the continuing commitment of the Welsh Rugby Union to develop and maintain a safe and positive environment for all children and adults at risk who participate in Rugby Union across Wales.

Safeguarding is a key component of the Welsh Rugby Union's drive to support the work of our volunteers in our communities and clubs across Wales. We understand the importance of evolving our policies, procedures and practice, and managing that change through consultation and dialogue with stakeholders. We want to ensure that all people involved in our great game have the opportunity to participate more often, with more enjoyment, and ultimately leading to more success.

The WRU has an experienced Safeguarding Team who work within the Rugby Operations Department, working in partnership with clubs and other organisations to provide a quality experience for everyone to enjoy the game in a safe and positive environment.

The WRU work closely with the Disclosure and Barring Service (DBS), the National Society for the Prevention of Cruelty to Children (NSPCC) and the Ann Craft Trust (Safeguarding Adults to Risk) to ensure that we have robust and effective risk management procedures. This is extremely important when recruiting employees and volunteers, who will have unsupervised contact with children and adults at risk within Welsh Rugby.

The WRU has made significant strides in working towards achieving the National Safeguarding Standards framework set by the NSPCC and the Child Protection in Sport Unit, and have achieved Level Three of these standards, which is the highest level that can be achieved.

We now have over 300 Club Safeguarding Officers (CSO) in volunteering roles operating in our clubs, and they are supported by the WRU Safeguarding Team in providing timely and assured advice and guidance, along with training opportunities to empower and up-skill our volunteer workforce.

We will continue to work alongside our clubs to strengthen all aspects of our safeguarding activities so that everyone involved in Welsh Rugby continue to enjoy the sport within a safe and positive environment. The feedback received from surveys conducted indicate that there is a real positive working relationship between the CSO's and the WRU Safeguarding Team, based on the principle that the welfare of the child or adult at risk is the paramount consideration.

The involvement of CSO's and other volunteers in shaping things for the future is a positive step in ensuring that we have a robust but practical approach to safeguarding.

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

### **Martyn Phillips**

Welsh Rugby Union Group Chief Executive



## **Foreword by NSPCC (Child Protection in Sport Unit)**

All children and young people have the right to participate in their chosen sport in a safe and positive environment. National governing bodies of sport have a responsibility to ensure that there is appropriate support for volunteers, staff and players, including practical guidance, to assist them to safeguard children in a rugby environment.

This revised version of the Welsh Rugby Union Safeguarding Policy provides volunteers and staff with comprehensive safeguarding advice and current best practice guidance. The policy outlines an exemplary process for investigation of poor practice and abuse concerns reported in a rugby environment.

The WRU has consulted with a wide range of stakeholder involved in rugby clubs across Wales in developing and shaping this policy, including coaches, parents and volunteers. The WRU has also engaged with children and young people to ensure that the policy is both child centred and rugby focussed, and most importantly can be practically applied by clubs.

The NSPCC Child Protection in Sport Unit is pleased to endorse this revised version of the WRU Safeguarding Policy. We commend the work that the WRU is undertaking to safeguard children within Welsh rugby and also in the wider sport sector in Wales.

### **Anne Tiivas OBE**

Director Child Protection in Sport Unit, NSPCC

## **Foreword by Ann Craft Trust (Safeguarding Adults in Sport)**

The Welsh Rugby Union have made it very clear that Safeguarding within their sport is a key expectation at strategic and operational level. In doing so they have recognised and been very clear that they have a duty of care to everyone within their structure, including adults at risk

The Ann Craft Trust now work with Sport Wales and all Welsh Sport National Governing Bodies to build and enhance safeguarding arrangements for adults at risk within sport.

The term 'adults at risk' is relatively new, introduced by the Social Services and Well-being Act (Wales) in 2014. The definition of adult at risk introduced by this legislation is broad, meaning that any one of us could find ourselves an adult at risk within our sports...

An 'adult at risk' is an adult who:

1. Is experiencing or is at risk of abuse or neglect, and
2. Has needs for care and support, and
3. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The WRU have been pro-active in introducing this legislation within their policy – being one of the first sports in Wales to do so, which recognises their genuine desire to make rugby safer and more inclusive for all.

Welsh Rugby, like most sports, relies on the hard work of volunteers throughout Wales. Everyone within sport has the opportunity to make a genuine difference to children and adults at risk by creating safe environments, where it is truly recognised that safeguarding really is everyone's responsibility. Increasing participation is a challenge in all sports, the WRU's approach here encourages the creation of genuinely safe surroundings to give rugby the opportunity to grow and flourish in accordance with their strategic vision and purpose.

The Ann Craft Trust is now based alongside the NSPCC Child Protection in Sport Unit (CPSU) in Wales, providing a central team of safeguarding expertise available to everyone within Welsh sport.

The WRU Safeguarding team are very experienced, with a wealth of operational knowledge genuinely making a difference within rugby and indeed throughout Welsh sports. It would be remiss of me not to thank the WRU Board and Management for their significant safeguarding investment across all of Welsh rugby, and also for recognising their duty of care to adults at risk within their sport.

**Ieuan Watkins**

Safeguarding Adults at Risk Manager (Wales), Ann Craft Trust

## Acknowledgements

Welsh Rugby Union has drawn on work and good practice from many different agencies across England and Wales in the production of this policy. Every effort has been made by the WRU to ensure the accuracy of this information. The Policy is meant as general advice and should a query arise, the individual is advised to contact the WRU Safeguarding Team (Rugby Operations Department)

We would like to thank all of the different agencies for their contribution and support, and their kind permission for use and adaptation of materials.

We also acknowledge the good practice shared by certain agencies and websites used to gain background information in the production of this document.

- Ann Craft Trust
- Child Protection in Sport Unit Website (CPSU)
- Disability Sport Wales
- Disclosure and Barring Service (DBS)
- England and Wales Cricket Board
- Sport Wales
- Welsh Sports Safeguarding Lead Officers
- Wales Sports Association (WSA)
- WRU Safeguarding Policy Review Group
- WRU Youth Board

We also wish to acknowledge the assistance received from various Local Safeguarding Boards across Wales and the four Welsh Police forces in providing advice and guidance when preparing this document.

Special thanks also to the other sports whose work in this field has been a valuable source of information and inspiration.

## Introduction – Welsh Rugby Union Safeguarding

Everyone who participates in Welsh rugby is entitled to do so in an enjoyable and safe environment, and that their experience is a positive one. The WRU will engage regularly to ensure that coaching and referee provision across Wales, services the needs and wants of everyone involved in the game whilst acknowledging, thanking and rewarding those community and aspiring coaches, officials and volunteers. The WRU has a moral and legal obligation to ensure that, when given responsibility for players, coaches, referees and other volunteers it provides them with the highest possible standard of care.

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

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

Coaching is a key aspect of this development and clubs need to understand their responsibility for promoting and delivering good coaching practice, which will ultimately provide a positive rugby experience.

The WRU is committed to devising and implementing policies so that everyone involved in rugby in Wales accepts their responsibilities to safeguard children and adults at risk from harm and abuse and actively promote equality of opportunity. This means that there is a responsibility to follow procedures to protect children and adults at risk, and report any concerns about their welfare to appropriate authorities.

The aim of the policy is to promote good practice, and develop protective measures that are appropriate, to ensure that children, young people and adults at risk have positive experiences from their involvement in rugby.

The WRU strives to create a safe and positive environment for all whilst in the care of the affiliated clubs. With an embedded safeguarding culture amongst the rugby community it allows staff and volunteers to make informed and confident responses to specific safeguarding issues.



## Welsh Rugby Union Vision and Purpose

The Welsh Rugby Union's (WRU) vision is to have more people participating in the game, more often with more enjoyment and more success.

Our purpose is to grow, develop, and enhance, whilst future proofing rugby union in Wales by broadening our appeal and ensuring that we are inclusive and engaging to all ages and communities.

Our purpose and vision and are underpinned by values and beliefs which embrace integrity, excellence, success, courage, family and humour.

The WRU are firmly committed to ensuring that all children and adults at risk, regardless of gender, sexual orientation, age, parental status, disability, religion or belief, gender reassignment, race, ethnic or national origins, or socio/economic background enjoy rugby in a safe environment across the country.

The WRU has a responsibility to encourage, lead and advise all people involved in rugby whether paid or voluntary to understand, adhere to and promote the effective policies and procedures that are in place. This Policy sets out procedures in line with legislation, WRU Disciplinary Regulations and the National Safeguarding Standards.

The policy also includes best practice examples, guidance and supporting documents, all of which can help to guide the policies and practices of WRU affiliated Clubs and other rugby organisations.

In the last few years the Welsh Rugby Union (WRU) has undertaken a thorough review of how we manage our safeguarding responsibilities. During the initial phase, we have promoted the benefits of basic safeguarding principles and the need to have a sound base to work from through a collaborative approach with clubs and partners. The WRU are confident that they have built solid safeguarding foundations, and are fully committed to achieving and maintaining the NSPCC Standards for Safeguarding Children in Sport.

The WRU has been engaged in working towards making our sport safer for all to enjoy in Wales for many years. We understand and appreciate the need to constantly develop and promote our policies and procedures, with a constantly changing safeguarding landscape. We understand the importance of managing change by working with the clubs to develop and grow our game.

We also recognise that there are other challenges, and we are committed to developing operational and practical strategies to respond to these issues. We also know that our relationship with rugby clubs across Wales is a key factor in developing a robust and effective approach to safeguarding, with policies that are based on the needs of volunteer practitioners.

We value the guidance and support that we receive from the Child Protection in Sport Unit (CPSU) and Sport Wales, and we fully support their efforts to continually raise safeguarding standards within sport.

Working closely with Sport Wales and other National Governing Bodies, we ensure our policies and procedures are complimentary which allows us to work across geographical boundaries for the good of our collective sports. We are committed to working with other sports across Wales to develop and implement best practice, as we recognise the need to have a collaborative approach so that we learn and develop together.

The WRU have worked closely with stakeholders and other partnership organisations to develop this policy which underpins the safeguarding work being conducted within our sport.

The WRU will review its policy and procedures on an ongoing basis in line with changes in legislation and will conduct a full review on a three yearly basis. The safeguarding provision is reviewed annually with the NSPCC through the National Safeguarding Standards, and the next full review of this Policy will take place in 2022.

## The Welsh Rugby Union Strategy

The WRU Strategy is underpinned by our culture, leadership and governance and led by our values.

### Living our Values

#### Culture

We will be led by our values, embrace our reality, focus on solutions and dare to dream for an ambitious future.  
We will take a long term perspective to deliver a sustainable game for future generations.

#### Leadership

We will be open and transparent and involving in how we lead the game. We recognise our responsibility as role models. We will lead to inspire.

#### Governance

We have a responsibility to be agile and inclusive. We will implement the right governance systems and structures with suitably qualified individuals who are reflective of modern society.

#### Courage

A no compromise, no regrets philosophy – daring to dream.

#### Humour

Bringing a perspective and recognition that we do this for enjoyment.

#### Integrity

Doing the right thing even when no one is looking.

#### Excellence

'Good enough' isn't good enough. Relentless pursuit of our ambition and a recognition that it's okay to make mistakes to become better.

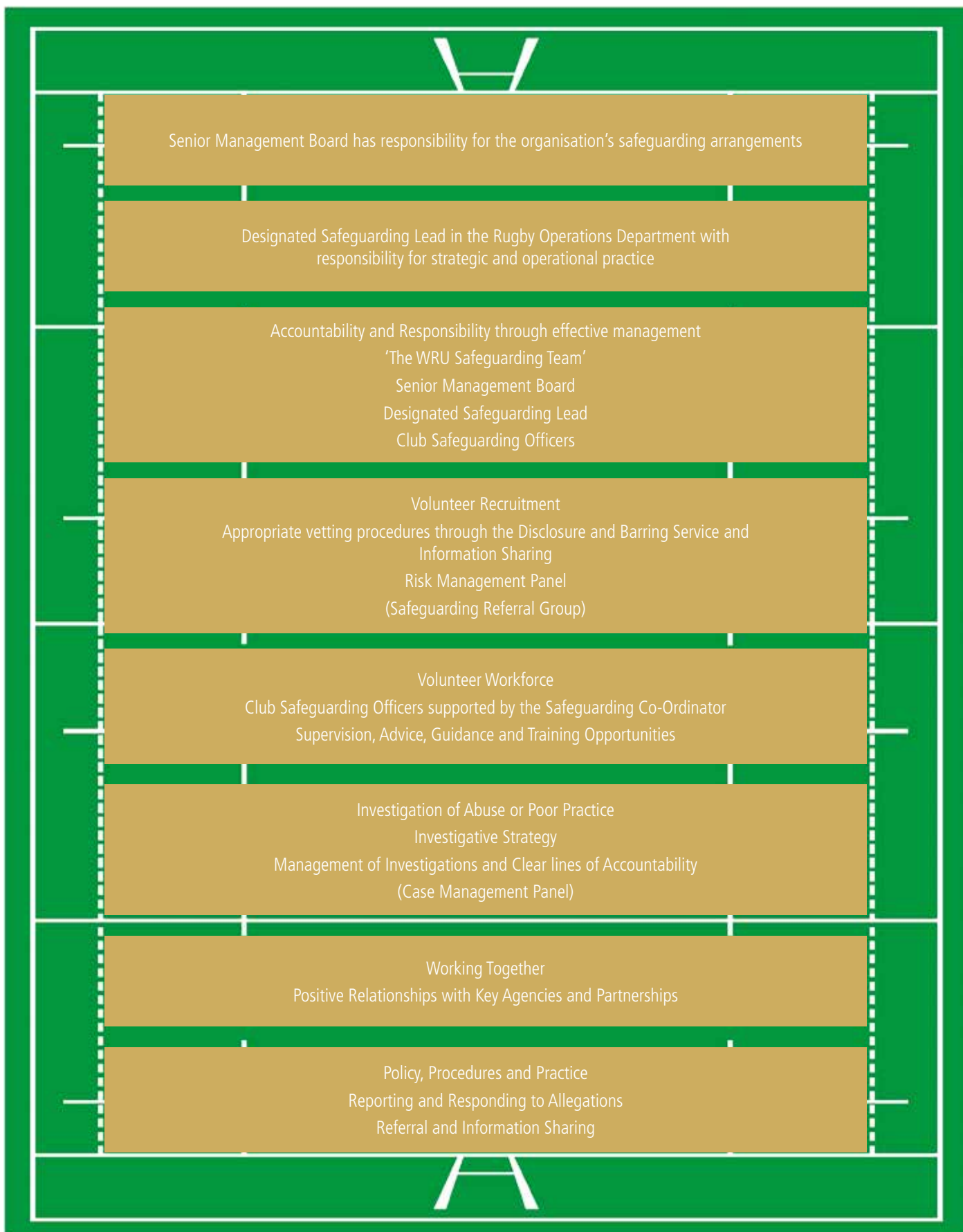
#### Family

Inclusive and welcoming to all – the rugby family. Committed to each other's success.

#### Success

Achieving on and off the field – responsible for each other's reputations.

## 'Don't Tackle it Alone'



# **TERMINOLOGY AND DEFINITIONS**

## TERMINOLOGY AND DEFINITIONS

<b>Abuse (Children)</b>	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
<b>Abuse</b>	Abuse is a violation of an individual’s human and civil rights by another person or persons.
<b>Adult</b>	Adult is anyone aged 18 or over
<b>Adult at Risk</b>	An ‘Adult at risk’ is an adult who: <ol style="list-style-type: none"> <li>1. Is experiencing or is at risk of abuse or neglect, and</li> <li>2. Has needs for care and support, and</li> <li>3. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.</li> </ol>
<b>Adult Safeguarding</b>	Adult safeguarding is protecting a person’s right to live in safety, free from abuse and neglect.
<b>Appeal Panel</b>	This is a panel appointed to hear an appeal in accordance with the WRU Case Management procedures
<b>Capacity</b>	Capacity refers to an individual’s ability to make a decision or take a particular action for themselves at a particular time, even if they are able to make other decisions. For example they may be able to make small decisions about everyday matters such as what to wear for sports activity, or what a healthy sports diet would be, but they lack capacity to make more complex decisions about financial matters.
<b>Case Management Panel</b>	This is a panel appointed to apply safeguarding measures or other appropriate actions to safeguard people involved in Welsh Rugby.
<b>Children</b>	Children is anyone under 18
<b>Codes of Conduct</b>	These are a set of standards of behaviour that promote the values of our game, to ensure that the reputation and integrity of the game is maintained.
<b>Disabled</b>	The Disability Discrimination Act (1995) defines a person as having a disability ‘if he has a physical or mental impairment which has substantial and long-term adverse effect on his ability to carry out normal day to day activities’.
<b>Disciplinary Regulations</b>	The WRU Disciplinary Regulations and Codes of Conduct, which can also be applied in managing safeguarding matters.

<p><b>Emotional Abuse</b></p>	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p> <p>In loco parentis In loco parentis (from Latin meaning ‘in place of a parent’) refers to a person who has been given explicit permission to assume parental responsibility for a child by his or her parents or legal guardian.</p>
<p><b>Misconduct cases</b></p>	<p>These are Code of Conduct cases that are referred through the Safeguarding Case process.</p> <p>Management procedures (if it is felt that there is a safeguarding risk involved) or through the Disciplinary procedures.</p>
<p><b>Need to know</b></p>	<p>In the context of sharing confidential information, disclosing details only to those people who have to be informed in the interests of a child or children. The factors that need to be considered when determining whether to disclose information include: the reason for sharing the information; the level of detail that needs to be disclosed; with whom the information will be shared; and whether disclosing the information is a proportionate response to the need to protect a child from harm.</p> <p>Other Rugby Related Activity This is the activity that is undertaken in a rugby related environment (on or off the field) where someone is in a role that does not have unsupervised access to children on a regular basis. In general terms this would apply to Players, Rugby Administrators, Club Officials or other Volunteers.</p>
<p><b>Parental responsibility</b></p>	<p>The legal rights, duties, powers, responsibilities and authority a parent has for a child and their property. A person who has parental responsibility for a child has the right to make decisions about their care.</p> <p><b>Person Subject of Concern (PSC)</b> <b>Person Subject of Concern (PSC)</b></p>
<p><b>Regional Safeguarding Boards</b></p>	<p>These are strategic bodies with responsibilities to ensure effective safeguarding of children and adults at risk across key agencies.</p>

<p><b>Regulated activity (Children)</b></p>	<p>For the purposes of identifying roles or individuals qualifying for DBS checks, as part of the child workforce, regulated activity is defined as: Unsupervised contact with children through teaching, training, instructing, caring for, supervision, providing advice and guidance on well-being or transport specifically for children regularly</p> <ul style="list-style-type: none"> <li>• Once a week or more</li> <li>• Four or more occasions in a period of 30 days</li> <li>• Overnight between 2.00 a.m. and 6.00 a.m.</li> </ul>
<p><b>Rugby regulated activity</b></p>	<p>This is the activity that is undertaken in a rugby related environment (on or off the field) where someone has unsupervised access to children, as in the definition of regulated activity above. This would apply to Coaches, Team Managers, First Aiders, Medical Staff and Referees</p>
<p><b>Safeguarding</b></p>	<p>Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.</p>
<p><b>Safeguarding Measures</b></p>	<p>These are measures that are taken to ensure that appropriate safeguarding is implemented when a risk has been identified. These can involve a variety of actions and are outlined in detail in the WRU Safeguarding Disciplinary and Case Management procedures</p>
<p><b>Safeguarding and Promoting the Welfare of Adults</b></p>	<p>Promoting the importance of safeguarding adults throughout the whole organisation. Recognising that there is a duty of care to everyone within the organisation. Responding proportionately where abuse or neglect is suspected. Understanding that adults should be fully involved and able to influence decisions in respect of their welfare.</p>
<p><b>Sexual Abuse</b></p>	<p>This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.</p> <p>The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).</p> <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>
<p><b>Social Services</b></p>	<p>Throughout the procedures the generic term social services is used to represent the relevant local authority social services functions with regard to children and adults at risk</p>
<p><b>Young Carers</b></p>	<p>Children and young people who assume important caring responsibilities for parents or siblings, who are disabled, have physical or mental health problems, or misuse drugs or alcohol.</p>



**BACKGROUND**

## **BACKGROUND - SAFEGUARDING CHILDREN AND ADULTS AT RISK**

### **Safeguarding Children**

The key principles that underpin working with children and families are found in the Children Act 1989 and 2004 and the UN Convention on the Rights of the Child, which the Welsh Assembly Government adopted as the basis for its work with all children and families in Wales. In Children and Young People: Rights to Action 2004 the Welsh Assembly Government established seven core aims through which it would work to ensure all children:

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

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

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



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

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

It is essential that safeguarding and promoting the welfare of children is deeply embedded in the provision of service for children and reflects the principles and practices outlined in Safeguarding Children: Working Together under the Children Act 2004. The WRU has developed comprehensive policies and procedures that comply with relevant legislation.

The implementation of this safeguarding policy, associated procedures and practice guidelines will help to minimise the risk of abuse; foster an environment where concerns can be shared and inappropriate behaviour challenged; and provide parents and carers with reassurance that they are leaving their children in a safe setting.

## **Safeguarding Adults at Risk**

The Welsh Rugby Union are committed to creating and maintaining a safe and positive environment and accept our responsibility to safeguard the welfare of adults at risk involved in our sport.

An 'Adult at Risk' is a person aged 18 or over who is in need of care and support regardless of whether they are receiving them, and because of those needs are unable to protect themselves against abuse or neglect.

A disabled person is not necessarily an adult at risk, and an adult at risk may not have an impairment.

We encourage and support partner organisations, including clubs, clusters, districts and regions to adopt and demonstrate their commitment to the principles and practice of equality as set out in this safeguarding policy.

The Social Services and Well-being Act 2014 provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales.

The main principles of the Act are as follows –

- People are at the heart of the new system by giving them an equal say in the support they receive
- Partnership and co-operation drives service delivery
- Services will promote the prevention of escalating need and the right help is available at the right time.

# **POLICY STATEMENT AND CORE PRINCIPLES**

## **POLICY STATEMENT AND CORE PRINCIPLES**

The WRU acknowledges the duty of care to safeguard and promote the welfare of children and adults at risk, and is fully committed to developing robust policies and procedures that minimise the risk of children, young people and adults at risk experiencing abuse within the sport setting.

The recent publication of the Duty of Care (Independent Report to Government) written by Dame Tanni Grey-Thompson, has highlighted a number of safeguarding recommendations, and these will be considered by the WRU in implementing and managing our safeguarding responsibilities.

The WRU also has a responsibility to ensure that within all the programmes it funds, the affiliated Clubs have established policies and provide protection to children, young people and adults at risk.

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

The WRU Safeguarding Policies and Procedures are mandatory for anyone within the sport who is involved either directly or indirectly with children and adults at risk as part of their role in the sport. Any volunteers who are involved in this capacity on behalf of the WRU or a WRU registered club must demonstrate that they have met equivalent standards as those set out in the policy and will be required to comply with the WRU Safeguarding Policy, for the duration of their involvement within the sport.

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

The policy is intended as a reference tool for Club Safeguarding Officers, who have responsibility to report to Club Management Committees in order to plan and implement safeguarding measures and activities within our clubs. The policy also includes information on how the case management procedures operate. However it should also be available to provide practical advice to all club members including parents, carers, children, coaches, and other club volunteers. The policy is based on legislation that is relevant at the time of publication.

It is a document that should be used to provide a basic understanding of safeguarding and a source of practical advice and guidance for those involved in rugby throughout Wales.

(The policy is also available to download in both Welsh and English language versions on the Welsh Rugby Union website)

## Policy Aims

This Safeguarding Policy aims to:

- Clarify what is required in relation to the protection of children and adults at risk
- Highlight the commitment of the WRU to safeguarding issues
- Recognise that the safety and welfare of the child is paramount, and that the child is potentially at risk when child abuse is reported or suspected
- Recognise that the safety and welfare of adults at risk needs to be appropriately managed to protect them from abuse or neglect.
- Recognise the need to promote the rights of children and adults at risk involved in rugby
- Set and implement standard procedures to protect children, young people and adults at risk when suspected or actual abuse is reported
- Ensure that adequate steps are taken to ensure that unsuitable people are not employed or deployed in activities or programmes
- Create a safe and positive environment for children, young people and adults at risk
- Help ensure that all staff/volunteers are supported and trained to recognise and respond appropriately to safeguarding or poor practice concerns (e.g. to follow the process outlined for reporting concerns) Assist all Clubs and Volunteers to understand the correct procedures
- Allow people to make informed decisions about the appropriateness of facilities they use and those they deploy as volunteers
- Promote good practice and actively challenge practices and behaviour that could be deemed harmful to children, young people and adults at risk

## Core Principles of the Safeguarding Policy

The Policy is based upon the following fundamental principles:

- The welfare of the child and adults at risk is paramount
- The needs and views of children are the central consideration in all decision making
- All children and young people, regardless of gender, sexual orientation, age, parental status, disability, religion or belief, race, gender reassignment, ethnic or national origins, or socio/economic background have a right to be protected from abuse
- It is the responsibility of all involved in the delivery or planning of rugby for children to report any concern
- Everyone has the right to be treated as an individual
- All adults have a right to be safe and treated with dignity and respect, with a right to privacy
- There is a responsibility to safeguard children and adults at risk and working in partnership with relevant stakeholders (Police, Social Services, NSPCC, and other organisations and individuals) is key to meeting this responsibility
- It is the responsibility of safeguarding professionals to determine whether or not abuse has taken place, or if there is a perceived risk
- All incidents, allegations or concerns of poor practice or abuse should be taken seriously and responded to swiftly and appropriately
- All Clubs have a duty of care to all children and adults at risk

## Legislation and Government Guidance

There are a number of key pieces of legislation and government guidance that are relevant to the safeguarding policy and procedures, and if you require any additional information regarding these please contact the WRU Safeguarding Team.

### Promotion and distribution of the Policy

The Policy is available both in hard copy and electronically and will be circulated to all CSO's. If there are any new CSO's who are appointed by the club, they will be provided with a copy of the policy when they complete their induction training.

The Policy will be reviewed on a regular basis, and in light of:

- Developments and changes in relevant legislation and/or government guidance
- Developments as a result of work conducted by the National Strategic Group for Safeguarding Children in Sport
- Requirements of the Local Safeguarding Children Boards, NSPCC Child Protection in Sport Unit, Sport Wales
- Learning from serious case reviews

In addition, the WRU will review the effectiveness and implementation of the policy and procedures by:

- Monitoring compliance with the policy and procedures
- Providing reports to the Board on all matters relating to safeguarding
- Carrying out case reviews following the conclusion of any major child protection case within the sport
- Seeking advice from the Child Protection in Sport Unit as part of the investigative review process
- Reviewing the outcomes for the child in cases where the WRU has taken action
- Seeking the views of key stakeholders in the sport, including young people.



# **ROLES AND RESPONSIBILITIES**

## **ROLES AND RESPONSIBILITIES**

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

The WRU has a Safeguarding Team within the Rugby Operations Department, and this includes a Lead Officer for Safeguarding (Policy and Integrity Manager) who has strategic and operational responsibility in consultation with the WRU Board. The WRU also has a Safeguarding Manager who is responsible for delivering the operational response to any safeguarding concerns, implementing the WRU policy, and education.

The WRU will also ensure there is a nominated Club Safeguarding Officer for each club irrespective of whether that club provides under 18 rugby. There is a need for all clubs to understand the importance of having the necessary safeguards in place, with the Club Safeguarding Officer being a key role within rugby clubs, and central to driving this forward.

The WRU will develop and monitor an Action Plan that sets out how the WRU will work towards maintaining the requirements of the NSPCC National Safeguarding Standards for Safeguarding and Protecting Children in Sport, and work with Sport Wales and other organisations to ensure that similar standards are achieved in safeguarding Adults at Risk.

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

## The Welsh Rugby Union will:

Respect and promote the rights, wishes and feelings of children young people and adults at risk

- Support all member clubs to implement procedures which provide a duty of care for children and adults at risk safeguard their well-being and protect them from abuse
- Support all member clubs as the first point of contact for safeguarding matters by providing advice and guidance through the WRU Safeguarding Manager
- Design, create and develop safeguarding policies and procedures
- Lead the monitoring and review of the Safeguarding Policy and Action Plan
- Have an aligned approach to any safeguarding issues, through inter-departmental liaison and close links with the Disciplinary Department and Disciplinary Committee
- Offer regular training and support for its employees and volunteers to adopt best practice in safeguarding
- Provide training and support to all Club Safeguarding Officers
- Work with other sport's national governing bodies to develop best practice in safeguarding
- Work with the NSPCC and Child Protection in Sport Unit to continually develop policies and procedures
- Report information to other relevant organisations, e.g. NGBs, if the allegations concern a volunteer/coach in that sport
- Raise awareness of safeguarding in rugby and in other sport
- Co-ordinate and support clubs in the recruitment of suitable volunteers through the DBS process and Safeguarding Referral Group
- Ensure that there is a balanced and robust risk management process for volunteer recruitment
- Ensure that there is an effective volunteer recruitment process, and processes in place to conduct any investigations that are necessary and proportionate to the potential risk
- Ensure that decisions taken by the WRU Policy and Integrity Manager, Safeguarding Manager, and Safeguarding Referral Group are appropriately documented and are subject to scrutiny and appeal through the Case Management Panel
- Respond to all safeguarding allegations appropriately, implementing the appropriate safeguarding, disciplinary and appeal procedures and involve appropriate authorities where necessary
- Through the WRU Policy and Integrity Manager and Safeguarding Manager be the link for outside agencies, such as Social Services and Police
- Make referrals to other agencies if it is felt that there is a child in need or a child protection concern that should be subject of an investigation
- Make referrals to other agencies if it I felt that there is an adult at risk concern that should be subject of an investigation
- Co-operate and work with statutory agencies in respect of their responsibilities under the Multi Agency Public Protection Arrangements
- Attend Multi Agency Strategy meetings where appropriate
- Support external organisations with investigations
- Conduct internal safeguarding investigations if appropriate and consider referral to the Discipline Committee
- Investigate poor coaching practice issues
- Ensure that in the event of concerns arising about an employee or volunteer, the case management process and disciplinary processes are initiated as appropriate
- Issue safeguarding measures if there is believed to be a risk posed to children or adults at risk
- Ensure that all decisions taken in the Case Management process are appropriately documented
- Complete referrals for individuals who may pose a risk to children or adults at risk to DBS for consideration of inclusion on the 'Barred List'

## Club Safeguarding Policy and Governance:

- Formally sign up to the WRU Policy and Procedures or adopt a Club Policy that complies with WRU requirements
- Ensure that one of the Senior Management Committee Officials within the club has overall responsibility for safeguarding
- Appoint a Club Safeguarding Officer (CSO) to take responsibility for safeguarding matters within the club
- Ensure that the CSO has support from the Senior and Junior Committees at the club in promoting and ensuring adherence to the Safeguarding Policy
- Ensure that the CSO or a representative from the Mini and Junior Committee attends Senior Committee meetings and is briefed on safeguarding matters within the club
- Ensure that there is a flow and exchange of information between the Senior and Mini and Junior Committees regarding any safeguarding matters
- Ensure that there are accurate and reliable records of all volunteers who are involved in under 18 rugby retained on the Club Audit database
- Ensure that there are accurate and reliable records of all volunteers who are involved in volunteering with adults at risk on the Club Audit database
- Ensure that there is accurate and reliable information retained in terms of safeguarding compliance i.e. valid DBS certificates etc.
- Ensure all staff and volunteers who are working directly or indirectly with children or adults at risk receive appropriate training and have access to advice on safeguarding
- Ensure the club complies with the volunteer recruitment risk management processes for all new volunteers who should not have unsupervised contact with children or adults at risk until the appropriate risk assessment has been completed
- Ensure that current volunteers working with children or adults at risk comply with their ongoing responsibility to self-disclose any new or recent convictions and have a valid DBS certificate
- Ensure that any concerns about poor practice by existing staff and volunteers are referred to the WRU Safeguarding Team
- Ensure that they support the WRU in safeguarding investigations
- Engage with young people and their parents/carers to encourage them to feel able to raise concerns, and support them to understand how they can contribute to safeguarding
- Engage with adults at risk and their carers or guardians to encourage them to feel able to raise concerns, and support them to understand how they can contribute to safeguarding

# **PARTNERSHIPS**

## PARTNERSHIPS

### NSPCC

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

The Child Protection in Sport Unit (CPSU)

The CPSU is a partnership between the NSPCC, Sport England, Sport Northern Ireland and Sport Wales. The Unit was founded in 2001 to work with UK Sports Councils, National Governing Bodies (NGBs), County Sports Partnerships (CSPs) and other organisations. This followed a series of high profile cases of abuse of young athletes by those in positions of trust such as coaches in the sports.

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

This includes :

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

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

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

The CPSU help organisations to:

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

The CPSU assist sports in Wales by providing a framework for safeguarding and protecting children and young people, which incorporates:

- Standards
- Support
- Progress and Evaluation

The framework consists of five standards that a sports organisation should demonstrate it undertakes at all levels of its sport. In order to meet the framework, organisations will identify actions for implementation. Each of these actions will be promoted and supported through effective communication and safeguarding training opportunities that will benefit the organisation.

The standards measure the response of organisations in the following areas of safeguarding

1. Policy
  2. Procedures
  3. Practices
  4. Education and training
  5. Implementing and monitoring Principles
- Children and young people have a right to enjoy sport, free from all forms of abuse and exploitation
  - Everybody has a responsibility to support the care and protection of children and young people
  - Sporting organisations have a duty of care to children and young people who take part in sport

This framework has been developed in order to help safeguard and protect children and young people in sport. It is based on current good practice and is informed by legislation, guidance, and evidence from research, drawing from the fields of safeguarding and sport.

The groups of people who will benefit from the framework are:

- Children and young people
- Parents and carers
- Those working in sport
- The organisations themselves

The framework sets out a national benchmark of good practice to work towards. It will raise awareness and help organisations to identify what they need to do to protect children and to minimise avoidable risks. When implemented fully, the framework should provide parents with increased confidence and peace of mind. Most important of all, it should help to create safer environments for children, where they can get the very best from their involvement in sport in Wales.

## Purpose of the standards

- To help create a safe sporting environment for children and young people and protect them from harm
- To provide a benchmark to assist those involved in sport to make informed decisions
- To promote good practice, and challenge practice that is harmful to children.
- To provide clarity for all those involved in sport in recognising and responding to concerns

The CPSU website is a valuable source of information and advice - [www.thecpsu.org.uk](http://www.thecpsu.org.uk)

## The Ann Craft Trust (ACT)

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

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

<https://bit.ly/2PrIW9Y>

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

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

They can be contacted directly on **0115 951 5400** or [ann-craft-trust@nottingham.ac.uk](mailto:ann-craft-trust@nottingham.ac.uk)

For those keen to learn more, sign up to the free Ann Craft Trust newsletter where you will find lots of interesting articles and updates on recent developments. <https://bit.ly/2G8si7k>



## Disclosure and Barring Service (DBS)

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

The DBS are responsible for:

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

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

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

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

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

DBS also work with:

- The Department for Education who own the safeguarding policy for children
- The Department of Health who own the safeguarding policy for vulnerable groups
- Capita – A private sector partner that operates an administration infrastructure and call centre for the Disclosure and Barring Service
- Registered bodies - organisations that have registered with the DBS checking service, and are the primary point of contact for:
  - Checking disclosure applications and validating information provided by the applicant
  - Establishing the identity of the applicant
  - Submitting fully completed application forms
  - Countersigning application forms to confirm entitlement

## The DBS Process

The DBS issue criminal record certificates for specific positions, professions, employment, offices, works and licences included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

Individuals and the self-employed cannot apply for a check directly to the DBS. A DBS check will be requested as part of an organisation's pre-recruitment checks following an offer of employment, including volunteering roles and applications for specific licences.

Before an organisation considers asking a person to make an application for a DBS check, they have a legal responsibility for ensuring that they are entitled to submit a check for the job role. The WRU comply with the criteria of regulated activity when processing applications for DBS checks.

When the application is processed and sent to the DBS they search police records and, in relevant cases, barred list information, and then issue a DBS certificate to the applicant.

We recognise that information released on DBS certificates can be extremely sensitive and personal. Therefore a code of practice for recipients of criminal record information has been developed to ensure that any information they get is handled fairly and used properly.

A list of guidance documents about the DBS checking service is available on the DBS website.

## DBS Referrals

Referrals are made to DBS when an employer or organisation, e.g. a regulatory body, has concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children or adults at risk.

In these circumstances the employer must make a referral to the DBS, though this is not obligatory for regulatory bodies.

A list of guidance documents about DBS referrals is available on their website.

## Sport Wales

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

Being the main advisor on sporting matters to the Welsh Government, they are responsible for distributing National Lottery funds and Welsh Government funds to both elite and grassroots sport in Wales.

The sector's vision for Sport in Wales (2018) is "A nation where everyone has a lifelong enjoyment of Sport"

<https://www.visionforsport.wales/>

Sport Wales' role is to bring partners and people together; local authorities, governing bodies of sport, communities, coaches, adults, young people, children and the entire nation whether it be through Participating, Supporting, Delivering or Excelling in sport.

# **STAFF RECRUITMENT**

## **SAFE RECRUITMENT OF WRU GROUP STAFF TO WORK WITH CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK**

The WRU Group are committed to ensuring that there are safe recruitment and selection procedures in place for the protection of all children, young people and adults at risk participating in all rugby related activities, reflecting statutory responsibilities, government guidance and complies with best practice. These safeguarding measures are just one of many provisions in place to protect people from physical, sexual and emotional harm, and neglect

The WRU Group is committed to applying a robust recruitment and selection process to recruit employees and volunteers who share the WRU Group values, beliefs and approach to safeguarding.

These procedures apply to all paid and unpaid roles, and those that involve regular contact with children, young people, and adults at risk. These procedures will apply regardless of the number of applicants for a post.

### **Safeguarding Vetting Checks for WRU Staff**

All roles will have a job description that describes the range of duties the role will involve, and the skills and competencies required. All job descriptions for roles which involve regulated activity (regular unsupervised contact with children) will state a requirement for an enhanced Disclosure and Barring Service vetting check to assist in making decisions about their suitability to work with children. This is classed as an 'essential' selection criteria.

All roles will be reviewed on an annual basis jointly by the Human Resources Manager and the Policy and Integrity Manager, to establish if the role requires an enhanced DBS check.

Where a DBS check is required, the WRU Group encourages applicants to provide details of their criminal record at an appropriate stage in the application process and before a disclosure is undertaken. The WRU Group will request that this information is volunteered by the applicant and is sent under a separate, confidential cover to the Human

Resources Department within the WRU Group. This information will be treated as strictly confidential and only seen by those authorised personnel as part of the recruitment process, in order to assess whether the criminal record details are relevant to the role applied and to inform the overall final assessment.

DBS disclosure clearance is mandatory for any employee, worker or volunteer whose role with The WRU Group requires involvement in regulated activity with children or adults at risk prior to commencing their role.

## Staff Induction Process

All new WRU Group employees will be required to complete an induction process to familiarise themselves with the organisation's policies and procedures and the inclusive of safeguarding. The induction process will include a briefing on their responsibilities as a WRU employee, where they will be required to sign an agreement to disclose any relevant information if they were charged or prosecuted with any criminal offences, or subject of a disciplinary investigation, such as breach of the anti-doping rules, disciplinary regulations, code of conduct, or staff disciplinary.

WRU Staff whose roles involve regulated activity (regular unsupervised contact with children) will be required to undertake an enhanced DBS check on a three year cycle. However if an employee is charged, prosecuted or subject to any of the disciplinary processes, at any time during their employment then they must verbally notify HR and the Integrity Team of this at the earliest opportunity.

Following notification, they are they are formally required to record this on a self disclosure form, which are available from HR or the Integrity Team. The self disclosure form must be submitted within three days of the initial disclosure to the Integrity Team via the dedicated integrity e-mail address. This will be treated as a confidential matter, and only disclosed to others on a need to know basis.

The WRU are committed to ensuring that there is not only a safe and positive environment in our clubs, but also in a work setting. The WRU believe that it's important to empower, and trust our staff, aligned to our values. However we also need to ensure that the reputation of the organisation is protected, and disciplinary matters are dealt with sensitively but effectively. Therefore any failure to disclose such information would result in a disciplinary investigation being conducted. These are essential safeguards that need to be in place to ensure that the WRU is a safe and positive environment to work in.

## Responsibilities

The WRU Group is committed to preventing discrimination and other unfair treatment against any of its employees, prospective employees, volunteers, stakeholders or users of its services or facilities regardless of race, gender, religion or belief, sexual orientation, gender reassignment, responsibilities for dependants, age, disability or criminal convictions which do not create a risk to children, young people and adults at risk.

The WRU Group will ensure that any criminal record information provided is kept confidential and according to the requirements of the Data Protection Act 1998 and, where appropriate, DBS Code of Practice.

### Recruitment of People with a Criminal Background

The Rehabilitation of Offenders Act (ROA) 1974 allows people to have the right to be treated as though they had never committed an offence after a certain period of time. Convictions, cautions, reprimands and final warnings become spent after a specified period of time known as the rehabilitation period.

Safeguarding children and adults at risk is of paramount concern when making decisions about the suitability of applicants, and some of the roles within the WRU are exempt from the ROA such as coaching children or vulnerable groups.

Having a criminal record will not necessarily prevent someone from working for The WRU Group. This will depend on the nature of the position and the circumstances and background of the offences. These issues will be considered by the Safeguarding Team, and may be referred to the Safeguarding Referral Group for consideration.

## **Completing a DBS Disclosure Application**

The applicant should liaise with the HR Department, and the Safeguarding Team to complete the DBS application process online.

The DBS application can be completed by one of the WRU's DBS Identification (ID) Verifiers. The list of current ID Verifiers employed by the WRU is held by the Safeguarding Team in the Rugby Operations Department, and HR Department. The ID Verifier has to complete the ID verification, check the accuracy of the information provided, and then process the DBS application online.

The DBS disclosure is only sent to the applicant, however once the application is processed and the DBS disclosure dispatched, an e-mail will be sent to the WRU Safeguarding Team to confirm if the disclosure has been cleared or needs further investigation due to information held on the disclosure i.e. previous convictions or intelligence.

If there is information on the DBS disclosure that requires further investigation, the subject will be required to provide the certificate for examination to the Safeguarding Manager, who will then conduct an initial risk assessment, and take appropriate action to further investigate if required.

## **Data Protection (Security and Retention of Information)**

Information regarding DBS checks will not be kept on an employee's personal file. The DBS certificates relating to these applications are not retained once the risk assessment has been completed.

However, in relation to any cases that are referred to HR or the Safeguarding Referral Group, the details and information relating to any decisions made will be retained in a secure network drive and kept for as long as necessary. Where possible and in line with other legislation, this will be in line with the WRU Group Privacy Policy and data protection laws. Access will be limited to the WRU Safeguarding Team and nominated employees.

## **Continuous Professional Development (CPD)**

The WRU Group recognise that providing a system of checks is only part of the process of safeguarding people. The WRU are committed to the provision of safeguarding training for staff. The WRU recognise the importance of embedding good safeguarding practice throughout the organisation, and training is one of the key components in this. HR and the Rugby Operations Team will provide access to relevant safeguarding training.

# **VOLUNTEER RECRUITMENT**

## **SAFE RECRUITMENT OF WELSH RUGBY UNION VOLUNTEER WORKFORCE**

The WRU Group are committed to ensuring that all volunteers who are involved with children, young people and adults at risk in a rugby related environment promote positive values and beliefs, and foster and encourage people to enjoy their experience in Rugby Union. Volunteers and particularly coaches should be helpful and encouraging as positive role models and ensure that they embrace the values of the game and the Welsh Rugby Union.

Children have the right to have a flying start to life and Rugby Union is a great vehicle to assist in achieving that aim. There is a need for volunteers to create a safe and positive environment where children can thrive and develop, and enjoy the rugby experience.

The WRU are also committed to ensuring that adults at risk have the opportunity to become involved in rugby in a variety of capacities, and inclusion is a key part of the WRU vision of getting more people involved in rugby in Wales, more often, with more enjoyment and more success.

To ensure that the right people are recruited as volunteers in these important roles, any volunteers who wish to participate in rugby related activity, which involves unsupervised contact with children or working with adults at risk will be subject to a suitability risk assessment through Disclosure and Barring Service enhanced checks.

The Club Safeguarding Officer is a key role within all rugby clubs across Wales. The WRU are committed to supporting CSOs and developing their skills and abilities as part of the WRU Safeguarding Team.

### **Regulated Activity – Working with Children**

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

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

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

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

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



## Regulated Activity – Working with Adults at Risk

The definition of 'regulated activity' (adults) as defined by the Safeguarding Vulnerable Groups Act 2006 from 10th September 2012

Regulated activity for adults does not include activities which would ordinarily be associated with sport (i.e. coaching is not regulated activity for adults at risk) with the exception of conveying an adult at risk.

For more detail and practical examples of these please see the following link

<https://bit.ly/2ZNMwvl>

## WRU Database

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

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

You can register any player online from Under 6 to Youth by visiting the website (players have to be 6 years of age to be registered). Please see the below link where parents can register a player under 18 years of age.

<https://www.mywru.co.uk>

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

It is the responsibility of the Rugby Operations Team to update the information relating to the DBS certificate and this will be completed once the full suitability risk assessment has been completed and the disclosure has been cleared.

The Welsh Rugby Union will monitor the DBS compliance of clubs by utilising the information contained on the safeguarding tab of the database.

## Volunteer Recruitment

The Welsh Rugby Union have a risk management process that considers the suitability of volunteers through appropriate vetting procedures, based on information gathered from a number of sources, including the Disclosure and Barring Service. The WRU operate an online DBS application process which is managed at club level by CSO's who are responsible for processing applications.

Our rugby clubs rely heavily on motivated and enthusiastic volunteers to work with children and adults at risk in rugby, and without them our clubs could not function. However some individuals will try to use rugby clubs and events to gain access to children for inappropriate motives. There is a need to ensure that there is a robust, safe and practical approach to volunteer recruitment.

The Welsh Rugby Union actively encourage volunteers to participate in rugby, in whatever capacity they wish. However this needs to be balanced alongside the need to ensure that we have appropriate volunteer recruitment processes in place to provide a safe and positive environment for the next generation of players.

In Welsh rugby we have a large volunteer workforce, and we need to be pragmatic in our approach to safeguarding without compromising the safety of people involved in the sport. The welfare of the child or any Adult at Risk is the paramount consideration and if there is any suggestion of risk, then the matter should be referred to the WRU

Safeguarding Co-ordinator or a member of the Safeguarding Team.

If there are coaches who are under 18 years of age, although they may be suitably qualified and vetted, they should not be relied upon to have responsibility for safeguarding issues. They should be allowed to develop their sense of belonging and responsibility rather than depending upon them to take full responsibility for managing a group of children. They can only supplement the adult coaches supervising the activity.

## Volunteer DBS Checks

It is extremely important that volunteers complete a DBS application prior to or as soon as possible after being appointed in a position of regulated activity at a rugby club. If the new volunteer can complete the DBS process and have a cleared certificate prior to starting coaching or volunteering with unsupervised contact, then that is best practice.

DBS checks for volunteers are free, with no cost to the club or the volunteer.

Anyone attending the Coach Development Courses will also be required to have a valid DBS certificate, prior to attending.

Roles which require DBS Checks include:

- Team Managers
- Coaches
- First Aiders
- Referees

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

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

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

The process that has been adopted as a minimum requirement is as follows. If there is a person who wants to participate as a new volunteer and they haven't had a DBS check then they shouldn't be prevented from volunteering. However, there is a need to ensure that we have the appropriate safeguards in place, for children and adults at risk to enjoy the rugby experience. For this reason, in the intervening period between the application being completed, processed and cleared as a disclosure, the volunteer cannot have unsupervised access to children or adults at risk.

In order to have appropriate safeguards in place, the volunteer must be supervised until the DBS certificate has been cleared and the CSO has been notified. It is the responsibility of the club to ensure this supervision takes place and it can take a number of forms:

1. The coach can be supervised by another Coach or Team Manager, Team Representative or Parent who has a cleared DBS disclosure certificate.
2. If there is no one involved with the team who can provide such supervision, the second option is that the coach can conduct training sessions in the presence of parents or guardians, who are able to supervise those activities.

In a game situation or pre or post game, it is recommended that if a Coach is not DBS checked then they should be supervised again by someone already checked, or by a number of parents. An example of this would be entering changing rooms, or transporting children.

We will not compromise the safety of our children, and volunteers must understand that coaching or volunteering whilst being supervised is only a temporary measure and the DBS check should be completed ASAP.

If a volunteer fails to engage with the club and WRU Safeguarding Team in completing this process, then this must be challenged by the Club. The CSO needs to establish the reason why they won't engage and if there are concerns, as outlined earlier you should contact the WRU Safeguarding Team. This issue will then be discussed and either the WRU will consider if it is proportionate and necessary to impose an interim suspension on that volunteer.

This would prevent them from coaching or volunteering with children or adults at risk until the matter is resolved, however this is only imposed as a temporary safeguarding measure. Clubs can also take their own disciplinary action if they feel that there is a safeguarding concern, but should report all incidents to the WRU.

The role of the Club Safeguarding Officer is critical in managing this process, and there must be clear lines of communication between the CSO, the Club Management Committee and the WRU Safeguarding Team.



## Volunteer and Club DBS Application Process

The Team Manager, Coach or Club Coaching and Refereeing Co-ordinator should notify the CSO that there is a new coach in the club and the CSO will facilitate the completion of the DBS application. It is important that this is completed as soon as possible. DBS checks are free for volunteers, and are completed online.

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

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

The identity of the volunteer can be verified by using various personal documents such as drivers licence, passport and utility bill etc. (see page 47).

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

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

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

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

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

Once the risk assessment is completed and the disclosure is cleared, the WRU will update the DBS certificate number and date of issue onto the safeguarding tab of the club audit to reflect DBS compliance for that volunteer. The CSO will then be notified of this by e-mail. Only once the CSO has been informed of this clearance can the volunteer be granted unsupervised contact with children within the club.

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

It is the responsibility of the club to ensure that all volunteers actively involved as Coaches, Team Managers, First Aiders and Referees are included in the club audit, so that the DBS certificate details can be updated by the WRU Safeguarding Team.

## **Full Risk Assessment Process (Convictions on the DBS Disclosure)**

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

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

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

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

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

There are two potential outcomes to this process, either the disclosure will be cleared and the volunteer can continue to have regulated involvement and also have unsupervised contact with children or adults at risk, or the SRG will impose a suspension as a safeguarding measure until such time that an assessment is made that indicates that the person does not pose a risk.

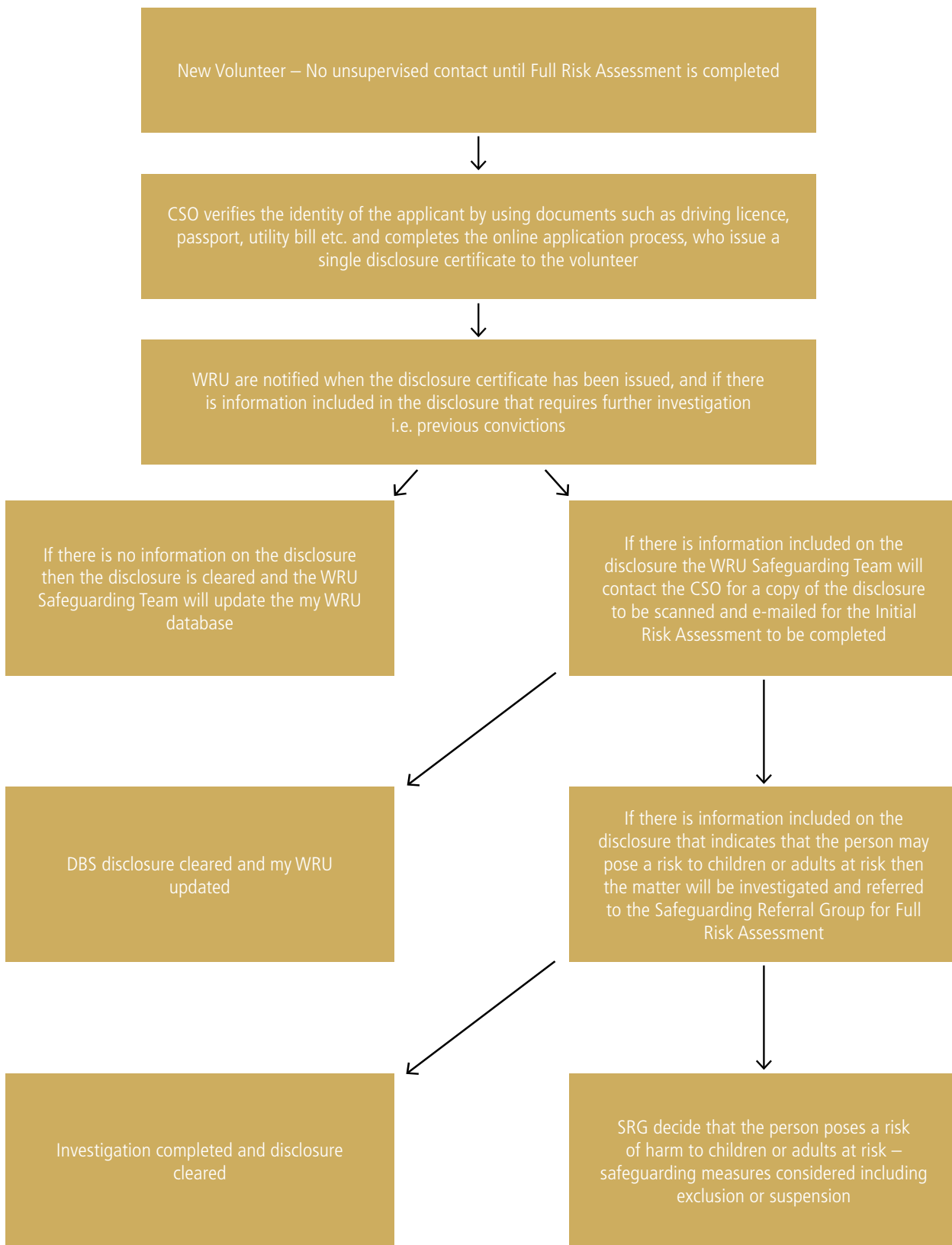
(See Flow Chart on page 46)

### Frequency of DBS Checks

DBS certificates should be renewed every three years, however if any volunteers are convicted of any criminal offences during that time whilst still involved in regulated activity they have a duty to disclose this information to the CSO and the WRU Safeguarding Manager for a further risk assessment to be conducted.

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

# VOLUNTEER RECRUITMENT RISK MANAGEMENT FLOWCHART



## Identification Requirements for DBS Check

You will need to submit a minimum of three documents from the lists and routes below

### Route 1

Three documents must be produced

One document from Group 1 plus two from Group 1 or 2 (see below). One of which must confirm your current address

Three documents must be produced

### Route 2

One document from Group 2a and two documents from 2a or 2b (see below)

AND complete an external validation check

## Group 1 Documents – Primary Trusted Credentials

### Current valid Passport:

UK or EEA (or non-EEA in combination with a Biometric

Residence Permit or current Work Permit/Visa)

### Biometric Residence Permit (UK):

### Current Driving Licence (UK):

(Full or provisional) Isle of Man/Channel Isles;

A photo card is only valid if the individual presents it with the associated counterpart licence; except Jersey

### Birth Certificate:

(UK and Channel Isles) – issued within 12 months of date of birth;

Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces

## Group 2a – Trusted Government/State Issued Documents

### Current valid Passport:

(UK, EEA or non-EEA)

### Current UK Driving licence:

(Photo card or old style paper version)

### Birth Certificate:

(UK and Channel Isles) – issued within 12 months of date of birth

### Certified copy of Birth Certificate:

(UK and Channel Isles) – issued after 12 months of date of birth

### Biometric Residence Permit (UK) Marriage/Civil Partnership Certificate (UK)

### Adoption Certificate (UK:)

### HM Forces ID Card (UK)

### Fire Arms Licence (UK)

## Group 2b – Financial/Social History Documents

- **Utility Bill (UK)\*** – Not Mobile Telephone
- **Mortgage Statement (UK)\*\***
- **Credit Card Statement (UK)\***
- **Bank/Building Society Statement (UK)\***
- **Financial Statement\*\*** – e.g. pension, endowment, ISA (UK)
- **P45/P60 Statement \*\***(UK & Channel Isles)
- **Council Tax Statement** (UK & Channel Isles)\*\*
- **Letter from Headteacher** (16-19 year olds only)
- **Benefit Statement\*** - e.g. Child Allowance, Pension
- **Cards carrying the PASS accreditation logo (UK)**
- **Work Permit/Visa (UK) (UK Residence Permit)\*\***
- **EU National ID Card**
- **A document from Central/Local Government/**
- **Government Agency/Local Authority giving entitlement (UK & Channel Isles)\*** – e.g. from the Department for Work and Pensions, the Employment Service, Customs & Revenue, Job Centre, Job Centre Plus, Social Security

### Please note:

- If a document in the List of Valid Identity Documents is:
- Denoted with \* - it should be less than three months old, denoted with \*\* - it should be issued within the past 12 months, not denoted – it can be more than 12 months old.
- Non-EEA nationals or EEA nationals who have lived in the UK for less than 5 years must complete check via group 1.

## Route 3

This route is a final resort; please contact the WRU Safeguarding Team if you or the organisation that asked you to complete a check cannot satisfy route 1 or route 2.

If you fail the external validation check or cannot produce documents for either route, they will need to go for fingerprinting; this may delay the application process.



**PROMOTING  
A POSITIVE  
ENVIRONMENT**

## PROMOTING A POSITIVE ENVIRONMENT AND CULTURE - PASS IT ON

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

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

When children, young people and adults at risk are able to participate in rugby within a safe, developmentally appropriate, positive, and supportive environment they have an opportunity to develop a range of life skills. These skills then help them to positively contribute to society in the future, develop a love of the sport whilst also improving their physical well-being by engaging in a healthy active lifestyle. They will also have the opportunity to develop their sporting potential.

There is a responsibility for everyone involved in the game to ensure that respect, and discipline remain a central theme in providing people with the opportunity to enjoy rugby both on and off the field. It is important that our volunteers and other people involved in the game understand the importance of creating and contributing to a positive rugby culture, and treat all people with respect so that everyone enjoys the 'Welsh Rugby Experience'.



## Working with Parents to Optimise their Involvement and Create a Positive Environment

Parents play a vital role in providing children with opportunities to participate in rugby and supporting their ongoing participation. Through their positive involvement, parents can enhance children's self-confidence, motivation, enjoyment, and long-term engagement in rugby, as well as helping them benefit from the range of life skills that can be taught through rugby. Thus, working with parents to help optimise their involvement in their child's rugby life is very important.

Optimal parental involvement may be demonstrated by:

- Giving children the chance to play rugby and choosing developmentally appropriate opportunities at each stage of their rugby journey
- Providing the necessary practical, logistical, and informational support to help their child progress in rugby (e.g., transporting them to training, providing kit and refreshments)
- Using appropriate verbal and non-verbal communication to encourage and emotionally support their child at training and during matches
- Parents talking to their children about what behaviours they want to see on the sidelines and then aligning their involvement with their child's preferences
- Maintaining control of their own emotions during matches and training and in response to on- and off-pitch decisions (e.g., team selections, fouls, calls etc.)
- Respecting the etiquette of rugby by accepting coaches and referees decisions, supporting their child's teammates and opponents, and encouraging children play within the rules and values of the sport
- Developing healthy and open relationships with others involved in their child's rugby life (e.g., other parents and children, coaches, volunteers)
- Volunteering time to help out with club activities, running events, fundraising, and coaching
- Demonstrating an understanding of their child's rugby experience and the role rugby plays within their life
- Recognising the progression in rugby is process that occurs over a long-period of time and each child will progress and develop in different ways and at different rates



There is a considerable amount of research that has focused on what children really like from their parents to help them in sport. Children have shared ideas such as:

*“Like before a game, if I’m just like nervous, just like cheer for me and say something positive so I relax.”*

*“That [coaching] can be bad ‘cause if it’s your dad you try to do what he tells you to do but your coach tells you something different and you don’t know what to do.”*

*“She’s [mum] not just clapping for me, she’s clapping for the whole team. That’s what I like.”*

*“I think like cheering and stuff’s OK and if you’re into it like you can like say, ‘That was a foul,’ but you have to like drop it there. You can’t, you shouldn’t be arguing with the ref.”*

*Parents are viewed positively when, “They’re always supportive they don’t really care if we win or lose just that we try our best.”*

*It’s really nice if you’ve come out after a game and somebody that like somebody else’s parent comes up to you and said ‘Oh you had a really good game,’ like that always is really, really nice.”*

*“Sometimes parents, they get a little like rowdy and they’re like, yell at you and they’ll say ‘No don’t do that, don’t do this or something.’ Just be more encouraging and positive about it.”*

*“I don’t mind if my parents yell at me [after a match] because I didn’t try. But what I don’t like is [if] parents would yell at you but you tried and just didn’t play well, you know.”*

*“Probably cheering you on, that’s the thing I like the most... like I like them to say good job, keep going, that’s awesome and stuff.”*



Coaches, volunteers, and CSO's can help parents to enhance their involvement in their child's rugby life in numerous ways, including:

- Encouraging parents to reflect on why they want their children to play rugby and ensuring this matches with children's desires
- Giving parents and children time to talk about the types of behaviours they do and do not like on the sidelines and helping parents to engage in the ways children prefer
- Teaching parents strategies to manage the emotions they might feel when watching their child compete
- Encouraging parents to foster independence in their children while holding them accountable for their on-pitch behaviours
- Providing opportunities for parents and coaches to get to know each other and develop strong relationships
- Helping parents to keep rugby in perspective by reducing the emphasis on results and emphasising the long-term process of development
- Providing parents with pertinent information about rugby (e.g., rules, development pathways etc.) so that they understand their child's experience
- Highlighting the multiple benefits that children can gain through their rugby participation
- Creating a rugby environment that is inclusive, welcoming, and enjoyable for parents and families
- Providing parents with regular updates on their child's progress in an open and honest relationship

Supporting children involved in any sport can be challenging for parents due to the time, financial, and emotional commitment they make to enable children to attend training and matches. For instance, research has shown that parents experience a range of stresses that they must cope with when their children are involved in sport, such as:

- Competitive stresses such as watching their child compete, observing their child being disappointed, perceiving unfair or unjust on-pitch decisions, and seeing their child get injured.
- Organisational stresses including financing their child's involvement, transporting children to training and matches, managing family logistics, and managing injuries.
- Developmental stresses regarding their child's rugby development, balancing school, social, and sport commitment, educational commitments and achievements.

Within rugby, concerns about injury are often in the forefront of parents minds and as a result watching their child compete can be particularly hard.

Given these challenges, it is really important that clubs engage with the parents of all players, but particularly new players, as both the parents and child may be experiencing the rugby environment for the first time. By engaging with parents, providing them with opportunities to learn about the sport, helping them to develop a support network with other parents within the club, and facilitating positive relationships between parents and coaches, you can help to minimise some of the challenges parents face.

Additionally, by ensuring your club is providing developmentally appropriate, process (rather than outcome) focused safe environments, parents will have fewer concerns about their child's experience. When parents encounter fewer challenges and have less concerns about their child's rugby experience they will be able to enjoy it more and be involved more appropriately, which will have positive consequences for children, coaches, referees, volunteers, and parents themselves.

## Positive behaviour by children, young people and adults at risk

It is also important that children, young people and adults at risk display positive behaviour, and treat others with the same respect and fairness that they would like to be shown themselves.

This can be displayed through -

- Respecting differences in gender, disability, culture, race, ethnicity and religious belief
- Challenging discrimination and prejudice
- Appreciating that all participants bring something valuable and different to the sessions
- Considering their own welfare and the welfare of others
- Not engaging in any irresponsible or illegal behaviour
- Challenging behaviour that falls below the expected standards of the session
- Speaking out if they are concerned about anything or feel uncomfortable about their own needs and those of others
- Taking time to thank those who help with the activity.

### 'Let us Play'

The WRU have produced a video entitled 'Let us Play' which features players from all elements of the game, from grassroots to international rugby. Sam Warburton, Dan Biggar, Alun Wyn Jones and ex Wales Women captain Rachel Taylor are amongst those ambassadors, who, alongside young people and community rugby players, explain how they fell in love with the game, any negative aspects and how they would like to improve those areas.

<https://bit.ly/1F996SF>

### 'Pass it On'

The WRU are committed to working with coaches, parents and all volunteers to ensure that the values of rugby are promoted. The 'Pass it On' initiative has been developed to assist all those involved in clubs to create and sustain a positive club environment.

The WRU have developed a set of interactive workshops that clubs can access to deliver to coaches and parents. The focus is on raising awareness of the importance of respect, appropriate touchline behaviour, respecting Match Officials, other Coaches and Volunteers, and promoting and celebrating the values of the game.

If you need more information please see the link for the WRU Game Locker:

<https://www.wrugamelocker.wales/>



## Practical Guidance to Create a Safe and Positive Environment in your Rugby Club

There are a number of clubs who promote positive behaviour through a number of different outlets. These range from positive comments on social media, to the use of 'Respect Boards' and some have also posted their Codes of Conduct not only on notice boards, but also on permanent boards outside their club or changing rooms.

It's a position of trust and responsibility, and can heavily influence the thinking and behaviour of the children they coach.

There are Codes of Conduct for Players, Parents, Spectators and Coaches and these should be placed in a prominent place so that all volunteers and visitors are able to view them, and understand the expectations in terms of behaviour, of everyone at the club (see appendices)

Referees and Officials play an integral part of every game of rugby played, ranging from the international stage to community and age grade spheres. They have a pivotal role in ensuring that Wales' national sport, and arguably chief love continues to thrive week in, week out. There is a need for all adults to understand that we must promote positive behaviour towards Match Officials, and set good examples for children to follow.

The following are practical examples that can be utilised to create an inclusive, safe and positive environment in your rugby club:

### Be a Positive Role Model

Coaches, Team Managers and Club Officials are all in a position of responsibility, and should aspire to be positive role models, and provide open and transparent leadership. These are key roles where positive behaviours should be exhibited, and these should be aligned to the behaviours described in the Codes of Conduct. This will have a direct influence on how the culture grows not only within teams but the wider club.

### Adopt an Inclusive Whole Club Approach

The club should be completely aligned from senior to mini and junior rugby, in terms of standard of behaviour, discipline, and compliance with the Codes of Conduct. Clubs should promote different formats of the game and provide inclusive rugby opportunities. The Senior Management Committee are ultimately responsible for safeguarding issues, and they should work closely with representatives from all teams and in particular the Club Safeguarding Officer.

### Promote and Publicise Positive Behaviour and Expectations

Clubs should consider promoting positive behaviour through the use of the Codes of Conduct and 'Respect Boards' which should be publicised in prominent places, such as club notice boards, and also at the ground, and through club values of our game.

## Rugby Club Registration and Welcome Events

Clubs should consider planning and delivering club induction events at the beginning of the season or at key times in the season. This could be used for registration or administration purposes, and also as an 'icebreaker' or social event for children and parents to meet with existing volunteers. It could be part of a 'try out' to encourage increased participation, and an opportunity for the club to brief their volunteers on what is expected in terms of standards, codes of conduct and appropriate behaviour.

## Internal Reporting Procedures

Clubs should have an internal reporting policy and disciplinary procedures to deal with issues of poor or unacceptable behaviour. The CSO should be the point of contact for reports of poor or unacceptable behaviour, and they should liaise with the Senior Club Secretary and the WRU Safeguarding Manager to consider a proportionate response to deal with these issues.

## Club Monitoring and Support Mechanisms

There should be increased monitoring of individuals or groups identified as presenting a problem in terms of their behaviour within the club. It is important that negative behaviour traits are not allowed to develop and grow within the rugby club environment without being challenged.

It is also important that the action taken or sanctions imposed do not impact upon the ability of children and young people to continue to participate in Rugby Union. There should be support mechanisms in place for adults or children who raise such concerns.





## Coach and Referee Development

Coaching is a powerful catalyst for promoting positive behaviour within Welsh Rugby.

Coaches come from a variety of backgrounds and possess a range of qualities and experiences from which they develop their coaching skills and unique coaching styles.

Coaches then adapt these qualities to the specific needs of the performers with whom they work.

Yet, in spite of such individual approaches to coaching, it is possible to identify certain skills and attributes that underpin effective coaching.

### Leadership

It is a coaches responsibility to develop and lead an optimal culture that services the needs of the players and team in relation to their performance goals

### People

Working with and for people is central to the effectiveness of a coach in the modern game. Building and maintaining relationships with all stakeholders forms the core of daily activities

### Self-Concept

Awareness of their actions, and their impact, their motives, and their feelings and those of others

### Coaching Craft

The role of a coach is to make the complex simple through applying a range of tactics to assist in the development of optimal performance

For example, all coaches need to:

- Communicate effectively with performers to ascertain their needs and ambitions, relay information and provide constructive feedback
- Plan and organise sessions and programmes to meet players needs and guide their development
- Analyse and evaluate performance (their own and that of their players) to gauge and direct progress
- Create a safe environment in which the well-being of the players is paramount
- Be open-minded in developing their coaching skills and knowledge. This is perhaps the most important attribute of good coaches: the ability and willingness to evaluate their own skills and knowledge, and constantly work to develop and improve them.

Coaches must aspire to be positive role models whose goal is to maximise the potential abilities of the people they coach. Any volunteers who wish to coach at any level within Welsh rugby should look to develop and enhance their skills through continuous professional development. Coach education is the foundation of this with the aim of developing the skills and abilities of coaches across Wales.

The strategic objectives of WRU Coach Development are to:

- Reduce the number of non-qualified coaches in the game
- Improve the quality of coach provision at junior, youth and senior rugby levels
- Increase the level of support for practising coaches
- Enhance the coaching of young players within the WRU pathway

Coaches should strive to understand the role of a children's coach, the principles of coaching children and the need to develop the whole child.

It's important for coaches of disabled or mixed ability teams to have a basic understanding of the needs of participants, and ensure that adults at risk are engaged and provided with opportunities to participate in rugby activities, and be part of the rugby community. Coach development and safeguarding are intrinsically linked in developing the whole person. The WRU are committed to providing a safe and positive environment for participants to develop their rugby skills in line with the values and beliefs of the organisation by embracing integrity, excellence, success, courage, family and humour, and both coach development and safeguarding are key components in achieving this.



## The Well-being of Future Generations Act

The Well-being of Future Generations (Wales) Act 2015, makes public bodies listed in the Act think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. The Act identifies seven well-being goals:



**A Prosperous Wales**



**A Resilient Wales**



**A More Equal Wales**



**A Healthier Wales**



**A Wales of Cohesive Communities**



**A Wales of Vibrant Culture & Welsh Language**



**A Globally Responsible Wales**

The Well-being of Future Generations (Wales) Act 2015, makes public bodies listed in the Act think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. The Act identifies seven well-being goals:

To achieve the well-being goals, the Act advocates 'Five Ways of Working':

- **Long-term:** This policy will help to ensure that children and adults at risk have a right to participate in a safe and positive environment.
- **Integration:** The well-being objectives of this Strategy align with those of many public bodies.
- **Involvement:** The Strategy involves many organisations who have an expertise and/or interest in this area.
- **Collaboration:** Working collaboratively with a range of partners and stakeholders is at the heart of this policy.
- **Prevention:** This Policy will help to engage and support individuals in a safe and positive environment.

Coach development and safeguarding are intrinsically linked in developing the whole person. The WRU are committed to providing a safe and positive environment for participants to develop their rugby skills in line with the values and beliefs of the organisation by embracing integrity, excellence, success, courage, family and humour, and both coach development and safeguarding are key components in achieving this.

## Coaching and Management Teams

There is a need to ensure that volunteers involved in coaching and management with under 18 teams have a range of skills, and have a child centred approach.

Volunteers and staff involved in coaching and managing adults at risk and mixed ability teams also need to have a wide range of skills, but should also utilise assistance from carers and other support personnel in understanding the needs of participants with a player centred approach.

Coaching and Management Teams should consist of volunteers who all have a defined role within the team. Ideally there should be two qualified Coaches, a Team Manager and a First Aider attached to each team.

It is also extremely useful if there is a qualified Referee attached to the side or amongst this group as part of the team in a dual role i.e. Coach or Team Manager. All of the roles, including those of adult carers should be DBS checked as they will have regular unsupervised contact. Obviously if some are in dual roles which relate to regulated activity i.e. then they would only be required to undertake one DBS vetting check.



# CLUB SAFEGUARDING OFFICERS

## THE ROLE OF THE CLUB SAFEGUARDING OFFICER

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

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

Children are either associated with or can be seen in every rugby club across Wales, and there is a strong association between children and rugby in the communities we live in. Each Club or Women and Girls Cluster Centre, should appoint a designated Club Safeguarding Officer to be the lead contact and have responsibility for all safeguarding issues. The CSO should be registered with the Welsh Rugby Union and will be required to undertake an induction process.

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

The CSO is one of the most important roles in any rugby club or cluster management committee. CSOs are responsible for co-ordinating the safeguarding and welfare of all children, young people and adults at risk.

A key component of effective safeguarding is working together, so it is extremely important that the CSO develops a positive working relationship with the senior Club Secretary and or any other senior management committee officials who have overall responsibility for safeguarding within the club. CSOs should also work closely with Team Managers and Coaches of any under 18 sides within the club, who should also understand the basic principles of safeguarding through coach education or bespoke safeguarding training.

The role and responsibilities of the CSO are included in the CSO Role Description

The CSOs have four main roles within the club:

- Co-ordinating and maintaining compliance in relation to volunteer recruitment and retention through the DBS process
- First point of contact for players, parents, carers and other volunteers regarding any concerns about any welfare, poor practice or abuse issues
- Point of contact for the Welsh Rugby Union regarding any safeguarding issues
- Responsibility for managing safeguarding issues and reporting to the senior management committee

## The CSO in the Club Structure

CSOs are responsible for ensuring that the club or cluster complies with their responsibilities to recruit and retain volunteers in under 18 rugby or teams that have adults at risk, who have been subject to appropriate vetting checks. They co-ordinate and manage the DBS vetting process and monitor compliance levels in line with the requirement of the club audit.

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

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

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

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

The CSO's work closely with the Club Secretary and should be part of the club or cluster management committee at both senior and junior level if there are separate committees. They are required to brief club or cluster management officials on safeguarding matters where appropriate, and they are central to them fulfilling their responsibilities in terms of safeguarding, ensuring that there is a safe and positive environment for everyone. They must also understand their responsibilities in relation to the confidentiality of information and sensitive nature of issues that need to be discussed.

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

CSOs will be supported by the WRU Rugby Operations Team, and Community Rugby Department, and will have the opportunity to develop their skills and abilities in dealing with safeguarding matters through a variety of training opportunities. When a club or cluster volunteer is recruited as a CSO they will receive a Starter Pack from the WRU Safeguarding Team, and also receive a CSO induction with a member of the team, which can be completed in person or over the telephone. The CSO will be briefed on the following issues:

- Safe Recruitment of Volunteers (DBS and SRG Process)
- Promoting Positive Behaviour
- Roles and Responsibilities of the CSO
- Recognising Poor Practice and Abuse
- Reporting and Responding to Concerns
- WRU Case Management Panel Procedures
- Policy and Guidance

CSOs will also have the opportunity for continuous professional development, and are required to attend safeguarding training courses such as 'Safeguarding and Protecting Children' and 'Time to Listen' that are delivered in partnership with UK Coaching, Sport Wales and the NSPCC.

There will be other training opportunities for prospective Coaches with Safeguarding modules on Coach Development Courses, and also online training as a pre-requirement to attend courses. As outlined previously anyone attending the Coach Development Courses will also be required to have a valid DBS certificate, prior to attending.

## CSO Role Description

The Club Safeguarding Officer (CSO) will be supported by the WRU Safeguarding Manager and the Safeguarding Team. The WRU will provide appropriate training and resources for the CSO to fulfil their role.

The Club Safeguarding Officer will-

- Be required to undertake an induction process for the role
- Have good IT Skills, and specifically be able to use the my WRU database and complete online DBS applications via WCVA
- Will assist the club to fulfil its responsibilities to safeguard children, young people and adults at risk at club level
- Assist the club to implement its Safeguarding Plan at club level
- Be the single point of contact (SPOC) in the club for children, young people, adults at risk, staff, volunteers, and parents where there is an allegation of a poor practice issue, abuse or a concern about the welfare of a child or adult at risk
- Is responsible for following the WRU Policy and Procedures
- Ensure that the CSO contact details are displayed in a prominent position in the club i.e. club noticeboard etc.
- Ensure that the appropriate records are maintained. All volunteers' personal details must be retained on the my WRU database (club audit). This will assist compliance with the volunteer recruitment process through DBS checks
- Will report any allegations of poor practice, abuse or a concern about the welfare of a child or adult at risk to the WRU Safeguarding Team or statutory Child Protection agencies such as the local Social Services Department or Police
- Make such reports without delay, it is NOT the role of the club to decide whether a child or adult at risk has been abused or not, this is an assessment that will be made by professional safeguarding staff
- Be the first point of contact for the WRU as a facilitator, if there are any safeguarding issues or an investigation conducted at their club (however the CSO will not be required to conduct the investigation)
- Retain a copy of the WRU Safeguarding Policy and ensure that there is a copy of the policy available for all club members at the club
- Promote safeguarding best practice guidance within the club
- Promote positive behaviour within the club and ensure that the codes of conduct are displayed in a prominent position within the club i.e. club noticeboard
- Ensure that everyone is aware of what training is available and work with the club management committee to ensure that training requirements are met.
- Confidentiality is maintained in relation to Case Management and Safeguarding Referral Group investigations.
- Where appropriate brief the club's management committee on any safeguarding issues at the club
- Anti-discriminatory practice. The club must ensure that it has made clear its commitment to anti-discriminatory practice in its policy, procedures and plans for safeguarding children and adults at risk
- Co-ordinate and manage compliance of the DBS process at club level and work with the Club Secretary to manage compliance in relation to volunteer recruitment and appropriate vetting via DBS
- Ensure that all volunteers who have regular unsupervised contact with children (see definition of regulated activity) are subject to appropriate vetting procedures via the DBS process
- Be the key information link between volunteers and WRU Safeguarding Unit



# RECOGNISING POOR PRACTICE AND ABUSE

## RECOGNISING POOR PRACTICE AND ABUSE

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

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

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

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

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



## Abuse and Neglect of Children

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

It is not only the stressful events of abuse that have an impact, but also the context in which they take place. Any potentially abusive incident has to be seen in context to assess the extent of harm to a child and appropriate intervention. Often, it is the interaction between a number of factors that serve to increase the likelihood or level of actual significant harm.

For every child and family, there may be factors that aggravate the harm caused to the child, and those that protect against harm. Relevant factors include the individual child's means of coping and adapting, support from a family and social network, and the impact of any interventions. The effects on a child are also influenced by the quality of the family environment at the time of abuse, and subsequent life events. An important point, sometimes overlooked, is that the way in which professionals respond has a significant bearing on subsequent outcomes.

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

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

### Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or

- Otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child. The following are examples of physical abuse in a rugby environment:
- Coaches, Managers or other volunteers exposing young players to exercise or training which disregards the capacity of their immature and growing body
- Coaches, Managers or other volunteers exposing young players to overplaying, over training or fatigue
- Coaches, Managers or other volunteers exposing young players to alcohol, or giving them the opportunity to drink alcohol below the legal age
- Coaches, Managers or other volunteers exposing young players to performance enhancing drugs and recommending that they take them
- Coaches, Managers or other volunteers exposing young players to recreational drugs

## Emotional Abuse

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

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

- The following are examples of emotional abuse in a rugby environment:
- Humiliating children or in front of others
- Providing repeated negative feedback
- Repeatedly ignoring a young player's efforts to progress
- Repeatedly demanding performance levels above those of which the young player is capable
- Over emphasis on winning and not enough on development

## Sexual Abuse

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

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

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

## Neglect

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

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

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

## Effects of Abuse

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

## Factors that increase the likelihood of Risk

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

## Indicators of Abuse

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

### Physical Signs of Neglect

- Hunger- sometimes begging or stealing food from other children or searching through waste or bins
- Clothing- Inappropriately dressed
- Appearance- Unkempt, dirty or smelling
- Loss of weight or constantly underweight
- Regularly looking tired or uncared for
- Behavioural Signs of Neglect
- Regularly on their own or may have few friends
- Regularly feeling tired
- Failing to attend hospital or medical appointments
- Left alone and unsupervised on a regular basis
- Regularly late for school or absent from school

### Signs of Physical Abuse

- Unexplained bruising, marks or injuries
- Bruises which indicate 'hand marks'
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Behavioural Signs of Physical Abuse
- Fear of parent being contacted
- Aggressive or angry outbursts
- Running away
- Fear of going home
- Flinching
- Depression

## **Keeping bruises or marks covered**

- Reluctance to change clothes
- Withdrawn and/or remote behaviour

## **Physical Signs of Sexual Abuse**

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

## **Physical Signs of Emotional Abuse**

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

## **Behavioural Signs of Emotional Abuse**

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

## Physical Signs of Bullying

- Short of money
- Damaged clothes
- Loss of possessions
- Regularly tired
- Stomach aches or headaches
- Visible bruising, marks or injuries
- Behavioural Signs of Bullying
- Withdrawn or depressed
- Insecure
- Struggles to concentrate
- Reluctance to attend school or training
- Fear or avoidance of a particular individual or group
- Mood changes
- Drop in performance at school or sport

## Identifying Significant Harm

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

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

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

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

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

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

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



## Adults at Risk Abuse

The signs of abuse can often be difficult to detect. This policy aims to help people who come into contact with people with care and support needs to identify abuse and recognise possible indicators. Many types of abuse are also criminal offences and should be treated as such.

### Types of harm or abuse:

#### Self-Neglect

This covers a range of behaviour, neglecting to care for one's personal hygiene, health or surroundings

#### Modern Slavery

This encompasses slavery, human trafficking, forced labour and domestic servitude

#### Domestic Abuse

This includes psychological, physical, sexual, financial and emotional abuse perpetrated by anyone within a person's family

#### Discriminatory

Discrimination is abuse which focuses on a difference or perceived difference, particularly with respect to race, gender, disability or any of the protected characteristics of the Equality Act.

#### Organisational

This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's own home. This may range from one off incidents to on going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

#### Physical

This includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions

#### Sexual

This includes the commission of any offences with a sexual motivation such as sexual assault or harassment, and includes online offending.

#### Financial or Material

This includes the commission of any dishonesty offences, such as theft, fraud internet scamming, or coercion in relation to an adults financial affairs or arrangements.

## **Neglect/ Acts of Omission**

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

## **Emotional or Psychological**

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Other types of abuse or harm could also include cyber bullying, forced marriage, and radicalisation.

Here are some examples of adult safeguarding issues in sport

- An elite athlete being groomed for sexual abuse by his or her coach
- A member of a learning disabled sports club being financially exploited by another club member
- A coach who regularly neglects the individual needs of disabled participants when training
- A volunteer noticing that a club member seems scared of the personal assistant who brings her to training

## **Mental Capacity – Making Decisions**

The Mental Capacity Act 2005 (MCA) states that every individual has the right to make decisions and provides the framework for this to happen.

The issue of capacity or decision making is a key one in safeguarding adults. It is about making sure that people over 16 years of age have the support they need to make as many decisions as possible.

The MCA also protects people who need family, friends or paid support staff to make decisions for them because they lack capacity to make a specific decision.

To make a decision we need to :

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

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

It is important to recognise that adults must be included in the decision making process and that they have the right to make their own decisions.

## Indicators of Abuse or Harm

Abuse can take place in a rugby environment or outside it, in any context. It may be inflicted by anyone in the club who a player or volunteer comes into contact with, but it can also happen in other environments, and it's important that Coaching and Management Teams recognise the signs of abuse. They may suspect that an adult at risk is being abused or neglected, and below are some of the signs and indicators -

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.
- Poor Practice

Poor practice may be defined as behaviour that does not respect the rights of the child or adult at risk or their parent, guardian or carer's rights, or it contravenes best practice, as outlined in the Safeguarding Policy. It is important that the policy and procedures are promoted through our rugby clubs so that we maintain a safe and positive environment.

It is important that coaches are qualified and suitably skilled, there is a need to ensure that we develop best practice in everything that we do, and as coaching is a continual learning process, it is important to recognise that by recruiting, developing and retaining qualified and skilled coaches, that this will minimise the risk of poor coaching practice.

The Safeguarding Policy is designed to assist in protecting the most vulnerable people in our game, but also protect our hard working and enthusiastic volunteer workforce.

There are some behaviours that would be considered poor practice and although highly unacceptable within the sport, would not be fully encapsulated by the definitions of abuse. These may not reach the threshold to refer to statutory agencies but they must always be reported, addressed and action taken to prevent re-occurrence. There are a range of examples below:

- Inappropriate behaviour or overbearing conduct
- Excessive training and competition pressure
- Failing to follow appropriate safeguarding and coaching processes
- Not providing players with appropriate training, guidance and support
- Failing to respect the rights of players, parents, coaches, officials and other volunteers within the game
- Failing to take responsibility for the welfare of children or adults at risk
- Failing to respect decisions made by officials
- Failing to comply with the Codes of Conduct

The CSO should refer the matter and consult with the WRU Safeguarding Team, and if poor practice is suspected, then this may require further investigation.

The CSO may seek advice about whether it is appropriate to initiate club disciplinary processes, and the need for immediate suspension pending the outcome of an internal investigation within this process.

The matter may have been reported via the WRU Disciplinary process, and a decision will be made in consultation with WRU Safeguarding Team as to who has primacy in relation to the investigation.

If the allegation is about poor practice by the designated CSO, or if the matter has not been dealt with appropriately and concerns remain, it should be referred to the WRU Safeguarding Team.

All internal investigations conducted by the WRU are subject to scrutiny and supervision by the WRU Safeguarding Case Management Panel.

In some cases, there is a fine line between poor practice and abuse and it may be important to seek advice and guidance. If it is an internal club disciplinary matter, the advice could be provided by the WRU Safeguarding Team. If the matter is under investigation by the WRU Safeguarding Team, then it may be appropriate to seek advice from the Police, Social Services, Child Protection in Sport Unit or in the case of adult at risk abuse, the Ann Craft Trust.

Once the matter has been investigated, a decision should be taken on an appropriate course of action. If the individual has no previous recorded disciplinary or safeguarding sanctions imposed upon them, and they accept that their behaviour was inappropriate or fell below the required standards, then the action plan or recommendation could include involvement in a training or mentoring programme.

Although it is often possible to resolve poor practice through guidance, mentoring and additional training, particularly where the individual is willing to accept their conduct was inappropriate, in some instances poor practice concerns need to be managed as a disciplinary matter.

If the individual does not accept that their conduct was inappropriate then they may be referred to the WRU Discipline Committee or the WRU Case Management Panel (see WRU Safeguarding Disciplinary Procedures)

## Practices never to be Sanctioned

- The following practices are known to be significant risk factors in cases of abuse and can never be condoned:
- Taking children or adults at risk to your home or other secluded place unaccompanied by others
- Engaging in rough, physical or sexually provocative games
- Sharing a room with a child
- Allowing or engaging in any form of inappropriate touching
- Making sexually suggestive remarks
- Reducing a child or adult at risk to tears as a form of control
- Allowing children to use inappropriate language unchallenged
- Allowing allegations made by a child or adult at risk to go unchallenged, unrecorded or not acted upon
- Leaving any training or match without ensuring the safe dispersal of children or adults at risk
- Carrying out personal care for a child that the child can do unaided
- Abusing a privileged position of power or trust
- Resorting to bullying tactics, or verbal abuse
- Causing a participant to lose self-esteem by embarrassing, humiliating or undermining the individual
- Spending excessive amounts of time alone with children or adults at risk away from other adults, or carers.

It may sometimes be necessary for adults to do things of a personal nature for children, or as a carer for an adult at risk. This would include tasks such as removing outer layers of clothing, tying up hair etc. These tasks should only be carried out with full understanding and consent of the appropriate person i.e. the child (dependent upon age) parent or guardian, adult at risk or carer.

There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in a task that involves physical contact. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

Some children, particularly children with learning disabilities or serious physical disabilities may not be toilet trained or require significant assistance to use these facilities. This can also be the case in relation to adults at risk.

In some situations, this may lead to increased vulnerability for the child, adult at risk and the person providing the care, particularly as some children or adults at risk with learning disabilities can find it difficult to set and maintain physical boundaries. Therefore, where a person requires this type of care, a parent/carer or someone trained in the provision of intimate care must be on hand to address these needs.



## REPORTING AND RESPONDING

This section of the policy sets out the necessary procedures and standards to follow for Welsh Rugby Union employees or volunteers when allegations of abuse or poor practice are reported. The procedures set out in this section also constitute minimum standards for any Club directly delivering mini, junior, youth, girls and mixed ability rugby opportunities.

The WRU assures all employees and volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports his or her concerns about a colleague or the possibility that a child or adult at risk may be being abused.

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

The WRU are also committed to ensuring that any safeguarding disciplinary investigations involving adults at risk are managed with the interests of the person at the centre of it. The WRU will strive to ensure that they promote individual well-being, and that people have a voice, with their views, wishes, feelings and beliefs taken into account when decisions are made.

### How Abuse may be Reported

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

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

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

Child or Adult Protection concerns may arise from:

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

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

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

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

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

It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be, abusing a child or adult at risk, will raise concerns among other staff or volunteers. This includes the difficulties inherent in reporting such matters. If any person has knowledge, concerns or suspicions that a person is suffering, has suffered or is likely to be at risk of harm, it is their responsibility to ensure that the concerns are referred to Social Services or the Police, who have the statutory duties and powers to make enquiries and intervene when necessary.

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

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

## **Responding to a disclosure from a Child or Adult at Risk**

It is not the responsibility of people in sport to investigate allegations of abuse, but if a disclosure is made or concerns are raised, it is important to know how to respond.

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

- Identify if someone is injured or at immediate risk, and if so take immediate action by seeking help i.e. contacting the Police or Ambulance
- Stay calm and ensure that the child feels safe and is not at any immediate risk
- Show the child that you have heard what they are saying, and that you take their allegations seriously
- Reassure the child that they've done nothing wrong
- Allow the child to talk freely, and use their own words, but do not probe for more information than is offered as this may affect any subsequent investigation by Police and/or Social Services
- Don't interrupt when the child is recalling significant events
- Don't make the child repeat their account
- Don't allow your emotions, shock or disgust to show
- Do not make negative comments about the alleged abuser and do not approach him/ her
- Recognise any difficulties the child may have in explaining the incidents
- Reassure the child that they have done the right thing in revealing the information
- Explain what actions you must take, in a way that is appropriate to the age and understanding of the child
- Do not promise to keep what you have been told secret or confidential, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust
- Record in writing what was said using the child's own words as soon as possible
- Tell only those people that need to know i.e. CSO

If the child indicates that he/she does not wish others to be informed about the allegations, it is important to sensitively explain why you need to share the information, it is important to be honest in your approach.

If an Adult at Risk discloses that they are being abused, the safety of the individual is the paramount consideration. The person receiving the information should:

- If someone is injured or at immediate risk, take immediate action by seeking help i.e. contacting the Police or Ambulance
- Seek consent from the person concerned, only if you feel that they do not have the capacity to consent, you can then act without consent, but you must record your decision in writing.
- Collect relevant facts and appropriate information
- Make a written record of the concern
- Tell the person involved what you are going to do about the concern and note any views that they may have regarding how they wish the matter to be dealt with
- Tell only the people who need to know i.e. CSO

## Recording Information

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

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

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

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

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

The report can be made via e-mail to the WRU Safeguarding Team and should be marked as confidential. The referral should contain personal information and an incident report :

- Personal Information - Victim
- Name of the Club
- Time and Date of Incident
- Name of the Child or Adult at Risk
- Date of birth or age of the person
- Address and Contact details
- Date of birth or age of the person details
- Ethnicity
- Any additional needs of the person
- Name of the Parent or Guardian
- Parent or Guardian contact details



## Personal Details – Person Subject of Concern (PSC)

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

## Incident Report

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

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

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

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

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

## Aide Memoir to Complete Witness Accounts

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

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

**PLAT** - focuses upon details of **PEOPLE, LOCATION, ACTION AND TIME**.

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

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

- Brief introduction about yourself
- Why were you present, in what capacity?
- When and where did this occur?
- Who was present?
- What are the weather conditions?
- What did you see?
- Are there any specific incidents that you feel were relevant and describe them in as much detail as possible?
- How did you feel about what you witnessed?

If you witness a specific incident please consider the following using the 5WH principles:

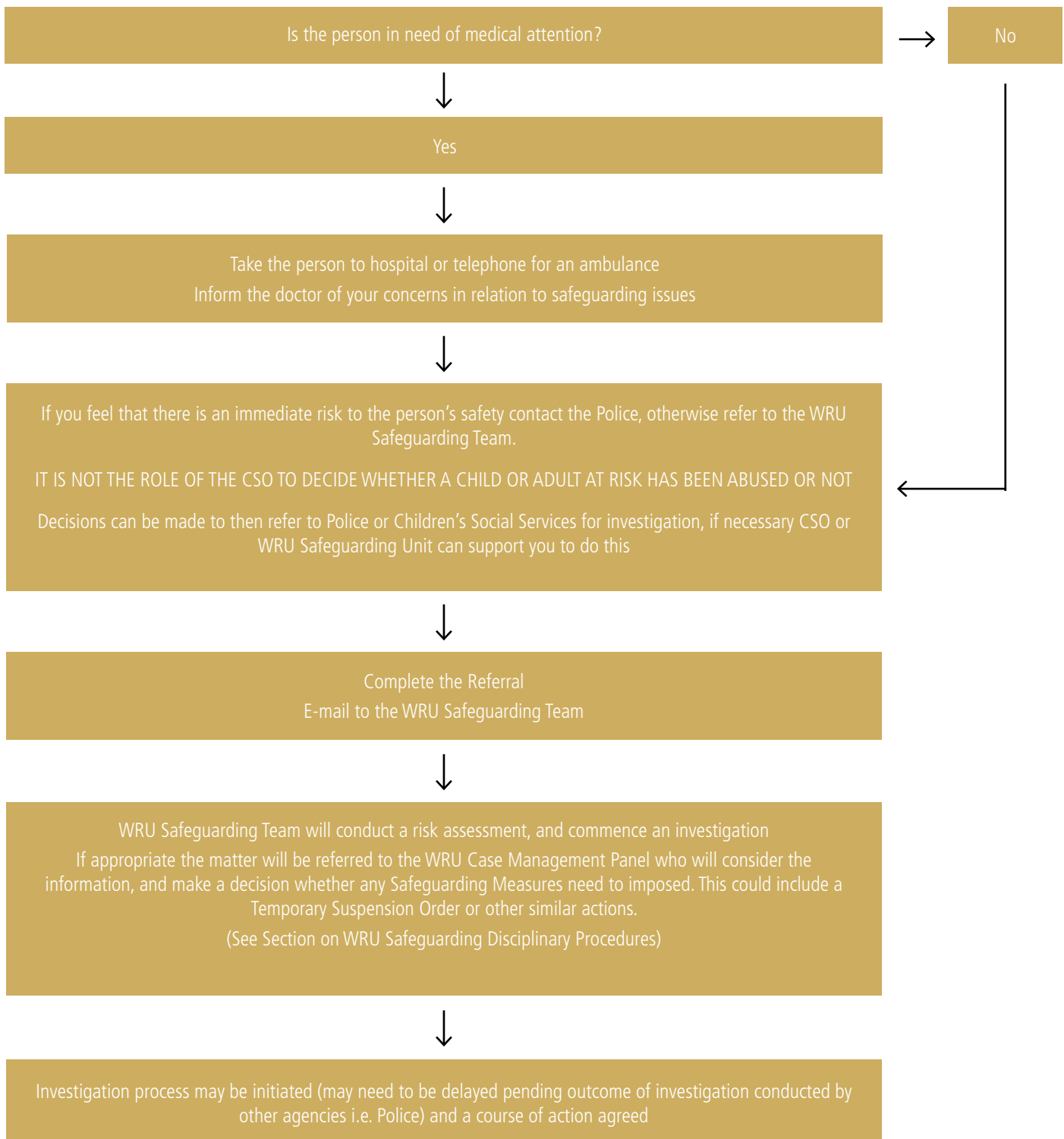
- Amount of time did you have the incident under observation?
- Distance - How far away were you?
- What was the visibility like, were there any obstructions?
- Do you know the people involved and in what capacity?
- If you do not know the people involved can you describe them?
- Did you make any notes and what was the time lapse between the incident and making those notes?
- Is there any special reason to remember a particular person

**REPORTING AND  
RESPONDING TO  
ALLEGATIONS OF  
ABUSE**

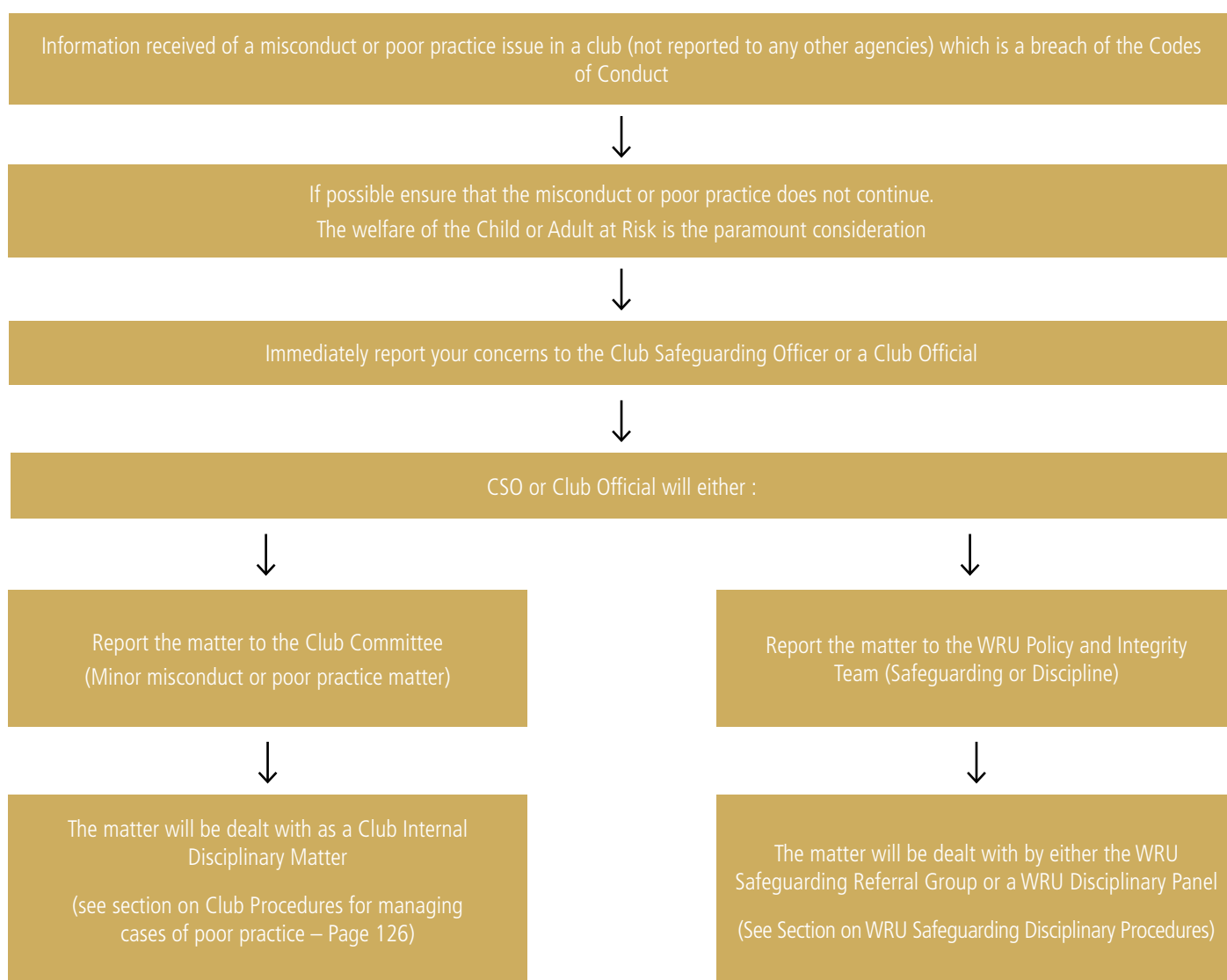
## RESPONDING TO ALLEGATIONS OF ABUSE (within or outside a rugby environment)

Follow the Six R's. Recognise what the issues are and ensure that the Child or Adult at Risk is Reassured. If there is a risk of further immediate abuse, take action and if urgent contact the Police. Record what is said or a summary of this and ensure that you Retain any written records.

Do not make promises of confidentiality.



## RESPONDING TO AN ALLEGATION OF POOR PRACTICE



## SAFEGUARDING CONTACTS

There are a list of safeguarding contact numbers included below

Contact Details:

### **Welsh Rugby Union Integrity Hotline**

029 20 822 200

Integrity@wru.wales

### **Welsh Rugby Union Safeguarding Team**

WRU Centre of Excellence

Vale of Glamorgan Resort

Hensol

CF72 8JY

02920 822330

02920 822442

### **NSPCC National Centre**

42 Curtain Road

London Helpline: 0808 800 5000

EC2A 3NH

0808 800 5000

### **Childline UK**

Freepost 1111

London

N1 OBR

0800 1111

[www.childline.org.uk](http://www.childline.org.uk)

### **NSPCC Cymru/Wales**

Child Protection Helpline

0808 100 2524

### **NSPCC – WALES - Child Protection in Sport Unit**

Sport Wales National Centre

Sophia Close

Cardiff

CF11 9SW

02920 334975

### **NSPCC – NATIONAL - Child Protection in Sport Unit**

3 Gilmour Close

Beaumont Leys

Leicester

L4 1EZ

0116 234 7278

### **NSPCC 24 hour Helpline**

0808 800 5000

### **Ann Craft Trust**

Sport Wales National Centre

Sophia Close, Cardiff, CF11 9SW 02920 334975 or

0115 951 5400

## Reporting Concerns

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

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

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

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

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

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

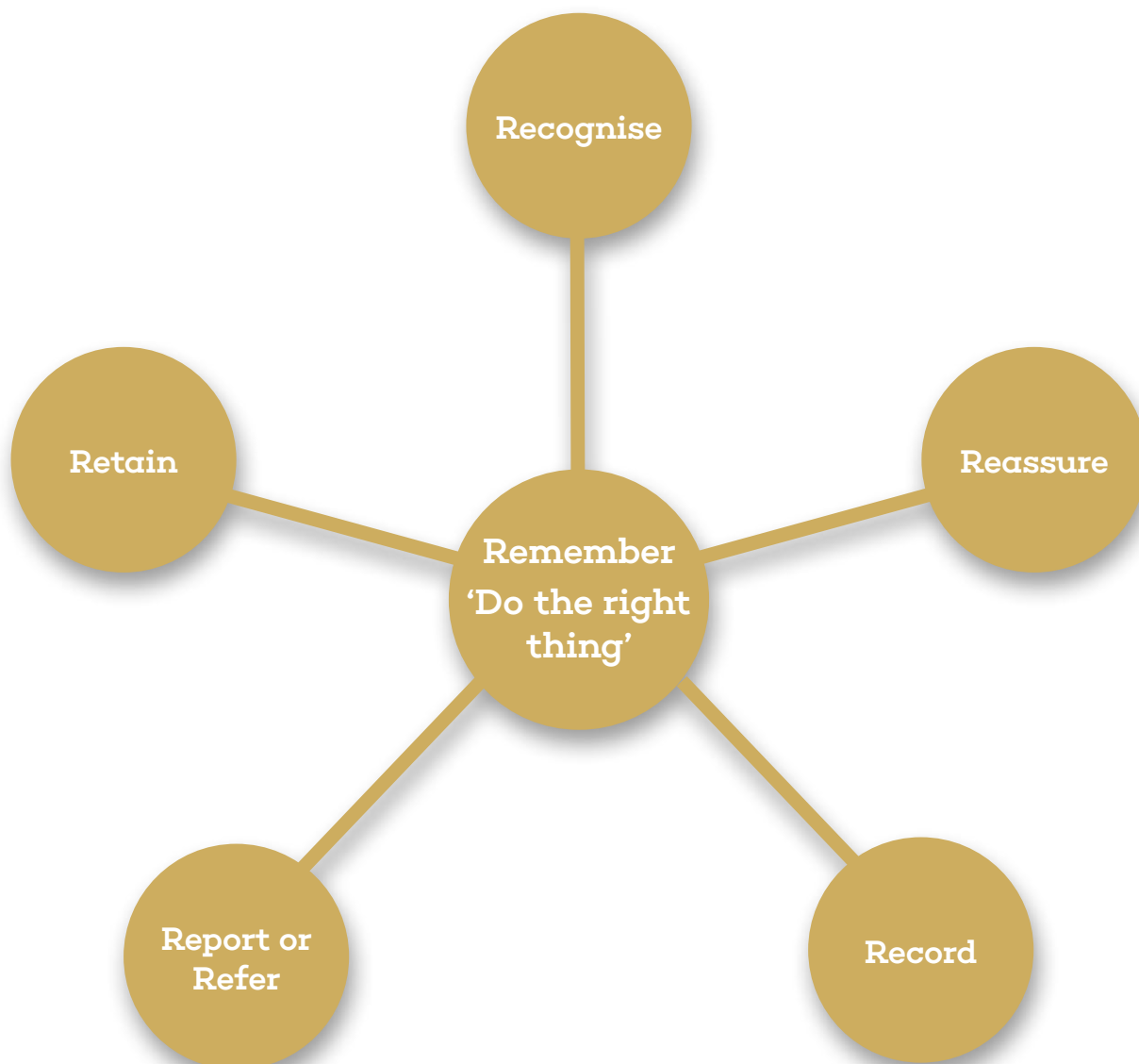
- Report your concerns to the Club Safeguarding Officer ASAP
- Report the matter to the WRU Safeguarding Team ASAP
- The CSO or the WRU Safeguarding Team must refer the matter without delay to Social Services and/or the Police. If the CSO takes this step they must also inform the WRU
- The parent, guardian or carer will be informed at the earliest opportunity, unless this is inconsistent with the need to ensure the victim's safety, but advice should be sought from Social Services as to what information should be provided to parents, by whom and when
- If a child is at immediate risk and action needs to be taken urgently, a 999 call must be made to the Police
- In the event that there is any uncertainty as to whether a referral is appropriate, the WRU Safeguarding Team, NSPCC 24-hour helpline or Social Services will be able to offer advice on what action to take
- In the case of non-recent abuse, disclosures must still be reported to Social Services and Police, as above, as the perpetrator may continue to present a risk to other children or adults at risk.

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

## The Six 'R's

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

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





# Child Protection and Adults at Risk Investigations

## The role of the Police and Social Services

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

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

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

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

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

- The strategy discussion must consider any wider safeguarding needs.
- The strategy discussion may result in the decision to take one or more of the following course(s) of action:
- No further action - if it transpires that the allegation is without substance and there are no other concerns
- Referral to support services if preliminary enquiries have revealed significant unmet needs for support and services but no issues in relation to significant harm
- Child or adult protection enquiries
- Emergency action to safeguard the child if he or she is considered to be at imminent risk of significant harm

## Whistle Blowing

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

The WRU have a dedicated Integrity Hotline and e-mail address for members of the public or staff to report any integrity concerns that they have, and this includes safeguarding, anti-doping and other integrity related matters. (See contact details on page 71)

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

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

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

Anyone who in good faith, reports allegations of poor coaching practice, or allegations of abuse, will have the matter dealt with in a positive manner.

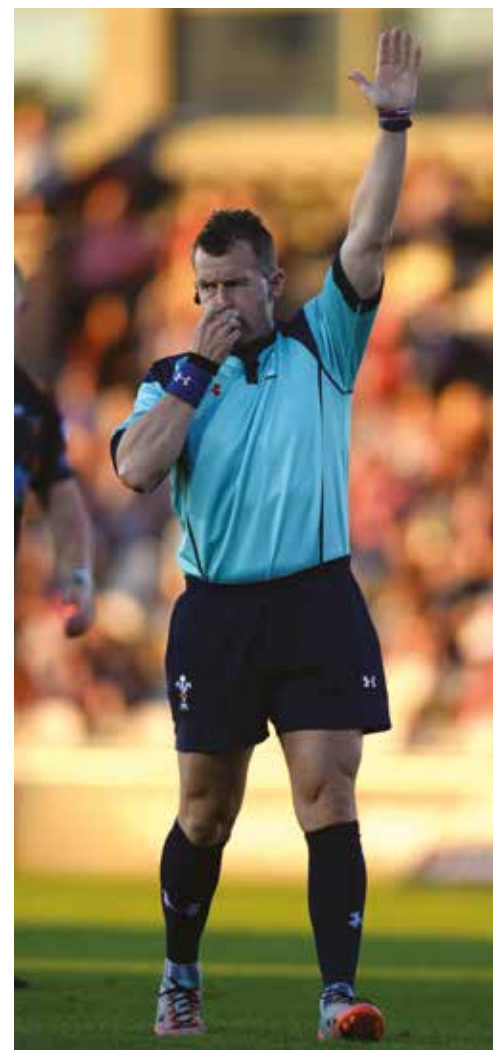
It is acknowledged that individuals are often very reluctant to report concerns through fear of negative reprisal. The WRU will take action against anyone who has harassed or victimised a whistle blower. The identity of individuals who wish to remain anonymous will not be disclosed without first taking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

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

Individuals are encouraged not to report matters anonymously, and allegations that are made anonymously may be investigated depending on the seriousness of the issues raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

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

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



## Allegations of previous abuse

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

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

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

If the WRU are aware of information through previous involvement with rugby, and new concerns come to light, the WRU can consider all of the information available in order to make an informed safeguarding decision. If the person in question has been permanently suspended from working with children or vulnerable adults, the WRU can consider the appropriateness of their role. The Case Management Panel will assess each case on its individual merit.

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

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

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



## Confidentiality and Information Sharing

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

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

### Sharing Concerns with Parents

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

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



**SAFEGUARDING  
AGAINST THE  
ABUSE OF POWER**

# SAFEGUARDING AND THE ABUSE OF POWER IN SPORT

## Bullying

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

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

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

Whether it be in a domestic environment, school or workplace of sports setting bullying can be - Physical – hitting, kicking, pushing, pinching, unwanted physical contact and taking things

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



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

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

Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons – being overweight, physically small, having a disability or belonging to a different race, faith or culture, where it is difficult for those bullied to defend themselves. People who bully others behave like this for a variety of different reasons and may in some cases have been abused. Typically bullies can have low self-esteem, be excitable, aggressive and jealous. Crucially, they have learned how to gain power over others and there is increasing evidence to suggest that this abuse of power can lead to crime.

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

People who have been bullied will often benefit from ongoing support to deal with the impact. As well as support from the CSO, victims of bullying can benefit from peer support. It is important that parents/carers are involved as they are likely to be a key source of support. The club may consider holding a reconciliation meeting to help address the issues between the bully and the bullied person.

## **The competitive nature of sport makes it an ideal environment for the bully.**

### **A bully in sport can be:**

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

### **Developing an Anti-Bullying Policy**

The club or organisation will:

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

Each participant, coach, volunteer and official will:

- Respect every child and adults at risk's need for, and rights to a safe and positive environment where security, praise, recognition and opportunity for taking responsibility are available
- Respect the feelings and views of others
- Recognise that everyone is important and that our differences make each of us special and should be valued
- Show appreciation of others by acknowledging individual qualities, contributions and progress
- Be committed to the early identification of bullying, and take prompt and collective action to deal with it
- Ensure safety by having rules and practices carefully explained and displayed for all to see
- Report incidents of bullying they see – by doing nothing you are condoning bullying



Children and Adults at Risk need to be supported by:

- Letting them know who will listen to and support them
- Establishing systems to enable children and adults at risk to talk about bullying or any other issues that affects them
- Identifying and addressing potential barriers to talking at the outset to enable children or adults at risk to approach others for help
- Ensuring they have access to Helpline numbers
- Making sure anyone who reports an incident of bullying is listened to carefully and supported
- Objectively investigating any reported incident of bullying and listening carefully to all those involved
- Supporting anyone being bullied and giving assistance in upholding their right to play and live in a safe environment which allows their healthy development
- Supporting and encouraging those who bully to stop
- Avoiding sanctions for those bullying others that involve long periods of isolation, or which diminish and make individuals look or feel foolish in front of others

### **Responding to an allegation of bullying:**

Take all allegations of bullying very seriously and make a commitment to address those issues

- Support the person, and encourage them to speak about their concerns and tell the person in charge or someone in authority
- Establish what they want from the investigation
- Investigate all allegations and take action to ensure the victim is safe
- Speak with the victim and the bully separately
- Reassure the victim that you can be trusted and will help them, although you cannot promise total confidentiality
- Keep records of what is said (what happened, by whom, when)
- If it's a child talk to the victim's parents
- If it's an adult at risk talk to someone who provides support for them
- Report any concerns to the Club Safeguarding Officer wherever the bullying is occurring
- Ensure that everyone in the club organisation understands their responsibility to work together to stop bullying

Parents, Guardians and Carers need to be supported by:

- Advising them on the club or organisation's bullying policy and practice
- Discussing any incidents of bullying with them
- Consulting them on proposed actions to be taken (for both victim and bully)
- Ensuring information and advice on coping with bullying is made available to them
- Offering support including information on other agencies or support lines

### Action to be taken to Influence the Behaviour of Bullies

- Talk with the bully, explain the situation, and try to get the bully to understand the consequences of their behaviour.
- Seek an apology to the victim
- Clear agreement about acceptable behaviour
- If it's a child inform the bully's parents
- Insist the return of 'borrowed' items and that the bully compensates the victim
- Provide support for the coach and significant others
- Impose sanctions as necessary
- Hold meetings with the families to report on progress
- Inform those who need to know of the action taken
- If the bullying continues, remove the bully from taking part



## Online or Cyberbullying

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

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

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

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

Everyone should take action and be responsible in order to prevent online harassment, abuse and bullying of others. There are strategies that can be employed to stop the bully contacting you on social networks, mobile phones, instant messaging and even games consoles. As mentioned previously it is important that people check out the privacy or safety settings of the service you are using. You can also ring up your service provider or network provider who can help you block the abuse.

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

If there is an issue in relation to online bullying, it is important to ensure that you keep the evidence by saving or copying any abusive texts or conversations, to assist in investigating any such issues. A good way to do this is to press the 'PrtScrn' button on the right hand side of the keyboard which prints the screen and you then copy and paste this into a word document or try using window's 'snipping tool'.

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

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

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

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

Check the privacy settings which will allow you to choose what information you share with people, for example you can set your profile or data to "private" or only allow certain people to contact you and view particular information. Don't ever share where you live, your telephone number or email address with cyber-friends.

## **When to Inform the CSO about Bullying Incidents**

When bullying (physical, verbal or psychological) persists despite attempts by staff and volunteers to deal with it, the matter should be referred to the CSO. The club will have responsibility to investigate any allegations of bullying, and if possible should seek an early and appropriate resolution. If this is not achievable then the club should then consider internal disciplinary action.

In the most serious cases there may be a need to report the matter to the WRU Safeguarding Team or even the Police, however it is always recommended that appropriate action is taken by the club at an early stage in attempting to resolve such issues.

If you need any advice and guidance on this issue please contact the WRU Safeguarding Team.

## **Hazing, Initiation and Ceremonies**

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

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

These are issues that should generally be managed by the club, however in the most serious cases it may result in matters being reported as safeguarding concerns to the WRU Safeguarding Team or to outside agencies.

## Child Sexual Exploitation (Grooming)

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

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

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

The manipulation or 'grooming' process involves befriending children, gaining their trust, and often providing them with drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

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

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

Research demonstrates that a child is likely to be abused by someone they know and who is likely to be in a position of trust with a child. Whilst the vast majority of sexual abusers are male it is important not to overlook that fact that female sexual abusers do exist.

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

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

There is further guidance available through the Child Protection in Sport Unit website: <https://thecpsu.org.uk>

## Abuse of a Position of Trust

A relationship of trust exists where an adult, by virtue of their role, is in a position of power or influence over a young person. Sections 16-24 of the Sexual Offences Act (2003) relate to criminal offences where a person in a position of trust defined within the scope of the Sexual Offences Act, engages in any sexual activity with a person under the age of 18 with whom they have a relationship of trust, irrespective of whether the young person has ostensibly consented to the relationship.

The primary motivation for legislation which addresses the abuse of positions of trust is the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives. The law defines specific roles and settings where sexual activity between 16 and 17 year olds and those in positions of trust, responsibility or authority constitutes a criminal offence.

This legislation does include sports roles (e.g. coaches, instructors or helpers) or sports organisations and settings (e.g. clubs, leisure facilities or events) within these definitions.

Therefore at present, an abuse of a position of trust within most sport contexts will not be illegal, although there may be circumstances in which the law does apply to sports coaches - for example if they are employed by and operating within a school.

Although the law does not currently apply to coaches and others involved in sports clubs, the WRU considers that it is completely unacceptable for anyone to engage in sexual activity within a relationship with a child or young athlete in a position of trust. However there are also other offences under the Sexual Offences Act 2003 that may be committed in these circumstances such as arranging or facilitating the commission of a child sex offence (section 14) or meeting a child following sexual grooming (section 15). In addition to this there is now an offence in the Sexual Offences Act 2003 (section 15A), which criminalises sexual communication with a child. This legislation was introduced through the Serious Crime Act 2015.

The WRU will work to the principles behind the legislation, and as such any person in a position of trust who abuses this position will breach the WRU Codes of Conduct and the WRU Safeguarding Policy.

The WRU Codes of Conduct outline the standards of ethical and professional behaviour that are required from a Coach or Team Manager.

Although the law does not apply to coaches and others involved in sports clubs, the WRU considers that it is completely unacceptable for anyone who is in a position of trust to engage in sexual activity with anyone under 18. There are other offences under the Sexual Offences Act 2003 that may be committed in these circumstances such as arranging or facilitating the commission of a child sex offence (section 14) or meeting a child following sexual grooming (section 15).

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

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

If you engage in an intimate or inappropriate relationship with a child while you are in a position of trust, regardless of whether they are legally able to consent or not, this will be considered as a clear breach of the Safeguarding Policy and Codes of Conduct and will result in disciplinary action.

There is further guidance available through the Child Protection in Sport Unit.

## Safeguarding Young Players and the Pathway Process

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

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

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

The WRU are committed to working with staff that are involved in managing the performance pathway or similar programmes to ensure that they understand their safeguarding responsibilities, and provide a safe and positive environment for those young athletes to develop and thrive.

Rugby players at all levels deserve to train and compete in a safe, healthy and stimulating environment. Responsibility for creating a safe, player-focused environment lies with the coaching and management staff, and ultimately the WRU.

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

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

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

These factors include:

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

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

## Training and Competition

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

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

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

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

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

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





## Managing Player Demand

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

It must be highlighted that potential safeguarding issues can arise when a coach develops training programmes and competition schedules that are focused on the goals of the sport rather than the needs of the young person.

This may include:

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

An example of this may be an under 15 player who is selected to play above his age group at regional level, and also required to play in the Dewar Shield under 15 competition, and also be required to play for school and club. These situations need to be managed effectively and ensure that the demand upon the child both physically and mentally is not excessive.

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

As talented young players progress through the pathway strength and conditioning training becomes more prevalent, the welfare of the individual must be the primary focus. There is a need to development their strength and conditioning to equip them with the physical attributes for the modern game at the elite level.

However strength and conditioning should not be viewed as simply an addition to an overall training and competition programme for a child, but rather as a key factor in long-term athletic development.

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

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

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

## **Abuse of Power - Managing Relationships and Boundaries**

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

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

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

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

Coaches need to understand that there are personal behavioural boundaries that should not be crossed. Examples of this include unsupervised social outings, inappropriate social media contact, inappropriate conversations in person or via phone and highly personal conversations that were irrelevant to the athlete's participation in sport.

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

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

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

Players also need to be managed effectively when returning to play after injury, and coaches need to be aware of the balance of power in situations such as this. It should be a collective decision between medical staff, coaching staff, parents (if the player is under 18) and player, and again it is vitally important that player welfare is the main consideration in this decision.

It is important that coaches also manage player transition appropriately, this may be transition from age grade to senior rugby or for those athletes who are not successful in obtaining a professional contract transition from elite sport back into the community game.

Recommendations aimed at improving athletes' welfare have been published as part of a major independent report into British sport. They are the result of a year-long duty of care review commissioned by the UK government and led by 11-time Paralympic gold medallist Baroness Tanni Grey-Thompson.

The review identified a number of themes for sports to consider regarding their Duty of Care, and these relate to -

- Education
- Transition
- Representation of the participants voice
- Equality, diversity and inclusion
- Safeguarding
- Mental Welfare
- Safety, injury and medical issues

The full report can be accessed via the link below

**<https://bit.ly/30ypGHL>**

The welfare and safety of elite players must be given the priority they deserve. The talent pathway can provide fantastic experiences and rewards for young players. However, there are specific factors in elite sport that can make talented athletes more vulnerable to abuse. This abuse can manifest itself in many different ways, and the role of parents, guardians and coaching staff are extremely important in ensuring that their welfare is managed appropriately.

The use of inappropriate messaging or sharing inappropriate photographs on social media can also present a safeguarding risk (see social media section)



## Doping

Doping within sport is also a safeguarding and child protection issue. It is important to identify high risk players and situations and pro actively work with the WRU Integrity Team to raise awareness of these issues.

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

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

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

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

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

Please see the WRU Anti-Doping Protocol and Guidance for further information.



## Discriminatory Language and Behaviour

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

The WRU are clear that all forms of discrimination are equally distasteful and counter to the values of our sport.

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

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

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

Bullying, by contrast, is subtly relentless, intentionally wounding and one directional. Banter can never be used as an excuse for bullying behaviour and it is important to recognise that for some, banter is a route into bullying. Therefore boundaries need to be set and upheld. While there is greater understanding of this than previously, the system is far from perfect. There is guidance on bullying and developing an anti-bullying policy on page 94)

## Managing Parents and Players Expectations

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

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

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

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

Players and parents should be provided with specific feedback and should have an exit interview, so that their transition from this environment into the community game is as comfortable as possible

## What can Players do to Safeguard Themselves?

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

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

### **Know their rights and responsibilities**

Athletes will have responsibilities to comply with their sport's code of conduct, and also those related to specific areas such as anti-doping. Athletes' rights and options should be made clear to them.

### **Be familiar with their sport's safeguarding policy and procedures**

These policies and procedures will have information about what athletes can expect the organisation to do to look after their well-being, and what is expected of the individual and other people such as parents and coaches.

### **Be committed to the code of conduct**

The WRU has a code of conduct explaining how players are expected to behave, and also how other people are expected to behave. It also outlines what happens if these codes are not followed.

### **Know how to raise any concerns**

It's important that athletes can talk to someone they trust if they have concerns about anything that might be happening to them, or anyone else, in or outside of their sport, this could include abuse, harassment and bullying

Players should also consider what support systems are in place among and beyond their entourage members (family, friends, teachers and/or coaches).

### **Ask for support as they transition through the system**

Transitions can involve entering top-level sport, moving from junior to senior ranks, deselection, appeals, and leaving top-level sport.

Transitions can be really hard; support should be provided to help players navigate through the process. There should be inductions that provide information about how the system operates and what support is available. This should be part of a continuous conversation about the individual's sport and life after top-level sport.

### **Seek opportunities to become a voice for player welfare**

Look for opportunities to get involved and become a voice in decision-making about player welfare and protection. The WRU have mechanisms in place to consult children, young people and parents as part of their reviews of safeguarding policies and practices.

### **Support their peers**

Supporting peers by encouraging and helping them to speak out if they witness or have any concerns about their own or anyone else's welfare.

**WRU SAFEGUARDING  
DISCIPLINARY  
PROCEDURES**

# WRU SAFEGUARDING DISCIPLINARY AND MISCONDUCT INVESTIGATIONS

## (CASE MANAGEMENT PROCEDURES)

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

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

There are many different types of incidents or complaints that are reported to the WRU. Safeguarding and Discipline are both part of the wider Policy and Integrity Team of the WRU Rugby Operations Department.

The incidents or complaints can include matters of poor practice, on field discipline, Code of Conduct complaints or serious child or adult protection issues. The WRU Policy and Integrity Team work in partnership with other WRU teams and departments in responding to these complaints, and all of these may be involved in the discussions as part of the initial assessment process. The incidents are assessed, screened and then referred to the appropriate team.

The WRU Safeguarding Team are experienced in conducting initial safeguarding assessments, and implementing appropriate safeguards. The decisions made in the initial assessment will have the welfare of the child or the adult at risk as the priority, and will be both proportionate and necessary to ensure that the right outcome is achieved.

Information will only be shared on a legal basis and for a safeguarding purpose.

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

There are five different types of investigation that are likely to be conducted:

1. Criminal - conducted by the Police
2. Child Protection - carried out by Social Services and/ or the Police
3. Adult Protection – carried out by Social Services and/ or the Police
4. WRU Internal Investigation (Safeguarding Disciplinary) - conducted by the organisation in response to any concerns or complaints made, which range from misconduct and poor practice issues to serious risk allegations within the sport (these may be conducted at the conclusion of statutory agency investigations)
5. Club Internal Investigation (Safeguarding Disciplinary) – conducted by the club as a misconduct, poor practice or disciplinary issue. Clubs may be supported in this process by the WRU.

The WRU recommend that a referral is made via email to **integrity@wru.wales** with all the necessary information included (see page 81)

This should be completed and e-mailed to the WRU Safeguarding Team at the earliest opportunity.

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



# WRU Codes of Conduct

## Mission Statement

We all have a responsibility, both on and off the field, to promote high standards of behaviour in the Game, as well as uphold the values and image of Welsh rugby.

In line with our strategic vision, our purpose is to ensure more people engage with rugby, as often as possible, with more enjoyment and more success. Our strategic vision is to encourage Club officials to be true to rugby's values and provide role model leadership within the community.

We all want to ensure we protect our players, officials, volunteers, referees and the image and values of our Game.

There are separate Codes of Conduct relating to:

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

For breaches of the Codes of Conduct, the Safeguarding Case Management Panel, the Disciplinary Panel or the WRU Professional Disciplinary Panel (as applicable) may impose such sanctions and penalties as it deems appropriate including, without limitation.

Please see the link below to the current WRU Disciplinary Regulations which outline the Codes of Conduct

## Senior Regulations:

<https://bit.ly/2JERCmw>

## Age Grade Regulations:

<https://bit.ly/2JxeLsd>

## Safeguarding Disciplinary Investigation Process

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

It may be referred to statutory agencies, and a core assessment will be conducted. The incident or allegation may be the subject of a child or adult protection enquiry and a strategy meeting may be convened as part of that process.

This will be attended by a number of different agencies, and if the incident occurred in a rugby environment or there is a potential risk in a rugby environment, a member of the WRU Safeguarding Team will attend or contribute to this meeting.

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

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

Information will continue to be gathered as part of the investigative process, and club members or other witnesses may be required to provide written accounts of what they saw. There is also an aide memoir to assist in completing witness accounts (see page 82)

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

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

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

The Case Management Panel will be fully briefed by a member of the WRU Safeguarding Team (either via e-mail or in person) and required to decide on justified and proportionate safeguarding measures being imposed. These can include temporary measures that can be issued to the person who is subject of concern (PSC), whilst the investigation is being conducted.

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

- Do the allegations indicate that the PSC poses a safeguarding risk to children and/ or adults at risk?
- Is there a breach of the WRU Safeguarding Policy?
- Is there a breach of the WRU Codes of Conduct?
- Does the PSC need to be protected and removed from the environment as a welfare concern?
- Do the allegations amount to misconduct in a safeguarding context?
- Is there a risk to the reputation of the WRU?
- Would the continued presence of the person subject to investigation impede any enquiries/investigation?

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

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

The PSC will be provided with the opportunity to submit a written account/ statement of the incident or offered the opportunity to be interviewed by a member of the WRU Safeguarding Team, generally once any statutory agency investigation has been concluded.

The PSC will have the opportunity to provide any other information which they feel is relevant to the matter under investigation.

They will be able to have a representative with them if they so wish, but they should notify the WRU in advance of this.

The PSC will also have the opportunity to provide references, and will be updated periodically in relation to the progress of the investigation.

The WRU will liaise with the CSO and/ or the senior Club Secretary when dealing with such cases, but will only share information when there is a safeguarding need.

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

## Temporary Safeguarding Measures

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

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

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

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

### Temporary Suspension Order (TSO)

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

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

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

If a TSO is issued this will either be reviewed periodically or if the WRU are notified that there are a change in circumstances. There is no appeal against a TSO.

### Temporary Conditional Suspension Order (TCSO)

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

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

## **Temporary Exclusion Order (TEO)**

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

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

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

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

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

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

If a TEO is issued this will either be reviewed periodically or if the WRU are notified that there are a change in circumstances. There is no appeal against a TEO.

## Case Management Panels

The purpose of the Case Management Panel is to ensure that all matters that are referred as safeguarding or child protection cases are dealt with in a fair, consistent, efficient, and effective manner and with a child centred approach.

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

Once all the necessary information has been gathered by the WRU Safeguarding Team, the matter will be referred to the appropriate safeguarding risk management panel i.e. CMP or SRG.

The role of the WRU Safeguarding Team is to assist and advise the SRG and CMP on safeguarding issues and provide recommendations and options for the panel to make the decisions in terms of actions or sanctions.

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

If there is evidence to suggest that there is a safeguarding disciplinary concern, then the matter will be referred to the appropriate panel. The WRU Safeguarding Team have no decision making powers, all decisions are made by the panel members as a collective decision. This provides an element of independence from the investigation either conducted by statutory agencies and/ or the WRU Safeguarding Team.

The welfare of the child or adult at risk will always be the paramount consideration. The WRU will assess the risk that is presented and any protective factors, and the SRG or CMP will base their decisions on the balance of probabilities.

The following cases are managed through the WRU Safeguarding Disciplinary Procedures. These will include cases that are referred to statutory agencies as multi or single agency investigations, and also WRU internal disciplinary investigations, which may lead to sanctions imposed through the Case Management Panel, Safeguarding Referral Group or Disciplinary Committee.

The Case Management Panel will deal with Category 1-3 investigations, and Category 6 cases (appeal against decision made by Safeguarding Referral Group). The Safeguarding Referral Group will deal with all Category 4 and 5 cases. The Independent Panel will deal with all appeals against decisions by the Case Management Panel (Category 7).



Category	Type of Investigation	Type of Offence/ Issue	Lead Agency/ Panel
1	Multi Agency Investigation	Serious Offences (i.e. allegations of abuse)	Police/ Social Services (monitored by WRU)
2	Single Agency Investigation	Serious or Mid-Range Offences (i.e. allegations of abuse, minor assaults etc.)	Police or Social Services (monitored by WRU)
3	Internal CMP Investigation	Serious risk and/ or high profile Misconduct matters	WRU Case Management Panel
4	Internal SRG Investigation	Low Level Misconduct or Poor practice cases (Code of Conduct matters)	WRU Safeguarding Referral Group
5	Internal Recruitment Investigation	Recruitment decision Risk to Children or Vulnerable Adults (Threshold Test)	WRU Safeguarding Referral Group
6	Appeal against Safeguarding Referral Group Decision	Appeal Hearing	Case Management Panel
7	Appeal against Case Management Panel Decision	Appeal Hearing	Independent Panel

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

### **No Further Action**

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

### **Written Warning**

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

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

### **Final Warning**

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

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

### **Educational and Learning Interventions**

This type of intervention would be applied where there is evidence of poor practice and the WRU decide that action should be taken. There may be an indication of a lack of competence, or it may be a minor ethical behaviour issue, that could be addressed through appropriate training, raising awareness or advice and guidance.

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

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

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

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

### **Deferred Conditional Suspension Order (DCSO)**

This sanction would be applied where there is evidence of poor practice, or a specific risk that can be managed appropriately without a suspension being issued.

The PSC is required to comply with conditions that are imposed. The suspension is deferred, and if the conditions are not complied with, in line within the required time line, it can be issued until those conditions are complied with.

An example of some of the conditions that could be applied are attending a coaching course, completing a full DBS risk assessment, rugby monitoring or supervision order



## Permanent Suspension Order (PSO)

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

## Permanent Exclusion Order (PEO)

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

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

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

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

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

## Monitoring and Supervision Order (MSO)

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

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

## Other Safeguarding related sanctions

The Case Management Panel also have the authority to implement any other safeguarding measures or sanctions that they feel is appropriate. However these decisions have to be justified and proportionate to the risk presented, again with the welfare of the child the paramount consideration.

When decisions are made and safeguarding measures are implemented or sanctions are issued, the reasons for these have to be recorded in writing in line with the WRU Case Management procedures.

## Misconduct Cases

These are matters that are investigated as a result of a Code of Conduct complaint. Safeguarding investigations may result in a breach of the Codes of Conduct and if it is felt appropriate, the matter can be dealt with by the Case Management Panel.

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

## **Disclosure and Barring Service**

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

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

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

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

## **Notification of Sanctions Issued**

The WRU will verbally notify the Person Subject of Concern of the outcome of a panel decision within 7 days, and they will receive written notification within 14 days.

The CSO will also receive written notification of the panel decision within 14 days.

## **Appeal Process**

There is a right of appeal against decisions made by both the SRG and the CMP as outlined previously.

Appeals against vetting or poor practice decisions made by the SRG are heard by the CMP, and appeal against a CMP decision are heard by an Independent Panel.

If the PSC wishes to appeal a decision then they must notify the WRU Safeguarding Team in writing within 21 days of the date of the letter notifying them of the sanction issued by the panel. The appeal should outline the grounds for their appeal and evidence on which they will rely at the hearing.

The Panel will be convened and a date agreed. The hearing will take place within 28 days of the appeal notification being received. However if there are exceptional circumstances then the hearing date can be outside of that time line. This decision will be made by the Appeal Panel in conjunction with the WRU Policy and Integrity Manager.

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

The WRU Safeguarding Team will be represented at the meeting, and will present the case to the panel, and the PSC will have the opportunity to present his/ her case and challenge any of the original decisions made by the panel.

The PSC will be notified of the outcome of the panel hearing verbally within 48 hours, and will be notified in writing within 14 days.

## Data Protection

During the process of a Safeguarding Disciplinary Investigation, the WRU will collect and share various pieces of personal data, which may include 'special category' personal data, belonging to both adults and children.

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

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

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

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

The WRU takes its obligations in relation to its handling and storage of personal information extremely seriously. More information about this can be found in the WRU Group's Privacy Policy, which can be found at:

**<http://www.wru.wales/eng/legal.php>**



## Media Interest

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

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

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

## Support Services

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

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

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

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



## Support for Clubs

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

Clubs should have the following in place to provide support to anyone who wants to report a concern –

- Safeguarding Policy (WRU Policy or a specific Club Policy)
- Club Safeguarding Officer (CSO – Children and Adults at Risk)
- Appropriate vetting procedures (DBS)
- CSO Poster in the club with contact details
- Codes of Conduct

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

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

WRU Rugby Operations Dept.

- WRU Safeguarding Team
- WRU Discipline Team
- WRU Coach Education Department
- WRU Community Rugby Departments

## Club Procedures for Managing Cases of Poor Practice

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

However if the CSO or the Club Management Committee feel that it is a safeguarding matter, then they should consult with the WRU Safeguarding Team, who will consider the initial report and decide whether this is a case which can be dealt with by the Club or whether it should be dealt with by the WRU.

If it has been decided that it can be dealt with at Club level then they will take responsibility to conduct the investigation. The Club Committee will have responsibility to appoint and convene the panel.

The following procedures provide some guidance as to how the matter should be dealt with:

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

- None of whom should have been involved in reporting the case or have a conflict of interest (i.e. a close friend of the individual who is subject to allegations)
- At least one of whom should be a Senior Management member from the Club
- If the complaint relates to a coaching matter, it is recommended that one member should have coaching experience
- If there is an independent person who can assist and be appointed as a panel member this will provide
- Increased independence and transparency in the process
- If there is an independent, legally qualified person available to assist and be appointed as a panel member then this should also be considered

The person against whom the complaint has been made should be:

- Informed of the nature of the complaint in writing
- Provided with a copy of any report or other information which will be considered by the Panel
- Be invited to attend the meeting which should be held at a convenient time for them
- Receive sufficient notice of the hearing
- Be given the opportunity to provide a verbal or written account and call witnesses
- Be allowed to hear or see evidence supporting the complaint; however minors should not be required to give evidence in person and can provide evidence in writing. There may also be information which is confidential to the complainant or where the source has requested anonymity for fear of retribution
- Be allowed to have representation at the meeting

The Disciplinary Panel should ensure that the matter is considered in a fair and objective manner, and that the person about whom the complaint has been made, should have the opportunity to present their case.

The Panel should consider all of the relevant information, and make a decision that is justified and proportionate to the matter that has been investigated and discussed. The standard of proof in all disciplinary cases are the balance of probabilities.

The Panel should provide a written record of their decision and any sanction issued, and should also provide a rationale for their decision.

When the Panel has reached a decision it should:

- Inform the person subject to investigation and put the decision in writing
- Ensure that any action decided is completed
- Inform the WRU in writing

It is recommended that a club should have an appeals process in place, but that is a decision for the Club Management Committee. The WRU are able to provide advice and guidance regarding any disciplinary matters, but all decisions should be made independently by the club.



**SAFEGUARDING  
KIT BAG  
PRACTICAL GUIDANCE**



## **SAFEGUARDING KIT BAG - PRACTICAL GUIDANCE**

There is various practical guidance provided in this section but further information is available through the Child Protection in Sport Unit and Ann Craft Trust websites:

**<https://thecpsu.org.uk>**

**<https://bit.ly/30wIJU2>**

1. Volunteer Workforce - Appropriate Conduct
2. Managing Overnight Stays and Emergency Planning
3. Accommodation
4. Overnight Stays Checklist
5. Hosting
6. Supervision Ratios
7. Changing Facilities
8. Transport
9. Late Collection of Children
10. Safeguarding in Disability and Mixed Ability Rugby
11. Physical Contact
12. Managing Challenging Behaviour
13. Responding to Medical Issues
14. Managing Concussion
15. Photography and the Use of Images
- 16. Photograph/ Video Consent Form**
- 17. Filming for a Coaching Purpose Consent Form**
18. Social Media



## VOLUNTEER WORKFORCE – APPROPRIATE CONDUCT

It is important that everyone within the rugby environment is clear about what is considered appropriate conduct when working with children. All staff, members and volunteers must promote good practice and ensure poor practice is challenged. Adhering to the following principles will also help avoid positions where both the responsible adult and the child are vulnerable and create a positive environment within the sport:

- Always ensure that there is at least one other responsible adult present during training sessions
- Treat all children fairly, and with respect and dignity
- Always put the welfare of each child first, before winning or achieving goals
- Maintain appropriate boundaries in relationships with children, and do not engage in sexual relationships with young people where you are in a position of trust in relation to them
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process
- Make sport fun, enjoyable and promote fair play
- Ensure that if any form of manual/physical support is required, it is provided openly and according to coach education guidelines. Care is needed, as it can be difficult to maintain appropriate hand positions when a child is moving. Young people and their parents should always be consulted and their agreement gained
- Keep up to date with technical skills, qualifications and insurance in sport
- Ensure parents/carers understand what is expected of them e.g. that they accept responsibility for transporting their child to and from the sport activity, and for bringing and collecting their child on time
- Request written parental consent if club officials wish to organise group transport to an event
- Always ensure parents, teachers, coaches or officials work in pairs if supervising young people, particularly in changing areas
- Ensure that at competitions or residential events, adults should not enter children's rooms or invite children into their rooms
- Be a positive role model - this includes not smoking or drinking alcohol in the company of young people
- Give enthusiastic and constructive feedback rather than negative criticism
- Recognise the developmental needs and capacity of young people, avoiding excessive training or competition and not pushing them against their will
- Secure parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment
- Keep a written record of any injury that occurs, along with the details of any treatment given



## **MANAGING OVERNIGHT STAYS AND EMERGENCY PLANNING**

Those responsible for organising overnight stays should establish the purpose of the trip, confirm the dates, location, and duration. You should also conduct a risk assessment, and have an emergency contingency plan, and the Team Manager should take responsibility to manage this plan.

The trips can vary from travelling to play local sides to travelling further afield in this country or abroad as part of an organised rugby tour, festival or event. Obviously if they are travelling as part of an organised tour they are likely to be staying overnight.

When taking young people away from the home club, there is a need to consider how we manage our duty of care for the children or young people in the team. The first action should be to appoint a responsible adult with clear roles and responsibilities to manage this process, this is usually the role of the Team Manager.

Initial considerations should include:

- Purpose of the trip.
- Who will be going, children? Staff?
- How much will it cost? How much spending money is required?

If the group i.e. Club, School etc. are going on tour outside Wales then they must seek the permission of the WRU.

The following provides good practice guidance for issues to consider when taking teams on an away fixture for the day or overnight:

- Produce an itinerary giving as much detail as possible
- Establish what insurance cover is required
- Ensure you have sufficient staff to manage and look after the children and young people
- Ensure that you consider the catering needs of the children and young people
- Obtain written permission from the parents/guardians or carers for transporting and supervising
- Ensure that there are emergency contact numbers for all the team and staff
- Ensure that the Team Manager is aware of the WRU Safeguarding Policy and guidance on these issues
- Ensure children and staff are briefed on the standards of behaviour and the codes of conduct
- Ensure there is clear lines of communication with all parties involved
- Ensure all staff responsible for the children have been DBS checked to the appropriate level (Enhanced)
- Ensure that there is a club contact available i.e. a member of the club who is not travelling away, who will act as contact point if required. (The CSO or a Club Official may be an appropriate person to fulfil this role)

It is good practice to use an Overnight Stay Checklist to ensure that the various safeguarding and organisational issues are managed effectively (see page)

It is extremely important that the plans are communicated to various people within the club:

Children should be aware of the travel plans, venue and time for collection, time of return and any costs. Children should also have a clear understanding of what standard of behaviour is expected of them. They will also need to know what sports kit or equipment they need to bring.

**Parents** should be made aware of the above and must have completed a consent form detailing any medical issues that the Team Manager should be aware of. Parents should also have the name and contact details of the Team Manager in the event of an emergency.

**Other coaches / volunteers** need to be made aware of what their responsibilities are in advance of the trip. If the trip is a long journey, it is important that all coaches / volunteers have an itinerary.

The recommended ratio of adults to children is:

- Children under 8 years old

One adult to six participants (with a minimum of two adults)

- Children between under 9's to under 13's

One adult to eight participants (with a minimum of two adults)

- Children between under 14's to Youth Rugby

One adult to ten participants (with a minimum of two adults)

At least one of the Coaching and Management Team should be a trained first aider, and a first aid kit should be available. The Team Manager must have access to a mobile phone and contact details for all the children, and parents/ guardians.

There will need to be suitable venues and facilities identified for both fixtures and accommodation.

If any child is hospitalised whilst away on tour or on an overnight stay, or if there are any complaints regarding any issue whilst away, the WRU Safeguarding Team should be notified as soon as possible

## ACCOMMODATION

Whatever the accommodation, the Team Manager should ensure that the children are safe. Discuss your code of conduct and discipline policy with the staff at the accommodation. All children must know which room(s) staff are in and how to contact them if required.

If rooms are equipped with satellite TV, inappropriate programmes may be available. It may be possible to have these programmes disconnected.

Check the accommodation policy for extras on bills, breakages and lost keys.

All accommodation must be clean and with access to sufficient toilet and bathing facilities. It is not acceptable for:

- Children to share a bed
- Male and female children to share a room
- Staff to share a room with children

Checks must be made to ensure that the needs of children with disabilities are met. For wheelchair users, it is important to check access to the building, room and bathroom facilities.

There is further guidance available on the Child Protection in Sport website (Safe Sports Event Tool):

**<https://thecpsu.org.uk/event-management>**

## OVERNIGHT STAY CHECKLIST

### Safety Check List

Overnight trips and/or travel abroad

Purpose of the Trip

- Competition
- Training
- Social
- Other (specify)

### Planning

- When
- Where
- Who (staff / volunteers / participants)
- Risk assessment of activity

### Communication with parents

- Destination, sport and accommodation details (address / telephone)
- Name/number of lead club/school link or team manager
- Drop off/pick up times
- Transport arrangements
- Competition details
- Kit and equipment list
- Emergency procedures, home contact
- Consent form
- Information re medical conditions (including allergies) or impairments, and medication
- Code of conduct
- Safeguarding arrangements (reporting concerns, supervision etc.)
- Process for parent contacting coach or young person
- Process for young person contacting parent

### Transport

- Drop off/pick up times
- Journey times and stopping points
- Supervision
- Suitability and accessibility
- Drivers checked
- Insurance

## **Accommodation**

- Type (hotel, hostel, hosting, camping etc.)
- Pre-event visit and risk assessment made
- Catering, special diets, food allergies
- Suitability for group, including accessibility
- Room lists
- Supervising adults' sleeping arrangements

## **Preparing athletes**

- Expectations on dress and behaviour
- Food and drink
- Currency
- Telephones
- Maps of area

## **Supervision and staffing**

- Ratio of staff to athletes
- Male/female
- Cover for all in-sport and free time periods
- Specialist carers
- Clear responsibilities

## **Documentation**

- Travel tickets
- Passports, visas
- Check non EU nationals
- Accommodation and travel booking documents

## **Insurance**

- Liability
- Accident
- Medical

## **Emergency procedures**

- First aid
- Specific medical information available
- Access to and administration of medication
- Information on local emergency medical services, hospitals etc.
- EHIC European Health Insurance Card (replacement for E111) form completed (EU visits)

## **Financial - Cash**

- For travel
- Payment schedule – deposit, staged payment
- Extra meals, refreshments
- Spending money
- Security

## **Arrival**

- Check rooms, meal times, phones, valuables
- Check sporting venues
- Collect in money, valuables
- Information on medications
- Arrange group meetings
- Confirm procedures with staff
- Rules (e.g. curfews)

## HOSTING

Being a host family or being hosted is an integral part of many sports and, if handled appropriately, can add to a child's enjoyment and experience. This is another issue similar to going on tour or having an overnight stay that needs to be planned and managed effectively. We need to ensure that parents, children and hosts are reassured that there is a plan that considers the welfare and needs of all involved.

It is a significant responsibility and it can be a particularly challenging role, but also very rewarding. The host should be provided with as much information about the child staying with them and details of any competitions or events that they may be attending whilst they are there.

There is a need to ensure that hosts consent to being appropriately vetted, and the appropriate procedures are followed and processed as expeditiously as possible. If children are staying with them overnight and are supervised by them they will need to have a valid DBS certificate in line with the definition of 'Regulated Activity'.

When arranging for events/trips abroad, the Club or Governing Body will be dependent on the ability of the host organisation to access vetting services and obtain appropriate references. It is still the responsibility of the trip organiser to provide the hosts with the relevant information on the child and details of what is expected in terms of safeguarding.

If people are hosting, they need to have agreed to a Code of Conduct and provide a safe and supportive environment for the children while they are hosting them. It is important that children have a positive experience when staying away from home and possibly experiencing a different culture.

Children have a responsibility to be respectful to their host families, or when touring as representatives of their club or school. It is important that they report any inappropriate behaviour or concerns to the Team Manager or another member of the Coaching Team.

They should understand their responsibilities and adhere to any guidance and the Codes of Conduct, as they are acting as an ambassador for their sport and on occasions, their country.



## SUPERVISION RATIOS

It is essential that appropriate ratios for supervision are adopted and everyone is clear of their supervisory responsibilities.

Ratios of adults to children should be determined by considering age, the nature of the activity and where it is taking place. For events away from the regular club training venue there should be a higher ratio of adults to children. This ratio should be increased for children under the age of eight. This will minimise any risks to children, enhance the benefits of the activity, reassure parents and guardians, and ensure that staff are appropriately supported.

The recommended ratio of adults to children is:

- Children under 8 years old:
- One adult to eight participants (with a minimum of two adults, one of the same gender)
- Children over 8 years old:
- One adult to ten participants (with a minimum of two adults, one of the same gender )

There are a number of key principles that need to be considered:

- Ensure that the staff/ coaches etc. are subject to appropriate vetting procedures i.e. DBS checks, and that the appropriate risk assessments are conducted based on this information
- Ensure that there is appropriate insurance in place
- Ensure that all staff and participants are briefed regarding the codes of conduct
- Ensure that coaches have the appropriate coaching qualifications
- Ensure that the coaching and management team are fully aware of their responsibilities to safeguard children

On all occasions, there must always be a minimum of two responsible adults present. This ensures there is supervision in the event of an accident or incident that requires one of the adults to leave the group to accompany a child.

There are some coaches who are not 18 years of age, and although they may be suitably qualified and vetted, they should not be relied upon to have responsibility for safeguarding issues. They should be allowed to develop their sense of belonging and responsibility rather than depending upon them to take full responsibility for managing a group of children. They can only supplement the adult coaches supervising the activity.

When planning activities, a risk assessment should be conducted which informs decision making about appropriate levels of supervision. Key factors to consider in this assessment:

- Age of children
- Additional supervision/ support needs of some or all participants (i.e. due to disability)
- Competence/ experience of specific activity
- Nature of activity
- Nature of venue

The WRU encourage parents/ guardians/ carers to accompany and support their children in their rugby activities.

However we do not recommend that in planning or providing such activities that parents/ guardians/ carers are considered in the ratio calculation of adults to children, unless they are acting in a formal volunteering capacity. In these circumstances the following issues should be considered:

- Ensure that they are subject to appropriate vetting procedures i.e. DBS checks, and that the appropriate risk assessments are conducted based on this information
- Clarity about their role
- Who has overall responsibility for the group
- What is acceptable practice

It is important that there is an adequate number of 'staff to children' ratio on any away trip or tour. To ensure the safety of the team, consideration needs to be given to the following:

- Gender, age ethnicity and ability of the team
- Children with special needs, medical requirements or with disabilities
- The duration of the journey
- The competence and likely behaviour of the children
- The number of team managers, assistants, coaches and specialist staff
- The experience of the staff supervising young people
- The need for enough staff to deal with an emergency (minimum of 2)
- The minimum requirement of a ratio of 1:10 for a team of over 8 year olds
- The need for the ratio to be increased for young players, depending on the above factors and considerations
- The minimum requirement of ratio 1:8 for a team of 8 year olds and under
- Communication with parents

The following information must be clarified and communicated to parents and the team when travelling to a fixture for the day:

- Method of transport
- Pick up point(s)
- Time of departure and return
- Destination and venue
- Competition details
- Name and contact details of Team manager and coaches responsible for the teams on the day
- Contact details and any medical requirements for the members of the team
- Kit and equipment list and requirements
- Cost implications i.e. cost of transport, competition fee and pocket money required

Information required from parents/guardians/carers:

- Signed consent form accepting the code of conduct and detailing any specific medical information
- Signed photographic consent form
- Special dietary requirements
- Consent for emergency medical treatment
- Agreement to pay the fee

## CHANGING FACILITIES

Rugby clubs, and those with responsibility for safeguarding children and young people have a general duty of care towards them. However there are no specific legal requirements regarding the use of changing facilities. This guidance applies to both children and adults at risk.

This is intended as practice guidance to support individuals and organisations to consider issues relevant to their particular context; and to develop and implement policies and procedures that provide a safe and positive environment.

It is recognised that there are a number of risks specific to changing facilities, ranging from health and safety to supervision ratios. The purpose of this guidance is to identify and promote best practice and to minimise these risks.

The presence of unsupervised children, particularly in open changing or shower areas, can cause concern for volunteer staff and members of the public. Changing room facilities at rugby clubs or leisure facilities need to be properly supervised. The use of changing facilities can be difficult to regulate where training venues are open to the public and may be mixed gender.

Supervision in the changing facility may also be necessary when children are too young to be left alone or change themselves. Organisers of groups of children under eight years should make arrangements for their supervision while changing before and after the activity.

Although most children of school age (four years old) may be capable of changing their clothes, many sports and leisure facilities have established guidelines that any child below the age of eight years must be accompanied. The group includes disabled children who require additional support and assistance with changing (note this should be undertaken with prior agreement from their parent or professional carer)

If you have decided that the children and young people need supervision, staff/volunteers should consider who will carry this out. This task provides access to children in circumstances of increased vulnerability and therefore careful consideration should be given to ensure that those undertaking this task have been assessed as being suitable to do so.

It is important to conduct the appropriate vetting checks i.e. DBS checks, and ensure that staff are aware of the guidance in this policy.

The WRU recognise that Youth Rugby is played within the age range of 16-19 years, so there will be adults sharing a changing room with children. The players are part of the same peer group and those over 18 years of age are not in a position of trust, as they are part of the same team. In these circumstances it is accepted that 16 and 17 year olds will be sharing a changing room with 18 or 19 year olds, and this should be managed appropriately by the Team Manager or Coach.



## TRANSPORT

The Team Manager is responsible for the team and staff at all times including maintaining good discipline, and is also responsible for the logistical issues that need to be addressed in terms of transport and safety, particularly if the club are providing their own driver(s).

In addition to the mini-bus/car insurance, the Team Manager also needs to ensure that the Club's general insurance covers travel to away events. There is also a need to ensure that the vehicle is covered for breakdown and recovery.

The following issues need to be considered:

- Ensure the competence of the driver, and check that he/she has an appropriate and valid driving licence
- Allow an appropriate length of time to complete the journey
- Number of driving hours for the journey and length of the driver's day including non-driving hours
- Drivers need to take breaks and be aware of emergency procedures
- Consider the impact of traffic and weather conditions
- If using a mini-bus ensure that all seats are forward facing and they all have seat belts fitted if carrying children. Is the driver experienced in driving a mini-bus?
- Ensure all occupants and children wear seat belts
- Check there is appropriate insurance cover
- Clarify supervision requirements with the Coaching and Management Team. The driver should not be considered as a supervisor during the journey
- Ensure that the vehicle is road worthy
- Ensure that the driver has undertaken an AccessNI check
- Ensure the appropriate booster seats or specialised equipment are provided where required
- All team members and staff are familiar with emergency procedures within the vehicle i.e. emergency door

### Transport Supervision

The recommended ratio of adults to children is:

- Children under 8 years old

One adult to eight participants (with a minimum of two adults)

- Children over 8 years old

One adult to ten participants (with a minimum of two adults)

However as outlined the driver cannot supervise children whilst driving, so you would need to increase the numbers in this case.

## Private Car Usage for Transport

Clubs usually require private cars to be used to transport young people from within the club.

If this is the only method of available, the following guidelines must be adhered to:

- Drivers must register their vehicle with the Club
- Drivers must ensure the safety of all passengers
- Drivers must ensure that their vehicle is road worthy and that they have a valid licence and insurance cover
- Drivers must only use vehicles with seat belts and ensure that their passengers are wearing these whilst in transit
- Parents/guardians/carers must give their written permission if their child/children is to be transported in another adult's car
- Clear information on expected departure/arrival time needs to be communicated to the relevant people i.e. parents/guardians/carers
- Drivers should not be alone with a young person in the car at any time. If an emergency situation arises, drivers need to ensure that the young person is in the back of the car
- If the driver regularly provides transport for children i.e. on a weekly basis or four times a month, then they may need to be DBS checked (seek advice from the WRU Safeguarding Team if you're unsure)

## LATE COLLECTION OF CHILDREN

Late collection of children by parents/carers can be challenging for sports officials/ volunteers/Clubs to manage. One way of addressing this issue is to stress the need for parents/carers to ensure they arrive on time at the end of a session.

However, it is appreciated that there are some circumstances beyond the control of the parent/carer that may make it impossible to collect their child on time. Whilst it is not the responsibility of coaches and officials to transport children home on behalf of parents/carers who have been delayed, clubs should adopt the following measures to ensure children are safeguarded:

- Ask parents to provide an emergency contact name and number
- Provide parents/carers with a contact number for the club and an instruction to call if there is any likelihood of late collection
- Attempt to contact the child's parent/carer or, if necessary, the emergency contact
- Ensure that two adults remain with the child at the facility until the parent/carer arrives
- If appropriate, remind parents/carers of the policy relating to late collection
- The child should not be sent home with another person without permission from a parent/carer.

## SAFEGUARDING IN DISABILITY AND MIXED ABILITY RUGBY

### Practical Guidance

The WRU believe that rugby union is a game for everyone in Wales, and are committed to ensuring that everyone has a positive rugby experience.

The WRU are committed to ensuring that community rugby is inclusive for adults at risk and disabled people, and that WRU staff and the wider rugby community are supported and up-skilled to adopt a more inclusive approach to rugby.

Although all existing safeguarding issues arise within the formats played by those participants with disabilities there are some scenarios that are unique to this environment where coaches, volunteers and support staff need to be aware of best practice, for example:

If a young wheelchair rugby player has been hit over in her chair, not only should the coaches be aware of the type of disability that the player has. When righting the player they should ask permission should they need to have physical contact (placing their hands on them). Where at all possible those righting a player should only place their hands on the chair.

A number of Mixed Ability Rugby players have carers who are either employed or family members. These carers will assist players getting changed before and after matches, and consideration must be given to this as you may be dealing with adults at risk. It is also not uncommon for carers to be assisting, in this case players with carers of a different gender should make use of the changing facilities when vacant, such as ten minutes before the final whistle when communal changing rooms are only available.

Working with children, young people and adults at risk with a wide range of disabilities can be challenging, especially if you are trying to engage with them initially as a coach. Many participants respond well to a more tactile approach like a hand on the shoulder when the coach is speaking to that individual. Not only should the coach speak to the parent, teacher or carer for permission prior to the session starting but also it is important to get a parent/teacher/carer perspective, some participants can respond aggressively to touch, so it is worth having that understanding.

Please see the below links to the Disability Strategy in English and Welsh

<https://bit.ly/2SaWrrq>

<https://bit.ly/2Sad5HL>



## PHYSICAL CONTACT

The use of physical contact in rugby is important to support the development of skills and techniques, to treat injury or prevent an injury or accident from occurring. Physical contact during participation in rugby should always be intended to meet the child or the adult at risk's needs.

It is important to be open and transparent about physical contact as it is possible that legitimate contact between an adult and a child or adult at risk may be misconstrued or misunderstood by them or by observers.

The following guidance should be applied in respect of any physical contact with children or adults at risk:

- Ensure, in situations where physical contact is necessary to assist with learning, the person explains to the child or adult at risk, the nature and reason for the physical contact, and unless the contact arises in an emergency and to prevent harm, ask the child for permission
- Avoid over handling when assisting a child or adult at risk
- Ensure any physical contact takes place in an open or public environment and does not take place in secret or out of sight of others
- Avoid any unjustified or unnecessary physical contact
- Include guidance on physical contact as part of an induction process or pack for new participants, and ensure that parents, guardians or carers are briefed appropriately
- Ensure children or adults at risk with disabilities who need to be lifted or manually supported are treated with dignity and respect. Relevant health and safety guidelines must be followed to ensure the safety of the individual and those assisting. It is recommended that those assisting receive appropriate training
- Ensure that any sport science or medical practices or other roles where physical contact is common place and/or a requirement of the role is only carried out by trained or qualified practitioners
- Contact should not involve touching genital areas, buttocks, breasts or any other part of the body that might cause a person distress or embarrassment
- Any form of physical punishment of children or adults at risk is unlawful, as is any form of physical response to misbehaviour unless it is by way of physical intervention to prevent a person from harming themselves or others or damaging property
- Encourage children and adults at risk to voice concerns in the event that any physical contact makes them feel uncomfortable or threatened

There may be occasions where children are distressed and in need of physical comfort and reassurance. A coach or other volunteer may also want to mark a success or achievement with a hug or other gesture.

Individuals should use their discretion in such cases, being led by the needs of the subject person and ensure that what is (and what is seen by others present) normal and natural does not become unnecessary and unjustified contact, particularly with the same young person or adult at risk over a period of time.





## MANAGING CHALLENGING BEHAVIOUR

Staff and volunteers who are involved in coaching activities with children or adults at risk may, on occasions, be required to deal with challenging behaviour.

The WRU are committed to developing good practice and to encourage a proactive response to supporting people to manage their own behaviour.

They suggest some strategies and sanctions which can be used and also identify unacceptable sanctions or interventions which must never be used by staff or volunteers.

The WRU strategy on dealing with the issue of challenging behaviour is based upon the following principles:

- The welfare of the child or adult at risk is the paramount consideration
- All those involved in activities should understand and be clear on the standards of conduct, and the process for responding to behaviour that is deemed unacceptable
- Children or adults at risk must never be subject to any form of treatment that is harmful, abusive, humiliating or degrading
- Some people exhibit challenging behaviour as a result of specific circumstances, i.e. a medical or psychological condition, and coaches may therefore require specific or additional guidance. These and any other specific needs the person may have should be discussed with parents, guardians or carers and the person involved in planning for the activity, to ensure that an appropriate approach is agreed and, where necessary, additional support provided
- Sport can make a significant contribution to improving the life experience and provide positive outcomes for everyone. Every child or adult at risk should be supported and encouraged to participate and, only in
- Exceptional circumstances where there is a safety issue, that cannot be appropriately managed, should a person be excluded from club activities

Good coaching practice requires effective planning around the needs of the group, but also needs to take into consideration the needs of each individual athlete within that group. When planning any sessions, coaches should consider whether there has been any previous difficulties for any members of the group, in relation to the tasks involved, the other participants or the environment.

Where staff/volunteers identify potential risks, strategies to manage those risks should be agreed in advance of the session, event or activity. The planning should also identify the appropriate number of staff or volunteers required to safely manage and support the session including being able to adequately respond to any challenging behaviour and to safeguard other members of the group and the staff/volunteers involved.

When people are identified as having additional needs or behaviours that are likely to require additional supervision, specialist expertise or support, this should be discussed with

Parents, guardians or carers, and the person involved if appropriate. It's important that a person centred approach is taken and that individual needs are catered for.

The club should seek to work in partnership with parents, guardians and carers, and where necessary external agencies, to ensure that a child or adult at risk can be supported to participate safely.

Staff, volunteers, children, young people, adults at risk and parents, guardians and carers should all be involved in developing an agreed statement of what constitutes acceptable and unacceptable behaviour (code of conduct) and the range of sanctions which may be applied in response to unacceptable behaviour. This can be done at the start of the season, in advance of a trip away from home or as part of a club induction process.

Issues of behaviour and control should regularly be discussed with the appropriate people in the context of rights and responsibilities. When people are specifically asked as a group, to draw up a code of conduct that will govern their participation in club activities, experience indicates that they tend to arrive at a very sensible and working set of 'rules' with greater 'buy-in' from participants.

## Response to Managing Challenging Behaviour

When responding to challenging behaviour the response should always be proportionate to the actions, be imposed as soon as is practicable and be fully explained to the child or adult at risk, and their parents, guardians and carers. In dealing with people who display negative or challenging behaviours, staff and volunteers might consider the following options:

- Time out - from the activity, group or individual work
- Reparation - the act or process of making amends
- Restitution - the act of giving something back
- Behavioural reinforcement - rewards for good behaviour, consequences for negative behaviour
- De-escalation of the situation - talking it through with the person concerned
- Increased supervision by staff/volunteers
- Use of individual 'contracts' or agreements for their future or continued participation
- Sanctions or consequences e.g. training/ playing / missing an outing
- Seeking additional/specialist support through working in partnership with other agencies to ensure that a person's needs are met appropriately
- Temporary or permanent exclusion. Every appropriate option should be explored before anyone is permanently excluded
- Particular care should be taken to manage any issues as there may be complex needs

The following should never be permitted as a means of managing a child or adult at risk's behaviour:

- Physical punishment or the threat of such
- Refusal to speak to or interact with the person
- Being deprived of food, water, access to changing facilities or toilets or other essential facilities
- Verbal intimidation, ridicule or humiliation

Staff and volunteers should review the needs of any person for whom sanctions are frequently necessary. This review should involve all of the relevant people involved, and in some cases others involved in supporting or providing services for the person and his/her family. This should ensure that an informed decision is made about the person's future or continued participation. As a last resort, if a person continues to present a high level of risk or danger to him or herself, or others, they may have to be excluded or suspended from any activities.

## Physical Intervention

The use of physical intervention should always be avoided unless it is absolutely necessary to prevent a child or adult at risk injuring themselves or others, or causing serious damage to property. All form of physical intervention should form part of a broader approach to the management of challenging behaviour.

Physical contact to prevent something happening should always be the result of conscious decision making and not a reaction. Before physically intervening, the member of staff or volunteer should ask themselves, 'Is this the only option in order to manage the situation and ensure safety?'

It is good practice to ensure that if you have to physically intervene in a situation with a child, young person, or adult at risk, it is in the least restrictive way necessary to prevent them from getting hurt, and used only after all other strategies have been exhausted.

The following must always be considered:

- Contact should be avoided with buttocks, genitals and breasts.
- Staff/volunteers should never behave in a way which could be interpreted as sexual
- Any form of physical intervention should achieve an outcome that is in the best interests of the person whose behaviour is of immediate concern
- Staff/ volunteers should consider the circumstances, the risks associated with employing physical intervention compared with the risks of not employing physical intervention
- The scale and nature of physical intervention must always be proportionate to the behaviour of the person and the nature of harm/ damage they might cause
- All forms of physical intervention should employ only a reasonable amount of force i.e. the minimum force needed to avert injury to a person or serious damage to property applied for the shortest period of time
- Staff/volunteers should never employ physical interventions which are deemed to present an unreasonable risk to people or staff/volunteers
- Staff/volunteers shall never use physical intervention as a form of punishment
- Physical intervention should NOT involve inflicting pain
- Where people are identified as having additional needs or behaviours that are likely to require physical
- Intervention this should be discussed with parents, guardians or carers and where necessary the club will seek advice from or to work in partnership with external agencies to ensure that the person can be supported to participate safely. This may include asking for the provision of a suitably trained support worker/volunteer or accessing staff/volunteer training in physical intervention
- Any physical intervention used should be recorded as soon as possible after the incident by the staff/volunteers involved using the Incident Report Form and passed to the CSO

## Child Centred Approach and the Views of the Child

Research indicates that the use of physical intervention provokes strong feelings in children and young people. Children may be left physically or emotionally hurt as a result of this, and as outlined it should always be avoided unless necessary to prevent a child from harm.

Children who haven't been directly involved in the situation may be fearful that it will happen to them in future or have been upset by seeing what has happened to others.

If there is an incident where physical intervention has been used, there should be a de-brief conducted for staff/volunteers, the child and the parents. One of the primary considerations here is to ensure that any welfare or medical issues are addressed as a priority. The physical and emotional well-being of those involved should be addressed and ongoing support offered where necessary. Staff/volunteers, children and parents should be given an opportunity to talk about what happened in a calm and safe environment.

There should also be a discussion with the child and parents about the child's needs and continued safe participation in the group or activity. It is important that staff and volunteers are made aware of and understand the organisation or club guidance about managing challenging behaviour to ensure that they are aware of ways in which they may need to intervene and are clear about the practice guidance in this area.



## RESPONDING TO MEDICAL ISSUES

Sports organisations have a duty to be inclusive and to provide opportunities for children and young people of all abilities, regardless of any medical conditions, disabilities or allergies which they may have.

The CPSU provide guidance for Team Managers or Coaches in managing these issues, as they have a responsibility to ensure their welfare is catered for whilst in a rugby environment, and particularly when training or playing. Please see the link below.

**<https://bit.ly/2JBmzla>**

However, it is equally important that children with medical conditions or allergies are not unnecessarily excluded from taking part in activities with their peers and that reasonable steps are taken to accommodate their individual needs.

### Medical Issues – Parental Responsibility

When children or young people join a rugby club, parents/carers should -

- Brief the Team Manager, Coach or First Aider about the specific needs of their child and how to address and accommodate these needs (i.e. medical issues etc.)
- Update the Team Manager, Coach or First Aider regarding any change in circumstances
- Consider a medic alert bracelet/watch for their child
- Check the expiry date of any medication regularly.
- Ensure that if the young person has a 'rescue pack' that, if necessary, this is given to the Team Manager, Coach or First Aider. This may include antihistamines for mild reactions, possibly an inhaler and may have adrenaline injectors for more serious reactions e.g. anaphylaxis

The more information made available to organisations the more the child or young person's needs can be catered for to ensure they reach their potential. Consent should be gained on an annual basis from parents, who should be given the opportunity to update information should the need arise.

If the child is attending a rugby festival or event, then the Team Manager or Coach must ensure that he/she is in possession of all the registration cards for the children where any allergies are documented. They should also ensure that medical staff are briefed regarding these issues. The Team Manager, Coach or First Aider should know where the nearest hospital is, in case it is required.

If you are providing food for the children, make sure that those with allergies are able to be included as much as possible and if they can't that a suitable alternative is found, ask parents/carers for a suggestion. If eating out with the group, parents may be able to recommend somewhere to eat that caters for their child's needs.

## Medical Issues – Coaching and Management Teams

The Team Manager, Coach and First Aider should agree who is to be the responsible person in terms of managing medical issues (any could be the responsible person), as they have a duty of care in relation to children and young people in Welsh Rugby. The duty of care means that the club needs to take such measures as are reasonable in the circumstances to ensure that individuals will be safe to participate in an activity to which they are invited to or which is permitted.

There is no general duty of care upon members of the public towards the public at large. If there is a formal relationship, however, for example between a club and a club member or a coach and an athlete, there is a duty of care. When children and young people are involved in organised sports activities and are to any extent under the care and/or control of one or more adults, the adult(s) have a duty to take reasonable care to ensure their safety and welfare.

### The duty occurs in two ways:

#### A Legal Duty of Care

#### A Moral Duty of Care

The Legal Duty of Care has a strict definition. The most obvious example of this is in health and safety procedures where clear guidance is provided about what reasonable steps should be taken to minimise the hazards related to activities, substances or situations. Liability for the legal duty of care would only arise when an incident occurs and it can be demonstrated that the risk was foreseeable but no action had been taken to remedy it.

The Moral Duty of Care is more correctly a responsibility for safety and welfare, a responsibility for those children and young people and other staff/volunteers that are under their control.

To determine if a breach of the duty of care has occurred, the ordinary civil law of negligence would be applied. The question is whether the person with responsibility in acting, or omitting to act, has failed to reach the standard of a reasonable person.

Team Managers, Coaches and First Aiders should be made aware of any allergies or other medical issues, by the child's parent or guardian. It is important that they are briefed on this issue, and they also need to communicate directly with the child or young person.

If there is a care plan in place they should be made aware of any of the details so that the staff can ensure that they manage the safety and welfare of children appropriately. They should also agree on who this information can be shared with (do the right people know?).

If there is an incident where a child is taken ill then this should be recorded on the Incident Report Form, and any concerns should be documented accordingly. It is important that the responsible person has access to a mobile phone which is charged and with signal to allow calls to be made.

## MANAGING CONCUSSION

The WRU have a policy in relation to managing concussion named 'Recognise and Remove'

Listed below are some facts about concussion:

- Concussion is a brain injury
- All concussions are serious
- Concussion can often occur without loss of consciousness
- Players with any signs or symptoms of concussion must be immediately removed from playing or training
- Players must not return to play on the same day of any suspected concussion
- All players with concussion should be referred to a medical practitioner
- All players with concussion should follow a return to play protocol as per the WRU guidance document <https://bit.ly/2LiwkR>
- Players must not return to full contact sport until cleared by a medical practitioner
- Most concussions will recover with physical and mental rest
- Children and adolescents may take longer to recover following concussion
- Concussion can occur without an obvious blow to the head
- Recognise and Remove players with concussion to prevent further injury or even fatality

### What is Concussion?

- Concussion is a traumatic brain injury resulting in a disturbance of the brain's function
- There are many symptoms of concussion. Common ones include headache, dizziness, memory disturbance and balance problems
- Loss of consciousness or being knocked out occurs in less than 10% of concussions
- Loss of consciousness is not a requirement when diagnosing concussion
- A brain scan will usually be normal

### What causes Concussion?

Concussion can be caused by a direct blow to the head, but can also occur when blows to other parts of the body result in rapid movement of the head (e.g. whiplash type injuries).

### Who is at risk?

Concussion can happen at any age and to anyone. However, child and adolescent players\*:

- Are more susceptible to concussion
- Take longer to recover
- Have more significant memory and mental processing issues
- Are more susceptible to rare and dangerous neurological complications, which in some circumstances could be fatal due to brain swelling (known as second impact syndrome)

**\*Child and adolescent players are defined as under the age of 19 years old as of the 1st of September.**

## Recurrent Concussion

All players who suffer two or more concussions within a year are at greater risk of further brain injury and slower recovery. These players should seek medical attention from practitioners specialising in concussion management (i.e. Neurologists or Neurosurgeons) before returning to play or undertaking contact practice.

### Onset of Signs and Symptoms

Signs and symptoms of concussion can appear at any time but typically become evident in the first 24–48 hours following a head injury.

### Recognise and Remove a Concussed Player

If any of the following signs or symptoms are present following an injury, the player should be suspected of having concussion and recognised and removed from play or training.

Players must not return to play or training on the same day of a suspected concussion.

### Signs of concussion – What you see:

- Dazed, blank or vacant look
- Lying motionless on the ground / slow to get up
- Unsteady on feet / balance problems or falling over / loss of coordination
- Loss of consciousness or unresponsiveness
- Confused / not aware of plays or events
- Grabbing / clutching of head
- Seizure (fits)
- Nausea or vomiting
- More emotional / irritable than normal for that person

### Symptoms of concussion – What you are told:

- Headache
- Dizziness
- Mental clouding / confusion / or feeling slowed down
- Visual problems
- Fatigue
- Drowsiness / feeling like “in a fog” / difficulty concentrating
- “Pressure in head”
- Sensitivity to light or noise





The following memory questions are commonly used to assess whether a player may be concussed:

- *“What venue are we at today?”*
- *“Which half is it now?”*
- *“Who scored last in this game?”*
- *“What team did you play last week / game?”*
- *“Did your team win the last game?”*

Failure to answer any of these questions correctly may suggest a concussion. Recognise and remove any player who shows any signs or symptoms of concussion immediately and do not allow him/her to return to the training or playing field until he/she has been assessed by a medical practitioner.

## On field management of a suspected concussion

If a neck injury is suspected, the player should only be removed by emergency healthcare professionals with appropriate spinal care training.

Teammates, pitch side medical staff, coaches, match officials, team managers, administrators or parents who suspect a player may have concussion must do their best to ensure that the player is removed from the field of play in a safe manner.

## Side-line management of a suspected concussion

All players with a suspected concussion:

- Should be monitored by a responsible adult for the first 24 hours
- Should not drink alcohol until symptom free
- Should not drive until symptom free

If any of the following are reported or observed, then the player should be transported for urgent medical assessment at the nearest hospital:

- Severe neck pain
- Weakness or tingling/burning in arms or legs
- Deteriorating consciousness (more drowsy)
- Increasing confusion or irritability
- Severe or increasing headache
- Repeated vomiting
- Unusual behaviour change
- Seizure (fitting)
- Double vision

In all cases of suspected concussion it is recommended that the player be referred to a medical practitioner for diagnosis and guidance, as well as return to play decisions, even if the symptoms resolve.

## Managing a concussion or suspected concussion

### Rest the Body & Rest the Brain

The majority (80–90%) of concussions resolve in a short (7–10 day) period. This may be longer in children and adolescents and a more conservative approach should be taken with players of this age group.

Rest is the cornerstone of concussion treatment. This involves resting the body, 'physical rest', and resting the brain, 'cognitive rest'. This means the avoidance of:

- Physical activities e.g. running, cycling, swimming and lifting weights
- Cognitive activities e.g. driving, school-work, homework, reading, television, work at a computer, playing video games and social media

Complete physical and cognitive rest should be undertaken in the first 24 hours or until symptom free in all cases of concussion. In the case of children and adolescents, cognitive rest should be emphasised by parents / guardians.

Students must have returned to school or full studies before re-commencing exercise.

It is recommended that all players who have a confirmed concussion do not undertake strenuous exercise for a minimum of two weeks prior to undertaking a Graduated Return to Play (GRTP) programme. During this two weeks, players should undertake a period of relative rest, defined as a gradual return to normal activities of daily living.

After the minimum rest period and if symptom free, medical practitioner or physiotherapist approval is recommended prior to starting a Graduated Return to Play (GRTP) programme.\*

**\* Medical practitioners and physiotherapists should only work within their scope of practice. If practitioners have reservations regarding their experience or ability to allow someone to commence a GRTP they should refer the player appropriately.**

### Graduated Return to Play (GRTP) programme

If a player is still showing signs or symptoms of concussion he/she should not commence the GRTP programme and must return to his/her medical practitioner for further assessment.

A GRTP programme is a progressive exercise protocol that introduces a player back to sport in a step by step fashion.

The GRTP should be undertaken with the full co-operation of the player. In the case of children and adolescents, this should also include their parents/guardians.

Children and adolescents should be managed more conservatively

It is recommended that children and adolescents (players under the age of 19 years old as of the 1st of September) should undertake a more prolonged GRTP programme. With this in mind 24 hours rest should follow each stage of the GRTP for these players (i.e. each stage will last 48 hours).

During the GRTP programme, the player may only proceed to the next stage if there are no symptoms of concussion experienced during or after that level of exercise.

If any symptoms occur while undertaking the GRTP programme, the player must return to the previous stage, undertake a minimum 24-hour period of rest without symptoms and attempt to progress again.

If symptoms persist players should seek the advice of a medical practitioner before attempting further stages of the GRTP.

Where possible a medical practitioner, physiotherapist, coach or PE teacher should supervise stages 2–4 (this may be conducted during training or PE sessions). Continual assessment of symptoms should be undertaken at each stage of the programme.

On completing stage 4 it is recommended that players obtain clearance from a medical practitioner to progress to stage 5 (full contact practice).

- Schools and clubs are advised to keep a record of the player's or parent's confirmation that clearance has been obtained, a doctor's letter is not necessarily required (see [wru.co.uk /medical](http://wru.co.uk/medical) for full guidance)



## PHOTOGRAPHY AND THE USE OF IMAGES

The WRU believes it is important that parents or guardians are able to celebrate the achievements of their children through taking photographs or filming. In addition The WRU recognises that promoting images of the sport will help encourage increased participation, and does not advocate the banning of photography and the use of images and videos of children, but recommends that appropriate and proportionate safeguards should be in place to ensure a safe sporting environment for children and young people.

There may be reasons why individuals may not wish their child's photograph to be taken by someone they do not know personally.

There may be children who for legal or child protection reasons cannot be photographed. The reasons behind this decision may be confidential and are often sensitive matters, for example estranged parents looking to gain access to a child, or families that have fled abusive situations.

It is important that this confidentiality is respected. Parents or guardians must be offered the opportunity to withhold consent for photographs / filming of their child. It is therefore extremely important that Coaches and/or Team Managers are aware that the child cannot be photographed.

To ensure that this is managed effectively, the Team Manager or Coach should consider notifying the opposition Coach or Team Manager of this prior to the game taking place without disclosing the identity of the child. Therefore in some games there may be a photograph ban, but this will generally not be the case.

It is important that this is dealt with as confidentially as possible but clearly the information has to be shared to prevent any legal or child protection breach of policy.

There are risks to children associated with the use of photographs on sports websites and other publications, and this also needs to be monitored and managed effectively.

Photographs can be used as a means of identifying children when they are accompanied with personal information. This information can make a child vulnerable to an individual who may wish to 'groom' the child. Information placed on the internet has also been used by estranged parents (e.g. in adoption or domestic violence circumstances) to identify, trace and cause significant difficulties for children. The content of photographs can itself be inappropriate, or be used or adapted for inappropriate use. There is evidence of inappropriate or adapted material finding its way onto sites showing child abuse images, and of inappropriate images being shared between groups of offenders.

The WRU does not advocate the banning of photography but recognises the importance of putting in place appropriate and proportionate safeguards to ensure a safe sporting environment for children and young people and allow children (and their parents/guardians on their behalf) the right to decide whether their photograph is taken, and how the images may be used.

Clubs need to develop a policy in relation to the use of images of young athletes on their websites and in other publications. The organisation will need to make decisions about the type of images they consider suitable and that appropriately represent the club or sport, without putting children at increased risk. They will want to ensure that parents, young people and others understand and support their policy. When assessing the potential risks in the use of images of athletes, the most important factor is the potential for inappropriate use of images of children.

There is a need to ensure that parents or guardians have consented to photographs being taken of their child. It is good practice to obtain consent from the relevant parties when players are registered at the beginning of each season so that the Coaching and Management Team are fully aware if there are any issues that will need to be managed. A Photographic/ Video Consent Form should be completed (see appendices)

The following principles should be adopted as best practice by clubs:

- The interests and welfare of children taking part in sporting activities is paramount
- Children and their parents or guardians have a right to decide whether their images are taken, and how these may be used
- Children and their parents or guardians must provide written consent for their images to be taken and used
- Consent is only meaningful when the club or organisation ensures that children and their parents or guardians understand the nature of potential risks associated with the intended type, use and distribution of the images

There are a number of safeguarding measures that can be adopted as part of the club policy:

- Where possible do not include the name of a child whose image is being used
- If naming a child or group of children in an image, only use their first names, as this will reduce the risk of inappropriate, unsolicited attention from people within and outside the sport
- Avoid the inclusion of other detailed information about individual children
- Ask for the child's permission to use their image. This ensures that they are aware of the way the image is to be used to represent the sport
- Ask for parental permission to use an image of a young person. This ensures that parents are aware of where and how the image of their child will be used to represent the club, event or sport (e.g. in a sport magazine, on a website, or on Facebook)
- Ensure parents understand the nature of the potential risks associated with the intended use of the image(s)
- Be clear about how and for how long images will be securely stored (including how access to the images, associated consents and other information will be controlled)
- Only use images of children in suitable dress/kit (including required or recommended safety wear such as shin pads, gum shields and so on) to reduce the risk of inappropriate use
- Images should positively reflect the child's involvement in the activity (e.g. showing smiling participants rather than anxious or unhappy ones) and promote the best aspects of the sport
- Consider what is appropriate in terms of location i.e. photographs shouldn't be taken in changing rooms or in toilet areas
- Create and publicise a procedure for reporting the abuse of images or the use of inappropriate images, to reduce the risks to children

Photographs will sometimes be uploaded onto Club websites or other social media such as Twitter or Facebook. Please see the section on Social Media Policy in relation to the responsible management of photographs and videos.

## Photographs at Events

The WRU permits spectators and accredited professional photographers to take photographs at events, but requires those organising such events to regulate the taking of photographs and apply, as a minimum, the following safeguarding measures:

- Publish clear guidance as part of the Match or Event Programme and nominate an Events Manager, who has responsibility for managing all photographers
- Provide a briefing to photographers on what is considered acceptable in terms of the appropriate imagery and conduct and any areas where photography is forbidden (e.g. changing rooms, toilet areas)
- Consider a public announcement at the event that photographs can be taken but photographers (professional or spectators) must register with the Event Manager
- Issue the photographer with identification which must be worn at all times
- Inform children and parents that a photographer will be in attendance at an event and ensure they consent to both the taking and publication of films or photographs which feature and clearly identify their child (e.g. close ups, small group and team photos)
- At many events, organisers and others will reasonably wish to take wide angle, more general photos of the event sites. Parents and children should at least understand that these types of images will be taken during, or at specific points in, the event e.g. information could be included on the parental consent form or programme. It is not reasonable, practical or proportionate to require parental consents for taking these general types of images, or to preclude it on the basis of the concerns of a small number of parents
- Do not allow unsupervised access to children or one to one photo sessions at events
- Do not approve or allow photo sessions outside the event or at a child's home
- Children, parents and others should be informed that if they have concerns they can report these to the Event Manager or CSO
- Concerns regarding inappropriate or intrusive photography should be reported to the Event Manager, CSO or other club management officials and recorded in the same manner as any other child protection concern
- Clarify issues of ownership, retention and access (by event staff and participants/ parents) to the images

Professional photographers/filming/video operators wishing to cover an event will need to apply for accreditation by the event organiser at least fourteen working days before the event. The accreditation process will require proof of professional identification details, which should be verified with the issuing authority prior to the event.

Students or amateur photographers/film/video operators wishing to record the event should seek accreditation with the Event Manager by producing their student or club registration card and/ or a letter from the club/educational establishment outlining the reason for attending the event and planned use of the photographs or video footage.

The following is an example of what is required in terms of registration and monitoring in relation to the use of photography or video could be publicised in the Match or Event Programme:

*'In line with the Welsh Rugby Union Safeguarding Policy and our own Club Policy, the organisers of this event request that any person wishing to engage in any video or photography should register their details with the Event Manager before carrying out any such photography. The promoter reserves the right to decline entry to any person unable to meet or abide by the club policy and conditions for this event. If you are concerned about any photography taking place at this event, please contact the Event Manager or Club Safeguarding Officer who will discuss this matter with you'.*

## Filming for Coaching Purposes

There is no intention to prevent Team Managers, Club Coaches or Teachers from using videoing as a legitimate coaching aid, however this has to be managed with the welfare of children as the paramount consideration.

It's important that the appropriate consent has been obtained, and the children/young people and their parents should be aware that this is part of the coaching programme. They should be briefed on the reason that the game is being filmed and that it is for an analytical or coaching purpose.

There is a possibility that the filming may be conducted by clubs, districts or regions for the above reasons. The filming is not being conducted for publication so there is a Filming for a Coaching Purpose Consent Form that should be completed when a child joins the club, district or region. It's important that appropriate care is taken to securely store the footage to avoid inappropriate usage.

## Publication of Images

The following guidance should be applied when seeking to publish images:

- Prior to taking photographs or filming a child, the child (or their parent/guardian) should be informed of the purpose and where the images will be published e.g. in print or on a website
- The child (or their parent/guardian) should be asked to provide their written consent for their images to be taken and published
- Images of children should not be accompanied by identifying personal details. This includes first name and surname, address etc. This reduces the risk of inappropriate, unsolicited attention from people within and outside the sport. If it is important to name a child, their image should not be used
- Only images of children in appropriate sporting attire should be used to reduce the risk of the image being adapted for inappropriate use
- Sporting action shots should focus on the activity rather than a particular child and should avoid full face and body shots
- Website managers should carefully monitor content and ensure any inappropriate images or improper text is removed

The WRU should be informed of any inappropriate use of imagery on websites or any other form of media, which is not in keeping with this guidance. Anyone discovering a child's image that may be illegal should follow WRU reporting procedures and ensure the WRU Safeguarding Co-ordinator and Children's Social Care and/or Police are informed.

If a representative from the WRU has requested to take photographs or film footage of children for use in its publicity materials; parents, guardians, child model(s) (children under 18 years of age) or appropriate representatives should read this information carefully before signing the Photograph/ Filming Consent Form (see appendices)

If prior consent is in verbal form due to time constraints, it is essential that the form is completed later. The visual material will not be used or paid for unless the form has been completed and returned to The WRU.

The photographs / film may be used in publicity material such as the Annual Report, newsletters, magazines, brochures, video footage, the WRU website or intranet, and other promotional media materials.

The photographs / film may be used for a number of years, depending on its relevance to WRU activities. You should keep a copy of this consent form for your records.

## PHOTOGRAPH/VIDEO CONSENT FORM

<b>Name</b>	
<b>Club</b>	

### To be completed by the Child/ Young Person

I consent to being photographed or filmed regarding my involvement in rugby union under the conditions listed below	
I consent to the photographs or film being published*	
<b>Signature</b>	
<b>Date</b>	

### To be completed by the Parent/ Guardian of the person to be photographed

<b>Name</b>	
<b>Address</b>	

I hereby grant permission for my child to be photographed or filmed regarding their involvement in rugby union under the conditions listed below	
I consent to the photographs or film being published*	
<b>Comments</b>	
<b>Signature</b>	
<b>Date</b>	

\*Delete if not agreed

Conditions can be agreed as to where they can be published i.e. club websites, social media etc.



## FILMING FOR A COACHING PURPOSE CONSENT FORM

<b>Name</b>	
<b>Club</b>	

### To be completed by the Child/ Young Person

I consent to being photographed or filmed regarding my involvement in rugby union under the conditions listed below	
I consent on the basis that the filming is conducted for a coaching purpose and will not be published	
<b>Signature</b>	
<b>Date</b>	

### To be completed by the Parent/ Guardian of the person to be photographed

<b>Name</b>	
<b>Address</b>	

I hereby grant permission for my child to be photographed or filmed regarding their involvement in rugby union under the conditions listed below	
I consent to the photographs or film being published*	
<b>Signature</b>	
<b>Date</b>	

## SOCIAL MEDIA

This policy provides guidance on the procedures that will support and underpin the use of social networking and other online services within your club or organisation.

The Welsh Rugby Union are committed to promoting safe and responsible use of social media.

There are huge benefits in using social media in a sporting context, and sites such as Facebook are used regularly by rugby clubs and organisations to communicate with players and participants. There are many forms of social media that are used by children and young people involved in rugby whether within a rugby environment or not.

1. Young people who behave aggressively online are more than twice as likely to be victimised online, so children's own behaviour when using social media is key to their well-being there.
2. The most common risk young people face online is peer harassment or aggression – in other words hurtful, harassing, or defamatory behaviour.
3. A child's psychosocial makeup and physical environment (for example, home and school) are better predictors of risk than any technology the child uses.
4. Not all children are equally at risk online, and the children who are most at risk online are those who are most at risk in 'real life' or offline.
5. Although, for the vast majority of children, online social networking is largely a reflection of offline life, it can also amplify, perpetuate and widely distribute real-life problems or conflicts – very quickly. Something posted in anger or on impulse is extremely difficult to take back, so it has never been more important for users (of any age) to think before they speak, post, or send a text message.

It is important that all staff, volunteers, coaches, officials, referees, or senior management committee members, or anyone working on behalf of the organisation are aware of the club policy and agree to the following terms:

- To protect all children and young people attending the rugby club/organisation and who make use of technology (such as mobiles phones, games consoles/hand held devices and the internet) whilst they're within the care of the club/organisation.
- To provide staff and volunteers with policy and procedure information regarding online safety.
- To ensure the club/organisation is operating in line with their values and within the law regarding how the organisation uses information technology.



The following issues should be considered, and may be part of the club policy in terms of social media:

- Understand the safety aspects including what is acceptable and unacceptable behaviour when using digital technology such as social networking sites (e.g. Twitter and Facebook), mobile phones, game consoles and the internet
- When engaging with digital technology/social networking companies it is important to ensure that they adhere to relevant legislation and good practice guidelines
- Review existing safeguarding policies and procedures to ensure that online safeguarding issues are fully integrated, reporting online concerns about possible abuse or other breaches of terms
- Decide how your club website will be managed within your club/organisation
- Ensure the person managing the organisation's website understands his/her responsibilities in terms of safeguarding
- Ensure the involvement of the Club Safeguarding Officer in monitoring the website
- Ensure any interactive content is moderated e.g. club social network page/discussion forums
- Ensure that adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers i.e. Facebook closed groups
- Ensure that staff and volunteers, including coaches and athletes, are aware of the need to protect their privacy online. Staff and volunteers should be encouraged by the club/organisation to carefully consider who they give access to their personal information online. All staff and volunteers should ensure that there is a clear differentiation between their personal and professional profiles
- Promote safe and responsible use
- Avoid taking or publishing personal details of children and young people
- When uploading content – 'think before you post'

## **Social Media Codes of Conduct**

There is now a Social Media and Communications Code of Conduct which outlines the expectations and standards that are required.

These are included in the WRU Disciplinary Regulations that are available on the WRU website.

Breaches of the Codes of Conduct may be investigated as misconduct or safeguarding matters. Complaints of threatening behaviour, bullying or harassment conducted online may lead to the matter being investigated by the WRU or by the Police.

## Text Messaging and E-mail

Rugby clubs and other sports organisations are keen to utilise text messaging and e-mail systems to help improve communication and increase participation. Children, young people and adults at risk are able to contact Team Managers and Coaches regarding arrangements for training and playing.

The significant benefit of these forms of communication is that it is not only cheap, but it is one of the most direct forms of communication as most people have mobile phones, or access to the internet.

It is therefore hoped that the responsible use of text messages/ e-mails will help to:

- Improve communication
- Increase publicity about events, training and games
- Attract more people into the game
- Improve retention rates

For children, young people, and adults at risk, the safeguarding risks associated with texting/e-mail include:

- Inappropriate access to, use or sharing of personal details (e.g. names, mobile phone numbers)
- Unwanted contact from others
- Text bullying by peers
- Online bullying by peers (see cyberbullying below)
- Being sent offensive or otherwise inappropriate materials
- Grooming for sexual abuse
- Posting inappropriate photographs as this can lead to exploitation
- Direct contact and actual abuse

For adults involved risks include:

- Misinterpretation of their communication with young people
- Potential investigation (internal or by statutory agencies)
- Potential disciplinary action

If the communication is between adults and children, the people who should be in contact with children about playing and training arrangements etc., should be the Team Manager or Coach. Both of these roles require an enhanced DBS check as part of the volunteer recruitment vetting process.

All text messages and e-mails must be sent via a group message i.e. the same standard message being sent to every member of the group. The text messaging or e-mail system should never be used to send messages on an individual basis (i.e. to just one person).

Text messages and e-mails which are sent must never contain any offensive, abusive or inappropriate language.

It is good practice to send the message/ e-mail to a moderator, which may be the Club Safeguarding Officer, another member of the Coaching and Management Team or a Parent Helper. Hence, it is essential that the moderator's mobile phone number is included in every 'communication group' that is set up, and in every group message that is sent out. The moderator's role will be to ensure that the system is being used appropriately, and to respond to any concerns arising.

The content should relate solely to sports activity. Messages should reflect the professional relationship between coach and athlete, and the coach's position of trust. Text messages, e-mails and mobile phones must never be used for any other reason or in any other way.

Consideration will be given to initiating the organisation's child protection and disciplinary procedures should any breaches of this protocol arise, including consultation with or referral to statutory agencies if indications of illegal activity (e.g. grooming for abuse) come to light.

Consent must be obtained prior to sending the young people text messages or e-mails. For young people aged 15 or under, specific consent must be obtained from their parents.

Parents of children must be offered the option to be copied into any texts or e-mails that their child is sent. Although parental consent is not required for young people aged 16 and over, written consent must be obtained from these individuals themselves. Please note that for the over 16's (who are children as defined by the Children Act 1989) it is still recommended that their parents are also informed of the intention to send their children text messages or e-mails, the reason for this, and that the organisation has taken steps to ensure their child's safety in this respect.

## Online Practical Guidance

- Adults in a position of trust i.e. Coach, Team Manager etc. who have their own personal Facebook account, should not add children as friends
- If you do have children as friends on your Facebook account then you may be putting yourself at risk
- You should set your privacy settings so that people cannot see your personal account
- If your age group, club or organisation are using Facebook as a means of communication ensure that there is a closed group, which is managed by a moderator who has been appropriately vetted
- The moderator or CSO should monitor the website and any postings for inappropriate comments or misuse
- Social media should only be used as a communication tool for rugby purposes, if there are specific messages that need to be given then this can be done via the parents
- Inappropriate posts or comments should be reported to the CSO
- Act responsibly online and think before you post, avoid using social media when you're tired, emotional or have been drinking alcohol
- Ensure that the personal details of children are not included on social media or club websites, particularly if there is an accompanying photograph, as this may make them vulnerable and it should be avoided
- Block users who harass, cause offence or bully others
- Don't link to other sites that may post offensive or inappropriate comments

## SAFEGUARDING CONTACTS

There are a list of safeguarding contact numbers included below

Contact Details:

### **Welsh Rugby Union Integrity Hotline**

029 20 822 200

Integrity@wru.wales

### **Welsh Rugby Union Safeguarding Team**

WRU Centre of Excellence

Vale of Glamorgan Resort

Hensol

CF72 8JY

02920 822330

02920 822442

### **NSPCC National Centre**

42 Curtain Road

London Helpline: 0808 800 5000

EC2A 3NH

0808 800 5000

### **Childline UK**

Freepost 1111

London

N1 OBR

0800 1111

[www.childline.org.uk](http://www.childline.org.uk)

### **NSPCC Cymru/Wales**

Child Protection Helpline

0808 100 2524

### **NSPCC – WALES - Child Protection in Sport Unit**

Sport Wales National Centre

Sophia Close

Cardiff

CF11 9SW

02920 334975

### **NSPCC – NATIONAL - Child Protection in Sport Unit**

3 Gilmour Close

Beaumont Leys

Leicester

L4 1EZ

0116 234 7278

### **NSPCC 24 hour Helpline**

0808 800 5000

### **Ann Craft Trust**

Sport Wales National Centre

Sophia Close, Cardiff, CF11 9SW 02920 334975 or

0115 951 5400





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