

**Commonwealth Games Wales**

**Safeguarding Adults Policy**

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Safeguarding Adults Policy**

*Policy Owner: Commonwealth Games Wales*

*Policy approved by: The Board*

*Date Policy approved: 20TH June 2023*

*Next review Date: 20th June 2025*

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**Contents**

[Section 1: Safeguarding Adults Policy 4](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466344)

[Introduction 5](#_Toc135466345)

[Policy Statement 6](#_Toc135466346)

[Purpose 7](#_Toc135466347)

[Scope 7](#_Toc135466348)

[Commitments 7](#_Toc135466349)

[Implementation 9](#_Toc135466350)

[Section 2: Supporting Information 10](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466351)

[Key Points 11](#_Toc135466352)

[Safeguarding Adults Legislation 12](#_Toc135466353)

[Definition of an Adult at Risk 12](#_Toc135466354)

[Abuse and Neglect 12](#_Toc135466355)

[Signs and Indicators of Abuse and Neglect 14](#_Toc135466356)

[Wellbeing Principle 14](#_Toc135466357)

[Person Centred Safeguarding/ Making Safeguarding Personal 17](#_Toc135466358)

[Mental Capacity and Decision Making 18](#_Toc135466359)

[Recording and Information Sharing 20](#_Toc135466360)

[Multi-Agency Working 21](#_Toc135466361)

[Section 3: Appendices 23](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466362)

[Appendix 1 - Role Description: Commonwealth Games Wales Safeguarding Lead 24](#_Toc135466363)

[Appendix 2 – Sources of Information and Support 26](#_Toc135466364)

[Appendix 3 – Safeguarding Adults Procedures 28](#_Toc135466365)

[Introduction 29](#_Toc135466366)

[Glossary 30](#_Toc135466367)

[Section 1: Reporting Concerns (For everyone) 31](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466368)

[Reporting Concerns About Yourself 32](#_Toc135466369)

[Reporting Concerns About Others 33](#_Toc135466370)

[Reporting Concerns About Others 33](#_Toc135466371)

[Responding to a Direct Disclosure 35](#_Toc135466372)

[Record Keeping 36](#_Toc135466373)

[Section 2: What happens next? (Safeguarding Lead and Commonwealth Games Wales response) 37](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466374)

[Procedure for Safeguarding Lead 38](#_Toc135466375)

[Immediate Response 38](#_Toc135466376)

[Taking Action 39](#_Toc135466377)

[Section 3: Appendices 42](file:///C:\Users\tomh\Documents\sos%20connect\Live\checkedout\3578294\3578294%20Commonwealth%20Games%20Wales%20-%20Safeguarding%20Adults%20Policy.docx#_Toc135466378)

[Appendices 43](#_Toc135466379)

[Appendix 4 - Safeguarding Adults Report Form 43](#_Toc135466380)

[Appendix 5 – Anti-Harassment and Bullying Policy 48](#_Toc135466381)

# Section 1: Safeguarding Adults Policy

## Introduction

Commonwealth Games Wales is committed to Safeguarding Adults in line with national legislation and relevant national and local guidelines.   
  
Commonwealth Games Wales will safeguard adults by ensuring that our activities are delivered in a way which keeps all adults safe.   
  
Commonwealth Games Wales is committed to creating a culture of zero-tolerance of harm to adults which necessitates: the recognition of adults who may be at risk and the circumstances which may increase risk; knowing how adult abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns.   
  
This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person’s own home and in any care setting.   
  
Commonwealth Games Wales is committed to best safeguarding practice and to uphold the rights of all adults to live a life free from harm from abuse, exploitation and neglect.

## **Policy Statement**

Commonwealth Games Wales believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.   
  
Commonwealth Games Wales is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.  
  
Commonwealth Games Wales acknowledges that safeguarding is everybody’s responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults involved.   
  
Commonwealth Games Wales recognises that health, well-being, ability, disability and need for care and support can affect a person’s resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. Commonwealth Games Wales recognise that these factors can vary at different points in people’s lives.   
  
Commonwealth Games Wales recognises that there is a legal framework within which sports need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.  
  
Actions taken by Commonwealth Games Wales will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

Purpose

The purpose of this policy is to demonstrate the commitment of Commonwealth Games Wales to safeguarding adults and to ensure that everyone involved in Commonwealth Games Wales is aware of:

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

## Scope

This safeguarding adult policy and associated procedures apply to all individuals involved in Commonwealth Games Wales including Board members, Staff, Coaches, Volunteers and Team Members and to all concerns about the safety of adults whilst taking part in Commonwealth Games Wales, its activities and in the wider community.

Commonwealth Games Wales expect our partner organisations, including for example, National Governing Bodies and sponsors to adopt and demonstrate their commitment to the principles and practice as set out in this Safeguarding Adults Policy and associated procedures.

## Commitments

In order to implement this policy Commonwealth Games Wales will ensure that:

* Everyone involved with Commonwealth Games Wales is aware of the safeguarding adult procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an adult.
* Any concern that an adult is not safe is taken seriously, responded to promptly, and   
  followed up in line with Commonwealth Games Wales Safeguarding Adults Policy and Procedures.
* The well-being of those at risk of harm will be put first and the adult actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to (see the Safeguarding Adults Procedures below).
* Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
* Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Privacy Notice.
* Commonwealth Games Wales acts in accordance with best practice advice, for example, from UK Sport, Sport Wales, National Governing Bodies, NSPCC and Ann Craft Trust.
* Commonwealth Games Wales will cooperate with the Police and the relevant Local Authorities in taking action to safeguard an adult.
* All Board members, staff, officials and volunteers understand their role and responsibility for safeguarding adults and have completed and are up to date with safeguarding adult training and learning opportunities appropriate for their role.
* Commonwealth Games Wales uses safe recruitment practices and continually assesses the suitability of volunteers and staff to prevent the employment/deployment of unsuitable individuals in Commonwealth Games Wales and within the sporting community.
* Commonwealth Games Wales shares information about anyone found to be a risk to adults with the appropriate bodies. For example: Disclosure and Barring Service, Services, Police, Local Authority/Social Services.
* When planning activities and events Commonwealth Games Wales includes an assessment of, and risk to, the safety of all adults from abuse and neglect and designates a person who will be in attendance as a safeguarding lead for that event.
* Actions taken under this policy are reviewed by the Board and senior management team on an annual basis.
* This policy, related policies (see below) and the Safeguarding Adults Procedures are reviewed no less than on a two yearly basis and whenever there are changes in relevant legislation and/or government guidance as required by the Local Safeguarding Board, UK Sport, Sport Wales and National Governing Bodies or as a result of any other significant change or event.

## Implementation

Commonwealth Games Wales is committed to developing and maintaining its capability to implement this policy and procedures.   
In order to do so the following will be in place:

* A clear line of accountability within Commonwealth Games Wales for the safety and welfare of all adults.
* Access to relevant legal and professional advice.
* Regular management reports to the Board detailing how risks to adult safeguarding are being addressed and how any reports have been addressed.
* Safeguarding adult procedures that deal effectively with any concerns of abuse or neglect, including those caused through poor practice.
* A Safeguarding Lead (see Appendix 1).
* A delegated Safeguarding Lead for events and competitions.
* Arrangements to work effectively with other relevant organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
* Codes of conduct for Board members, Staff, Coaches, Officials, Volunteers and Team Members and other relevant individuals that specify zero tolerance of abuse in any form.
* Risk assessments that specifically include safeguarding of adults.
* Policies and procedures that address the following areas and which are consistent with this Safeguarding Adults policy.  
  + Safeguarding Children
  + Bullying and harassment (see Appendix 5 below)
  + Social Media
  + Equality, diversity and inclusion
  + Safe activities risk assessments
  + Code of Conducts and a process for breach of these - Staff, Coaches, Officials, Volunteers, Participants/Members, Carers/Personal Assistants, Fans
  + Discipline and grievance
  + Concerns, Complaints and Compliments
  + Whistleblowing
  + Safe recruitment and selection (staff and volunteers)
  + Contract compliance
  + Information policy, data protection and information sharing

# Section 2: Supporting Information

Key Points

* There is a **legal duty on Local Authorities** to provide support to ‘adults at risk’.
* **Adults at risk** are defined in legislation.
* The safeguarding legislation applies **to all forms of abuse** that harm a person’s well-being.
* The law provides a framework for good practice in safeguarding that makes the overall **well-being** of the adult at risk a priority of any intervention.
* The law emphasises the importance of **person-centred safeguarding**.
* The law provides a framework for making decisions on behalf of adults who can’t make decisions for themselves (**Mental Capacity**).
* The law provides a framework for sports organisations to **share concerns** they have about adults at risk with the local authority.
* The law provides a framework for all organisations to **share information and cooperate** to protect adults at risk.

## **Safeguarding Adults Legislation**

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

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

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

* Care and Support Statutory Guidance (especially chapter 14) 2014
* Wales - Social Services and Well Being Act 2014
* Wales Safeguarding Procedures 2019

Many other pieces of UK and Welsh legislation also affect adult safeguarding.   
These include legislation about different forms of abuse and those that govern information sharing. For example, legislation dealing with:

* Murder/attempted murder
* Physical Assault
* Sexual Offences
* Domestic Abuse/Coercive control
* Forced Marriage
* Female Genital Mutilation
* Theft and Fraud
* Modern slavery and Human exploitation
* Hate crime
* Harassment
* Listing and Barring of those unsuitable to work with adults with care and support needs

Wales also has legislation about the circumstances in which decisions can be made on behalf of an adult who is unable to make decisions for themselves:

* England and Wales - Mental Capacity Act 2005
* There are specific offences applying to the mistreatment of and sexual offences against adults who do not have Mental Capacity and specific offences where mistreatment is carried out by a person who is employed as a carer: e.g. wilful neglect and wilful mistreatment.

## **Definition of an Adult at Risk**

The Safeguarding Adults legislation creates specific responsibilities on Local Authorities, Health, and the Police to provide additional protection from abuse and neglect to Adults at Risk.   
  
When a Local Authority has reason to believe there is an adult at risk, they have a responsibility to find out more about the situation and decide what actions need to be taken to support the adult. In Wales, the Local Authority can gain access to an adult to find out if they are at risk of harm for example, if that access is being blocked by another person.   
  
The actions that need to be taken might be by the Local Authority (usually social services) and/or by other agencies, for example the Police. Commonwealth Games Wales may need to take action as part of safeguarding an adult, for example, to use the disciplinary procedures in relation to a member of staff or member who has been reported to be harming a participant. The Local Authority role includes having multi-agency procedures which coordinate the actions taken by different organisations.   
  
**An Adult at risk is defined in the Social Services and Well-being (Wales) Act 2014 as follows;**

An adult at risk is an individual aged 18 years and over who:

a) is experiencing or is at risk of abuse or neglect, AND;

b) has needs for care and support (whether or not the authority is meeting any of those needs) AND;

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

## Abuse and Neglect

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

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

Safeguarding legislation in Wales lists categories of abuse as follows:

* Physical
* Sexual
* Psychological
* Neglect
* Financial

Abuse can take place in any relationship and there are many contexts in which abuse might take place; e.g. Institutional abuse, Domestic Abuse, Forced Marriage, Human Trafficking, Modern Slavery, Sexual Exploitation, County Lines, Radicalisation, Hate Crime, Mate Crime, Cyber bullying, Scams.   
  
Abuse can take place within a sporting context and the person causing harm might be any other person. For example: a member of staff, a coach, a volunteer, a participant or a fan.   
  
Some examples of abuse within sport include:

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

Abuse or neglect outside sport could be carried out by:

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

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

## Signs and Indicators of Abuse and Neglect

An adult may confide to a member of staff, coach, volunteer or another participant that they are experiencing abuse inside or outside of Commonwealth Games Wales setting. Similarly, others may suspect that this is the case.   
  
There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

* Unexplained bruises or injuries – or lack of medical attention when an injury is present.
* Person has belongings or money going missing.
* Person is not attending / no longer enjoying their sessions. You may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.
* Someone losing or gaining weight / an unkempt appearance. This could be a player whose appearance becomes unkempt, does not wear suitable sports kit and there is a deterioration in hygiene.
* A change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions in contrast to their personal assistant whom they greet with a smile.
* Self-harm.
* A fear of a particular group of people or individual.
* A parent/carer always speaks for the person and doesn’t allow them to make their own choices
* They may tell you / another person they are being abused – i.e. a disclosure.

## 

## Wellbeing Principle

The concept of ‘well-being’ is threaded throughout UK legislation and is part of the Law about how health and social care is provided. Our well-being includes our mental and physical health, our relationships, our connection with our communities and our contribution to society.  
  
Being able to live free from abuse and neglect is a key element of well-being.

The legislation recognises that statutory agencies have sometimes acted disproportionately in the past. For example, removing an adult at risk from their own home when there were other ways of preventing harm.   
  
For that reason any actions taken to safeguard an adult must take their whole well-being into account and be proportionate to the risk of harm.

## Person Centred Safeguarding/ Making Safeguarding Personal

The legislation also recognises that adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from friends and family to take a better job. Similarly, adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.   
  
None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety we need to understand ‘What matters’ to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.  
  
The concept of ‘Person Centred Safeguarding’/’Making Safeguarding Personal’ means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Organisations work to support adults to achieve the outcomes they want for themselves. The adult’s views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

#### The Principles of Adult Safeguarding in Wales are defined in the Social Services and Well-being (Wales) Act 2014 as follows;

**The Act’s principles are:**

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

## Mental Capacity and Decision Making

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

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

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

A person’s ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.   
  
Most adults have the ability to make their own decisions given the right support however, some adults with care and support needs have the experience of other people making decisions about them and for them.

Some people can only make simple decisions like which colour T-shirt to wear or can only make decisions if a lot of time is spent supporting them to understand the options. If someone has a disability that means they need support to understand or make a decision this must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called “lacking mental capacity”.   
  
Mental capacity refers to the ability to make a decision at the time that decision is needed. A person’s mental capacity can change. If it is safe/possible to wait until they are able to be involved in decision making or to make the decision themselves.  
  
For example:

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

Mental Capacity is important for safeguarding for several reasons.  
  
Not being allowed to make decisions one is capable of making is abuse. For example, a disabled adult may want to take part in an activity but their parent who is their carer won’t allow them to and will not provide the support they would need. Conversely the adult may not seem to be benefiting from an activity other people are insisting they do.  
  
Another situation is where an adult is being abused and they are scared of the consequences of going against the views of the person abusing them. It is recognised in the law as coercion and a person can be seen not to have mental capacity because they cannot make ‘free and informed decisions’.  
  
Mental Capacity must also be considered when we believe abuse or neglect might be taking place. It is important to make sure an ‘adult at risk’ has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened, however, in some situations the adult may not have the mental capacity to understand the choice or to tell you their views.   
  
Wales has legislation that describes when and how we can make decisions for people who are unable to make decisions for themselves. The principles are the same.

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

Many potential difficulties with making decisions can be overcome with preparation. A person needing support to help them make decisions whilst taking part in a sports organisation will ordinarily be accompanied by someone e.g. a family member or formal carer whose role includes supporting them to make decisions.   
  
It is good practice to get as much information about the person as possible. Some people with care and support needs will have a ‘One page profile’ or a ‘This is me’ document that describes important things about them. Some of those things will be about how to support the person, their routines, food and drink choices etc. but will also include things they like and don’t like doing. It’s also important to have an agreement with the person who has enrolled the adult in the sports activity about how different types of decisions will be made on a day to day basis.   
  
If a person who has a lot of difficulty making their own decisions is thought to be being abused or neglected you will need to refer the situation to the Local Authority, and this should result in health or social care professionals making an assessment of mental capacity and/or getting the person the support they need to make decisions.

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

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

## Recording and Information Sharing

Commonwealth Games Wales must comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).   
  
Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.   
  
Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.   
  
Sharing information, with the right people, is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a ‘need to know’.  
This does **NOT** automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within Commonwealth Games Wales. For example, anyone who has a concern about harm can make a report to an appropriate person within the same organisation.

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside Commonwealth Games Wales. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.  
  
The circumstances when we need to share information without the adult’s consent include those where:

* it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
* you believe they or someone else is at risk, including children.
* you believe the adult is being coerced or is under duress.
* it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
* the adult does not have mental capacity to consent to information being shared about them.
* the person causing harm has care and support needs.
* the concerns are about an adult at risk living in Wales (where there is a duty to report to the Local Authority).

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.  
  
If you are in doubt as to whether to share information seek advice e.g. seek legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm.  
  
Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

## Multi-Agency Working

Safeguarding adults’ legislation gives the lead role for adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations.  
  
Sports bodies may need to cooperate with the Local Authority and the Police including to:

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

# Section 3: Appendices

## Appendix 1 - Role Description: Commonwealth Games Wales Safeguarding Lead

The designated person within Commonwealth Games Wales has primary responsibility for putting into place procedures to safeguard adults at risk, supporting club, county and regional welfare/safeguarding leads, where relevant and for managing concerns about adults at risk.

Duties and responsibilities include:

* Working with others within Commonwealth Games Wales to create a positive inclusive environment within the sport.
* Play a lead role in developing and establishing Commonwealth Games Wales approach to safeguarding adults and in maintaining and reviewing the Commonwealth Games Wales implementation plan for safeguarding adults in line with current legislation and best practice.
* Coordinate the dissemination of the safeguarding adult policy, procedures and resources throughout Commonwealth Games Wales.
* Contribute to ensuring other policies and procedures are consistent with Commonwealth Games Wales commitment to safeguarding adults.
* Advise on Commonwealth Games Wales training needs and the development of its training strategy.
* Receive reports of and manage cases of poor practice and abuse reported to Commonwealth Games Wales – including an appropriate recording system.
* Support the chair to co-ordinate the case management process.
* Manage liaison with, and referrals to, external agencies for example adult social-care services and the police.
* Create a central point of contact for internal and external individuals and agencies concerned about the safety of adults within Commonwealth Games Wales.
* Provide advice and support to regional/county safeguarding/ welfare officers and play a lead role in their recruitment, selection and training.
* Represent Commonwealth Games Wales at external meetings related to safeguarding.

## Appendix 2 – Sources of Information and Support

**Action on Elder Abuse**

A national organisation based in London. It aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.

[Tel: 020 8765 7000](Tel:020%208765%207000)Email: [enquiries@elderabuse.org.uk](mailto:enquiries@elderabuse.org.uk)[www.elderabuse.org.uk](http://www.elderabuse.org.uk/)

**Ann Craft Trust** **(ACT)**

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector

Tel: 0115 951 5400

Email: [Ann-Craft-Trust@nottingham.ac.uk](mailto:Ann-Craft-Trust@nottingham.ac.uk)

[www.anncrafttrust.org](http://www.anncrafttrust.org/)

**Men’s Advice Line**

For male domestic abuse survivors

Tel: 0808 801 0327

**National LGBT+ Domestic Abuse Helpline**Tel: 0800 999 5428

**National 24Hour Freephone Domestic Abuse Helpline**

Llinell Gymorth Byw HebOfn/ Live free from fear helpline

Tel: 0808 8010 800

Type Talk: 18001 0808 801 0800

Text: 078600 77 333

**Rape Crisis Federation of England and Wales**

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

Email: [info@rapecrisis.co.uk](mailto:info@rapecrisis.co.uk)[www.rapecrisis.co.uk](http://www.rapecrisis.co.uk/)

**Respond**

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.

[Tel: 020 7383 0700](tel:%20020%207383%200700) or

[0808 808 0700](tel:%200808%20808%200700) (Helpline)   
Email: [services@respond.org.uk](mailto:services@respond.org.uk)[www.respond.org.uk](http://www.respond.org.uk/)

**Stop Hate Crime**

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual’s identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

24 hours service:

Telephone: 0800 138 1625

Web Chat: [www.stophateuk.org/talk-to-us/](http://www.stophateuk.org/talk-to-us/)

E mail: [talk@stophateuk.org](mailto:talk@stophateuk.org)

Text: 07717 989 025  
Text relay: 18001 0800 138 1625  
By post: PO Box 851, Leeds LS1 9QS

**Susy Lamplugh Trust**

The Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

[Tel: 020 83921839](tel:%20020%2083921839)[Fax: 020 8392 1830](http://fax:%20020%208392%201830/)Email: [info@suzylamplugh.org](mailto:info@suzylamplugh.org)[www.suzylamplugh.org](http://www.suzylamplugh.org/)

**Victim Support**

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

Tel: 0808 168 9111

[www.victimsupport.com](http://www.victimsupport.com/)

**Women’s Aid Federation of England and Wales**

Women’s Aid is a national domestic violence charity. It also runs a domestic violence online help service.

[www.womensaid.org.uk/information-support](http://www.womensaid.org.uk/information-support/)

## Appendix 3 – Safeguarding Adults Procedures

## Introduction

Commonwealth Games Wales is committed to providing a safe environment for everyone to participate in our organisation and its activities. These procedures must be followed in any circumstances where an adult is at risk of harm.   
  
The procedure should be implemented with reference to Commonwealth Games Wales Safeguarding Adults Policy and supporting information.

This procedure details the steps to be taken in responding to any concern that an adult involved in Commonwealth Games Wales, or its activities, is at risk of or is experiencing harm.

The procedures have two main sections:  
  
Section 1: Reporting concerns- **For everyone**   
  
Section 2: What happens next – **For** **Safeguarding Lead and Commonwealth Games Wales response**

## Glossary

For more details please see the additional information sections of Commonwealth Games Wales Safeguarding Adults Policy.

|  |  |
| --- | --- |
| **Adult** | **A person over the age of 18** |
| **Adult at risk** | An adult at risk is an individual aged 18 years and over who:  a) is experiencing or is at risk of abuse or neglect, AND;  b) has needs for care and support (whether or not the authority is meeting any of those needs) AND;  c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. |
| **Abuse** | A violation of a person’s physical, emotional or mental integrity by any other person. |
| **Harm** | Damage done to a person’s well-being. |
| **MASH** | Multi-Agency Safeguarding Hubs are used as a one point of contact/safeguarding referrals in some areas. Where they exist a referral to MASH benefits from the information held by and the expertise of various agencies e.g. Local Authority, Police and Health. |
| **Mental Capacity** | The ability to consider relevant information, make and communicate a decision. |
| **Safeguarding** | Work to prevent and to stop abuse and neglect. |
| **Safeguarding Adults Board (SAB)** (England and Wales) | A statutory body set up in line with national legislation. Statutory membership includes the Local Authority, Police and NHS. Representatives from the voluntary sector and of ‘citizens’ e.g. a representative from a disabled people’s forum are often also included. Their role is to coordinate safeguarding work across the Local Authority district. |

## Section 1: Reporting Concerns (For everyone)

### Reporting Concerns About Yourself

If you are in immediate danger or need immediate medical assistance contact the emergency services 999.   
  
Please contact the Safeguarding Lead, Anna Stembridge. If you would prefer, please contact another member of staff who will help you raise the issue to the Safeguarding Lead.   
  
If the Safeguarding Lead is implicated or you think has a conflict of interest, then report to the Commonwealth Games Wales Chief Executive.  
  
Commonwealth Games Wales will follow the procedure in this document. If you do not think your concerns are being addressed in the way that they should be please contact the Chief Executive or a member of the Board.   
  
At all stages you are welcome to have someone who you trust support you and help you to explain what happened and what you want to happen.  
  
**It is of upmost importance to Commonwealth Games Wales that you can take part in our activities safely and we will take every step to support you to do that**.

**If you are experiencing harm within Commonwealth Games Wales contact Anna Stembridge.**

### Reporting Concerns About Others

### Reporting Concerns About Others

**Speak to the Safeguarding Lead** Anna Stembridge and report your concerns without delay.  
*If you have concerns that they are implicated or may not act appropriately contact Commonwealth Games Wales Chief Executive.*

**Is a serious crime in progress or been committed?**

**Contact the police**   
**999**

**Yes**

**No**

**Seek medical attention** or contact emergency services **999**

**Yes**

**You have a concern, or have been told about, possible abuse of someone else, poor practice or wider welfare issues.**

**Is the person in immediate danger or** need immediate medical attention?

**No**

**Is it safe to speak with the adult?**

What does the adult want to happen?  
If you know their views include those throughout the process.

**Make notes and complete a Safeguarding Adults Concerns Report Form** (see Appendix 4 below), submit to the Commonwealth Games Wales Safeguarding Lead/Chief Executive.

You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

**You should not keep safeguarding concerns to yourself. If you have concerns and/ or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact the Commonwealth Games Wales Safeguarding Lead as soon as you can.**

If the Safeguarding Lead is implicated or you think has a conflict of interest, then report to the Commonwealth Games Wales Chief Executive.

**If you are concerned** about harm being caused to **someone else,** please follow the guidance below.

* It is not your responsibility to prove or decide whether an adult has been harmed or abused. It is however, everyone's responsibility to respond to and report concerns they have.
* If someone has a need for **immediate medical attention** call an ambulance on 999.
* If you are concerned someone is in **immediate danger** or a **serious crime** is being committed contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
* Remember to be **person centred**/**make safeguarding personal**. If it will not put them or you at further risk, discuss your safeguarding concerns with the adult and ask them what they would like to happen next. Inform them that you have to pass on your concerns to the Safeguarding Lead. **Do not** contact the adult before talking to the Safeguarding Lead if the person allegedly causing the harm is likely to find out.
* **Remember not to confront the person thought to be causing the harm**.

### Responding to a Direct Disclosure

If an adult indicates that they are being harmed or abused, or information is received which gives rise to concern, the person receiving the information should:

* Take it seriously.
* Stay calm.
* Listen carefully to what is said, allowing the adult to continue at their own pace,
* Be sensitive.
* Keep questions to a minimum, only ask questions if you need to identify/ clarify what the person is telling you.
* Reassure the person that they have done the right thing in revealing the information.
* Ask them what they would like to happen next.
* Explain what you would like to do next.
* Explain that you will have to share the information with the Commonwealth Games Wales Safeguarding Lead.
* Ask for their consent for the information to be shared outside Commonwealth Games Wales.
* Make an arrangement as to how you/the Safeguarding Lead can contact them safely.
* Help them to contact other organisations for advice and support (e.g. Police, Domestic Abuse helpline, Victim Support.
* Act swiftly to report and carry out any relevant actions.
* Record in writing what was said using the adult’s own words as soon as possible.

It is important **not** to:

* Dismiss or ignore the concern.
* Panic or allow shock or distaste to show.
* Make negative comments about the alleged perpetrator.
* Make assumptions or speculate.
* Come to your own conclusions.
* Probe for more information than is offered.
* Promise to keep the information secret.
* Make promises that cannot be kept.
* Conduct an investigation of the case.
* Confront the person thought to be causing harm.
* Take sole responsibility.
* Tell everyone.

### Record Keeping

* Complete a Safeguarding Adults Report Form (see Appendix 4 below) and submit to the Commonwealth Games Wales Safeguarding Lead without delay.
* Describe the circumstances in which the concern came about and what action you took/ advice you gave.
* It is important to distinguish between things that are facts, things that have been observed or over-heard and opinions, in order to ensure that information is as accurate as possible.
* If someone has told you about the harm or abuse, use the words the person themselves used. If someone has written to you (including by email, message) include a copy with the form.

**Be mindful of the need to be confidential at all times.**

**This information must only be shared with the Safeguarding Lead and others that have a need to know –e.g. to keep the person safe whilst waiting for action to be taken.**

## Section 2: What happens next? (Safeguarding Lead and Commonwealth Games Wales response)

### Procedure for Safeguarding Lead

Once a concern has been passed to the Commonwealth Games Wales Safeguarding Lead, they will coordinate the Commonwealth Games Wales Safeguarding Adults Procedure (see below).   
  
The Safeguarding Lead will keep clear records of decision making, actions taken, and the outcomes achieved. They will also collect feedback from the adult.   
  
The Safeguarding Lead, where appropriate, will take the following actions:

### Immediate Response

1. Ensure any **immediate actions** necessary to safeguard anyone at risk have been taken.   
     
   If the risk is said to be due to the behaviour of an employee or other person involved within Commonwealth Games Wales they will use the relevant procedures (e.g. breach of code of conduct, breach of contract, disciplinary or grievance procedures) to prevent that person making contact with the adult being harmed.
2. If they have been sent a **Safeguarding Adults Report Form** check that they can understand what is written and that all the necessary parts have been completed.  
     
   If the report is being made by the adult themselves or a member of the public, they will fill in the safeguarding report form gaining the details with the person contacting them.
3. They will Inform, reassure, and advise the **person making the report** e.g. what to do/what not to do. They will explain what will happen next and reinforce the need for confidentiality.
4. They will consider what is known about the situation, what the risks are, what is known of **the views of the adult**, whether they have given their consent to the report being made and whether they might be considered to be an ‘adult at risk’.   
     
   They will find out whether the person making the report believes the adult has the mental capacity to make decisions about what safeguarding actions they want to be taken (they are not expected to assess this, only provide their opinion).  
     
   They will decide if they need to **contact the adult** to get more information, determine their wishes, or explain what actions they need to take.
5. They will ensure that the **adult has been given information** about the process and what will happen next.   
     
   **They will ONLY do this if they have a known safe way of contacting them.**

#### Taking Action

#### In all situations they should ensure those within Commonwealth Games Wales who can act (within their remit) to prevent further harm have the information to do so. This includes supporting the person at risk. Depending on the situation they may need to pass information to and work together with other organisations such as the Police and the Local Authority safeguarding team.

1. **Consult and Decide**If necessary, they will consult with the Local Authority/the Police and decide which of the following actions need to be taken.
2. **Contact the police** (where the crime took place)

**If**:

* a serious crime has been committed.
* a crime has been committed against someone without the mental capacity to contact the police themselves.
* the adult has asked them to make a report to the Police on their behalf because they are unable to themselves.

1. **Make a referral/report to the Local Authority Safeguarding Adults Team or Multi-Agency Safeguarding Hub (MASH)** (where the adult lives) if they believe they may be an **adult at risk  
   AND**

* the adult appears not to have the mental capacity to make decisions about their own safety and well-being.
* the risk is from a person employed or volunteering in work with adults with care and support needs (including within a sports organisations).
* there are other ‘adults at risk’ (e.g. another family member, another club member or other people using a service).

If a child is at risk they must also make a child safeguarding referral to the Local Authority. This includes all situations where there is domestic abuse within the household where the child lives.  
  
**If they are unsure whether or not to make a referral/report they will ask for advice by contacting the Local Authority Safeguarding Adults Team/Multi-agency Safeguarding Hub and discuss the situation with them without disclosing the identity of the adult or the person who may be causing harm**

1. **Use policy and procedures to stop harm within Commonwealth Games Wales**If the person who may be causing harm is a person involved in Commonwealth Games Wales in whatever capacity, they will inform the Chief Executive.  
     
   They will decide what policy and procedures Commonwealth Games Wales will use to decide which actions will be taken e.g. breach of code of conduct, disciplinary procedures, breach of contract.  
     
   They will agree what short term arrangements can be put in place to enable the adult, who may be being harmed, to be able to continue participating in Commonwealth Games Wales/their sport.   
     
   The arrangements made must respect the rights of the person who may be causing harm and must be consistent with the relevant policy and procedures.
2. If statutory agencies are involved they will **work together** with them to agree the next steps. E.g. the Police may need to interview an employee before a disciplinary investigation is conducted.   
     
   They will attend and contribute to any safeguarding adults strategy or case meetings that are called by the Local Authority.  
     
   If statutory agencies say that they will not be taking any action in relation to a referral this should not stop Commonwealth Games Wales taking internal steps to safeguard the adult. E.g. the Police may decide not to pursue a criminal investigation where there is an allegation against an employee, but Commonwealth Games Wales should still follow its disciplinary procedure.
3. They will decide who in Commonwealth Games Wales will **maintain contact with the adult** to consult with them, keep them informed and make sure they are receiving the support they need.   
     
   Unless advised not to by the Police or Local Authority, and only if there is a safe way to do so, they will contact the adult to let them know about the actions they have taken and the outcomes so far. They will find out if the actions taken are working, what matters to them, what they would like to happen next and what outcomes they want to achieve.
4. They will ensure **records are complete and stored securely**. Collate monitoring information, including feedback from the person who was at risk of harm and **report to senior management team/ the Board as requested**.

## Section 3: Appendices

## Appendices

### Appendix 4 - Safeguarding Adults Report Form

To be completed as fully as possible if you have concerns regarding an adult.

If it is safe to do so, it is important to inform the adult about your concerns and that you have a duty to pass the information onto the safeguarding lead. The Safeguarding Lead will then look at the information and start to plan a course of action.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Section 1 – Details of adult (you have concerns about) | | | | | |
| Name of adult | |  | | | |
| Address | |  | | | |
| Date of Birth/ Age | |  | | | |
| Contact number | |  | | | |
| Emergency contact if known | |  | | | |
| Consent to share information with emergency contact? | |  | | | |
| Section 2 – Details of the person completing this form/ Your details | | | | | |
| Name | |  | | | |
| Contact phone number(s) | |  | | | |
| Email address | |  | | | |
| Line manager or alternative  contact | |  | | | |
| Name of organisation | |  | | | |
| Your Role in organisation | |  | | | |
| Section 3 – Details of concern | | | | | |
| Please explain why you are concerned. Please give details about what you have seen/been told/other that makes you believe the adult is at risk of harm or is being abused or neglected (include dates/times/evidence from records/photos etc.) | | | | | |
| Date/ Time | What happened | | | | |
|  |  | | | | |
|  |  | | | | |
|  |  | | | | |
|  |  | | | | |
|  |  | | | | |
| Section 5 – Details of the person thought to be causing harm (if known) | | | | | |
| Name | |  | | | |
| Address | |  | | | |
| Date of Birth/Age | |  | | | |
| Relationship/connection to adult | |  | | | |
| Role in organisation | |  | | | |
| Do they have contact with other adults at risk in another capacity? E.g. in their work/family/as a volunteer | |  | | | |
| Section 6 - Have you discussed your concerns with the adult? What are their views,  What have they stated about what they want to happen and what outcomes they want? | | | | | |
|  | | | | | |
| Section 6A – Reasons for not discussing with the adult | | | | | |
| Discussion would put the adult or others at risk. Please explain: | | | | |  |
| Adult appears to lack mental capacity. Please explain: | | | | |  |
| Adult unable to communicate their views. Please explain: | | | | |  |
| Section 7 – Risk to others | | | | | |
| Are any other adults at risk Yes/No/Not known – delete as appropriate  If yes please fill in another form answering questions 1-6 | | | | | |
| Are any children at risk Yes/No/Not known Delete as appropriate  If yes please fill in a safeguarding children referral form and attach to this. | | | | | |
| Section 8 – What action have you taken if any /agreed with the adult to reduce the risks? | | | | | |
| Actions: e.g. person causing harm suspended, session times changed. | | | | | |
| Section 9: Other agencies contacted | | | Who contacted/reference number/contact details/advice gained/action being taken | | |
| Police | | |  | | |
| Ambulance | | |  | | |
| Other – please state who and why: | | | | | |
| Section 10: Contact with others | | | | | |
| Who else has been informed of this issue? – and what was the reason for information sharing | | | | | |
| Consultation with Safeguarding Lead | | | | Dates and times | |
|  | | | |  | |
|  | | | |  | |
|  | | | |  | |
| Completed Form copied to Safeguarding Lead; Date and time | | | | | |
| Signed: | | | | | |
| Date: | | | | | |

|  |
| --- |
| **OFFICE USE ONLY** |
| Section 11 – Sharing the concerns (To be completed by Safeguarding Lead) |
| Details of your contact with the adult at risk of harm. Have they consented to information being shared outside of Commonwealth Games Wales? |
| Details of contact with the Local Authority Safeguarding Team/MASH where the adult at risk of harm lives – advice can be still sought without giving personal details if you do not have consent for a referral. |
| Details of any other agencies contacted: |
| Details of the outcome of this concern: |

### Appendix 5 – Anti-Harassment and Bullying Policy

1. **About this policy**
   1. Commonwealth Games Wales (“we”, “CGW”) are committed to providing a working environment free from harassment and bullying and ensuring all CGW Personnel are treated, and treat others, with dignity and respect. We recognise that harassment or bullying can occur both in and outside the workplace, such as on business trips or at work-related events or social functions or during a Commonwealth Games. The purpose of this policy is to set out a framework for CGW Personnel to deal with any harassment or bullying that occurs by other CGW Personnel.
   2. This policy may be amended at any time.
2. **Who does this policy apply to?**
   1. This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, interns and Team Wales Members (Collectively “CGW Personnel”).
3. **Who is responsible for this policy?**
   1. The board of directors (the Board) has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Chief Executive.
   2. The Chief Executive shall have day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
   3. CGW Personnel should disclose any instances of harassment or bullying of which they become aware to the Chief Executive.
4. **What is harassment?**
   1. Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
   2. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
   3. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
   4. Harassment may include, for example:
      1. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
      2. continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
      3. sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
      4. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
      5. racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
      6. outing or threatening to out someone as gay or lesbian;
      7. offensive e-mails, text messages or social media content; or
      8. mocking, mimicking or belittling a person's disability.
   5. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.
5. **What is bullying?**
   1. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.
   2. Bullying may include overbearing and intimidating levels of supervision or inappropriate derogatory remarks about someone's performance. However, legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.
6. **If you are being harassed or bullied: informal steps**
   1. If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to the Chief Executive, who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to the Chief Executive because the complaint concerns him or her, then you should speak informally to the HR Department. If this does not resolve the issue, you should follow the formal procedure below.
   2. If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact the HR Department informally for confidential advice.
   3. If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.
7. **Raising a formal complaint**
   1. If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to the Chief Executive. If the matter concerns the Chief Executive, you should submit it to the HR Department.
   2. Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
   3. As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.
8. **Formal investigations**
   1. We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.
   2. We will arrange a meeting with you, usually within five working days of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a representative of your choice, who must respect the confidentiality of the investigation.
   3. Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a representative of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.
   4. We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser or bully.
   5. It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
   6. At the end of the investigation, the investigator will submit a report to the Chief Executive. The Chief Executive will arrange a meeting with you, usually within five working days of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a representative to the meeting. A copy of the report and the Chief Executive’s findings will be given to you and to the alleged harasser.
9. **Action following the investigation**
   1. If the Chief Executive considers that harassment or bullying has occurred, prompt action will be taken to address it.
   2. Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.
   3. Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.
   4. Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure.
10. **Appeals**
    1. If you are not satisfied with the outcome you may appeal in writing to the Board, stating your full grounds of appeal, within 21 working days of the date on which the decision was sent or given to you.
    2. We will hold an appeal meeting, normally within 21 working days of receiving your written appeal.
    3. We will confirm our final decision in writing, usually within 21 working days of the appeal hearing. This is the end of the procedure and there is no further appeal.
11. **Protection and support for those involved**
    1. CGW Personnel who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the appropriate Disciplinary Procedure.
12. **Confidentiality and record-keeping**
    1. Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.
    2. Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Privacy Notice.