



# Roehampton Club

## Safeguarding Adults Policy

### 1. Key Information

1.1 Roehampton Club Ltd is referred to in this document as the Club.

1.2 Roehampton Club is committed to creating and maintaining a safe and positive environment for all individuals involved with the Club. This policy applies to club Members, employees, volunteers or anyone visiting the Club. Club employees and volunteers are additionally subject to more extensive guidance and training requirements.

1.3 Safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or is at risk of, abuse or neglect; and;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Principles in relation to adults at risk

1.4 The Care and Support Statutory Guidance Section 14.13 sets out the following six key principles which underpin all adult safeguarding work:

- Empowerment: People being supported and encouraged to make their own decisions and informed consent.
- Prevention: It is better to take action before harm occurs.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: Accountability and transparency in delivering safeguarding.

1.5 Making safeguarding personal is the concept that adult safeguarding should be person led and outcome focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control. As well as improving quality of life, well-being and safety.

Wherever possible discuss safeguarding concerns with the adult to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

The principles of the Mental Capacity Act 2005 (MCA) state that every individual has the right to make their own decisions and provides the framework for this to happen. **(Appendix 1 – Guidance on making decisions)**

1.6 In addition, Roehampton Club recognises the following principles which underpin our work with all groups and individuals who may have additional needs for support and protection:

- It is every adult's right to be protected from abuse irrespective of their age, gender identity, faith or religion, culture, ethnicity, sexual orientation, background, economic position, marital status, disability or level of ability.
- All staff and volunteers share the responsibility for the protection of adults at risk and will show respect and understanding for their rights, safety and welfare.
- The additional vulnerability of disabled adults (including those with invisible disabilities, learning and communication differences) is recognised.
- Allegations of abuse or concerns about the welfare of any adult will be treated seriously and will be responded to swiftly and appropriately.
- Roehampton Club recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Boards.
- Confidentiality will be maintained appropriately at all times and the adult's safety and welfare must be the overriding consideration when making decisions on whether or not to share information about them.
- Roehampton Club will support all adults to understand their roles and responsibilities with regards to safeguarding and protecting adults at risk, including the responsibility to report all concerns in line with Roehampton Club safeguarding adults policy and procedures.
- All participants involved in Club activities have the right to be listened to with respect and to be heard.

## **2. Guidance and Legislation**

2.1 The practices and procedures within this policy are based on the principles contained within the UK's and legislation and Government Guidance and have been developed to complement the Safeguarding Adults Boards policy and procedures, and take the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005

- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 2018

### **3. Responsibilities and implementation**

3.1 Roehampton Club will seek to promote the principles of safeguarding by:

- Implementing appropriate recruitment procedures to assess the suitability of volunteers and staff working with vulnerable groups.
- Following procedures to report welfare concerns and allegations about the behaviour of adults and ensure that all staff, volunteers, parents and participants, including adults at risk, are aware of these procedures.
- Directing club staff, volunteers and coaches to appropriate safeguarding training and learning opportunities, where this is appropriate to their role.

### **4. Information relating to the recruitment and training of staff**

#### *4.1 Recruitment*

- 4.1.1 The Club recognises the necessity of ensuring that all reasonable steps are taken to ensure unsuitable people are prevented from having contact or working with adults-at-risk.
- 4.1.2 For employees (and volunteers in regulated activity roles) pre-selection checks will include the following:
- (a) All employees must complete an application form against a clear job specification. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
  - (b) Consent should be obtained from an applicant to seek information from the Disclosure and Barring Service (DBS). (Individuals applying for a golfing role will must have their DBS processed through England Golf – see [www.englandgolf.org](http://www.englandgolf.org) for further details.)
  - (c) Two confidential references, including one regarding previous work with children (if applicable). These references will be taken up and confirmed through telephone contact prior to commencement of employment.
  - (d) Evidence of identity should be provided (eg. passport or driving licence with photo).

## 4.2 *Interview and induction*

All employees will be required to undergo an interview carried out to acceptable protocol and recommendations. All employees should receive a formal or informal induction, during which:

- 4.2.1 A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- 4.2.2 Their qualifications should be substantiated.
- 4.2.3 The job requirements and responsibilities should be clarified.
- 4.2.4 Safeguarding procedures are explained and training needs are identified.
- 4.2.5 All staff, volunteers and coaches will be asked to read the Roehampton Club Code of Conduct relevant to their role, and sign to indicate their understanding and agreement to act in accordance with the code.

## 4.3 *Training*

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help employees to:

- 4.3.1 Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from unjustified allegations.
- 4.3.2 Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- 4.3.3 Respond to any concerns expressed by a vulnerable adult.
- 4.3.4 Work safely and effectively with vulnerable adults.

## **5. Incidents that must be reported/recorded**

5.1 If any of the following occur you should report this immediately to a member of staff who will record the incident:

- If you accidentally hurt an adult at risk.
- If he/she seems distressed.
- If you witness anything (including worrying content on devices, or overheard comments) which raises concerns that someone has acted inappropriately in relation to an adult at risk. Concerns will not always be directly related to Club activity - but if a vulnerable adult is deemed at risk, whatever the circumstances, this should be reported.

## **6. Signs and indicators of abuse and neglect**

6.1 Abuse can take place in any context. Abuse may be inflicted by anyone. Players, Members, staff, volunteers or coaches may suspect that an adult is being abused or neglected outside of the Club setting. **(Appendix 2 – Guidance on types of harm)**

There are many signs and indicators that may suggest someone is being abused or neglected, these 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.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- Self-harm.
- A fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.

## **7. Dealing with allegations or suspicions - General**

7.1 It is not the responsibility of the Club or any employee or officer of the Club to decide whether or not abuse, or any harm to an adult at risk has taken place. However, there is a responsibility to act on any concerns. This may include, for example, reports to the police or robust measures to manage any possible risk of abuse or harm to adults at risk.

## **8. Responding to disclosure of abuse**

8.1 If an adult indicates that they are being abused the person receiving the information should:

- Stay calm
- Listen carefully to what is said, allowing the adult to continue at their own pace, and take it seriously.
- Explain that it is likely the information will have to be shared with others - do not promise to keep secrets.
- Keep questions to a minimum, only ask questions if you need to identify/clarify what the person is telling you. Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- 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 and ask if they are happy for you to share the information in order for you to help them. As long as it does not increase the risk to the individual, you should explain to them that it is your duty to share your concern with your safeguarding lead.
- Record in writing what was said using the adult's own words as soon as possible.

**DO NOT:**

- Dismiss the concern.
- Panic or allow shock or distaste to show.
- Probe for more information than is offered.
- Make promises that cannot be kept.
- Conduct an investigation of the case.
- Make negative comments about the alleged perpetrator.

- 8.2 The Club assures all employees and Members that it will fully support and protect anyone who in good faith reports his/her concern that an employee, Member or visitor has abused or harmed, or may be abusing or harming, an adult at risk. The Club will view any victimisation or threatened victimisation (whether direct or indirect) of any person raising any concern or providing relevant information as a very serious matter.
- 8.3 The Club will expect any Member who is the subject of any complaint or allegation to provide full and constructive cooperation to the Club in seeking to resolve any issues arising. Every Member is expected to support the Club's safeguarding adults objectives.
- 8.4 The procedures set out in sections 9 and 10 below may be varied if, in the Board's opinion, the particular circumstances require it. The Club's approach will be based upon the Board's view of the risks in all of the circumstances.
- 8.5 The Club will not be precluded from taking appropriate safeguarding measures solely on the basis that a Member has not been convicted of any criminal offence nor been the subject of a finding of serious misconduct.
- 8.6 The Club will seek to keep information concerning the allegations and the identity of any individuals involved confidential. The Club may, however, provide information to the Police and/or Local Authority Adult Social Care Services in order to safeguard and promote a vulnerable adult's welfare.
- 8.7 Any concern relating to an employee will be dealt with in accordance with the Club's employment procedures.

## 9. Dealing with abuse/harm allegations or suspicions – Initial Process

**If a vulnerable adult requires urgent medical attention, an ambulance must be called and the receiving medic must be informed that the injury relates to a safeguarding concern.**

**If the safeguarding concern presents an immediate risk of significant harm, Local Authority Adult Social Care Services and/or Police should be called without delay.**

- 9.1 Any concern relating to a Member or visitor should be reported immediately to the Welfare Officer (**Appendix 4 – Useful Contacts**), Club's Duty Manager or the Chief Executive.
- 9.2 The Welfare Officer or Duty Manager will take any action urgently required to make the vulnerable adult safe and refer the concern to the HR Manager and Chief Executive at the earliest opportunity.
- 9.3 If the concerns are not serious and there is no concern relating to harm or abuse, the Chief Executive and HR Manager will seek to resolve issues and this may include a discussion and/or advice to any of the individuals concerned. In these circumstances the following provisions of this section (11) may not apply. However, we reserve the right to report all concerns to the police/LADO or NGB of the respective sport if we deem necessary.
- 9.4 If there are concerns that a vulnerable adult is being or may be being harmed or abused, the Chief Executive will consult with the Club's Chairman (and the full Board if necessary) with a view to urgent safeguarding action. This may include the relevant Member's immediate suspension, the involvement of police or LADO or referral to NGB. The interests of any vulnerable adult will be considered to be of paramount importance throughout.

If the concern relates to a golfing Member/employee/volunteer/visitor and/or occurred in a golfing context, England Golf must be informed at the earliest opportunity (using the following contact details):

**Safeguarding Team (direct line) 01526 351 856**

**[safeguarding@englandgolf.org](mailto:safeguarding@englandgolf.org)**

- 9.5 Where appropriate, the Chief Executive may, in consultation with the Chairman, inform the Police and/or Local Authority Adult Social Care Services, and consult with the Police and/or Local

Authority Adult Social Care Services as to what to do. It is likely to be appropriate where there is a suspicion that a criminal offence may have been committed or there is a possible risk of harm to a vulnerable adult that a report to the Police and/or Local Authority Adult Social Care Services will be required.

In relation to concerns shared with England Golf, a discussion between the Club and the NGB will take place to determine which organisation will lead on the investigation.

- 9.6 If a report to the Police and/or Local Authority Adult Social Care Services is made, the Club will refrain from any action which might hinder any related Police and/or Local Authority Adult Social Care investigation.

## **10. Dealing with abuse/harm allegations or suspicions – Further Process**

- 10.1 Once the Police and/or Local Authority Adults Social Care have completed their investigation(s) and confirmed that the following actions regarding the Member involved would not impede any such investigation (and subject to any Adult Social Care Plan), the Chief Executive will:

- investigate the allegations or suspicions and collate relevant information; and
- give the relevant Member an early opportunity to provide an open oral explanation and account of events at the time of any alleged incident(s). The Club will expect the Member to be truthful and co-operative in seeking to resolve any issues.

(Again, if the concern relates to golfing activity, a discussion between the Club and England Golf will first take place to determine which organisation will lead on this part of the process.)

- 10.2 In cases where the Club leads during this stage: if the Chief Executive considers that any allegations or suspicions are credible and does not consider any explanation offered by the relevant Member satisfactory, the Member will be provided with written information as to any allegations or suspicions, and related evidence, and be given an opportunity to attend a meeting with three directors of the Club to provide a further explanation and/or representations. The Member may be accompanied by a friend or representative who may be legally qualified.

In cases where England Golf lead during this stage: the England Golf Safeguarding Team will complete a risk assessment based on all information available to them. This risk assessment will inform their recommendation as to whether the individual should participate in the sport (with or without restrictions) or whether sanctions should be invoked under the England Golf Safeguarding Regulations 2021 (full details available at [www.englandgolf.org](http://www.englandgolf.org)).

- 10.3 The matter will then be referred to the Board for consideration. Before the Board considers the matter the Member will be given a reasonable opportunity to provide a further written explanation and written representations to the Board. When considering the matter:

- the Board will adopt a risk based approach and consider the best interests of the Club as a whole, taking into account all of the circumstances including but not limited to a paramount concern for the interests of any vulnerable adult concerned and adult Members generally, the



Member's representations and response generally, the outcome of any police and/or adult social care investigation and fairness to all those involved; and

- the Board will consider the circumstances generally and whether any allegations remain credible or whether concerns have been resolved; and
- the Board will decide what measures, if any, are appropriate.

Cases which have involved England Golf will include the Safeguarding Team in this decision-making process.

- 10.4 The Board shall not attempt to determine whether the Member is, or is not, guilty of any criminal offence or other misconduct.
- 10.5 Any decision to suspend or terminate a membership may be subject to reconsideration in accordance with the Club's Rules.
- 10.6 Any decision to terminate a membership will be communicated in confidence to the Member and the vulnerable adult concerned (via a chosen advocate, if preferred) in writing with a summary of reasons.

## **11. Support to deal with the aftermath of abuse**

- 11.1 Consideration should be given to the kind of support that Members and staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process. In addition to Adult Social Care and GP and Health Services, the following may be useful in this regard:

*The British Association for Counselling Directory* is available from The British Association for Counselling, 1 Regent Place, Rugby CV21 2PJ, Tel: 01788 550899, Fax: 01788 562189.

*Victim Support* – Tel: 0845 30 30 900

*Samaritans* – 116 123

*The Ann Craft Trust* – 0115 951 5400

*Or contact the appropriate National Governing Body of the sport*

- 11.2 Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.

## 12. Consent

- 12.1 The Care Act 2014 statutory guidance advises that the first priority in safeguarding should always be to ensure the safety and well-being of the adult. **(Appendix 3 – Consent and information sharing)**
- 12.2 Adults have a general right to independence, choice and self-determination including control over information about themselves.
- 12.3 Roehampton Club does not expect staff, coaches or volunteers to support an adult who is felt to be vulnerable or at risk through their decision-making process but expects them to follow the Club's reporting process without delay so that they can clearly define the various options to help support the adult at risk to make a decision about their safety. As long as it does not increase the risk to the individual, it should be explained to them that it is the Club's duty to share their concern with the relevant NGB. Consent is not required to seek guidance or share information with the National Governing Body.
- 12.4 Adults may not give their consent to the sharing of safeguarding information outside of the organisation for a number of reasons. For example, they may be unduly influenced, coerced or intimidated by another person, they may be frightened of reprisals, they may fear losing control, they may not trust social services or other partners or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support may help to change their view on whether it is best to share information.
- 12.5 Those seeking to support the adult should consider the following:
- Explore the reasons for the adult's objections – what are they worried about?
  - Explain the concern and why you think it is important to share the information.
  - Tell the adult with whom you may be sharing the information with and why.
  - Explain the benefits, to them or others, of sharing information – could they access better help and support?
  - Discuss the consequences of not sharing the information – could someone come to harm?
  - Reassure them that the information will not be shared with anyone who does not need to know.
  - Reassure them that they are not alone and that support is available to them.
- 12.6 If the adult continues to refuse intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners their wishes should be respected.
- 12.7 However, there are a number of circumstances where those seeking to support the adult can reasonably override such a decision, including but not limited to:
- It appears that the adult lacks the mental capacity to make that decision (this must be properly explored and further guidance should be sought from the relevant NGB).
  - Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent.

- Other people are, or may be, at risk, including children.
- A serious crime has been committed / may be prevented.
- Individuals in a Position of Trust are implicated.

In such circumstances, it is important to keep a careful record of the decision-making process and guidance should be sought from the relevant NGB. Legal advice will be sought where appropriate. If the decision is to take action without the adult's consent, then unless it is unsafe to do so, the adult should be informed that this is being done and of the reasons why.

### **13. Status of the Policy, Guidance and Procedures**

The Club will from time-to-time change and update these documents. As well as periodic updates, they will be reviewed whenever there is a major change in legislation. They represent the Club's approach to the matters with which they deal but are not intended to create any legally enforceable obligation upon the Club or any Member. Insofar as they are inconsistent with the Club's Rules or Memorandum and Articles, then the Rules or Memorandum and Articles prevail.

February 2022

# Appendix 1

## Capacity – Guidance on making decisions

The issue of capacity or decision making is a key one in safeguarding adults. It is useful for organisations to have an overview of the concept of capacity.

We make many decisions every day, often without realising. We make so many decisions that it's easy to take this ability for granted.

But some people are only able to make some decisions, and a small number of people cannot make any decisions. Being unable to make a decision is called "lacking capacity".

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, and physical ill health.

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

The MCA is about making sure that people over the age of 16 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 specific decisions.

Our ability to make decisions can change over the course of a day.

Here are some examples that demonstrate how the timing of a question can affect the response:

- 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.

In each of these examples, it may appear as though the person cannot make a decision. But later in the day, presented with the same decision, they may be able to at least be involved.

The MCA recognises that capacity is decision-specific, so no one will be labelled as entirely lacking capacity. The MCA also recognises that decisions can be about big life-changing events, such as where to live, but equally about small events, such as what to wear on a cold day.

To help you to understand the MCA, consider the following five points:

1. Assume that people are able to make decisions, unless it is shown that they are not. If you have concerns about a person's level of understanding, you should check this with them, and if applicable, with the people supporting them.
2. Give people as much support as they need to make decisions. You may be involved in this – you might need to think about the way you communicate or provide information, and you may be asked your opinion.
3. People have the right to make unwise decisions. The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.
4. If someone is not able to make a decision, then the person helping them must only make decisions in their "best interests". This means that the decision must be what is best for the person, not for anyone else. If someone was making a decision on your behalf, you would want it to reflect the decision you would make if you were able to.
5. Find the least restrictive way of doing what needs to be done.

Remember

- You should not discriminate or make assumptions about someone's ability to make decisions, and you should not pre-empt a "best-interests" decision merely on the basis of a person's age, appearance, condition, or behaviour.
- When it comes to decision-making, you could be involved in a minor way, or asked to provide more detail. The way you provide information might influence a person's ultimate decision. A person may be receiving support that is not in line with the MCA, so you must be prepared to address this.

## Appendix 2

### Guidance on types of harm

The Care Act 2014 recognises 10 categories of abuse that may be experienced by adults.

#### Self-neglect

This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

#### 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. It also includes so called 'honour' based violence.

#### Discriminatory

Discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or 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, for example, 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 rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

#### Financial or material

This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of

property, possessions or benefits.

#### Neglect/Acts of omission

This includes ignoring medical or physical care needs, failing to provide access to appropriate health/social care or educational services, the withholding of 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

Not included in the Care Act 2014 but also relevant to safeguarding adults in sport and physical activity:

#### Cyber Bullying

Cyberbullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

#### Forced marriage

This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

#### Mate Crime

A 'mate crime' is when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual. Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

#### Radicalisation

The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

## Appendix 3

### Consent and information sharing

Workers and volunteers within sports and physical activity organisations should always share safeguarding concerns in line with their organisation's policy, usually with their safeguarding lead or welfare officer in the first instance, except in emergency situations. As long as it does not increase the risk to the individual, the worker or volunteer should explain to them that it is their duty to share their concern with their safeguarding lead or welfare officer.

The safeguarding lead or welfare officer will then consider the situation and plan the actions that need to be taken, in conjunction with the adult at risk and in line with the organisation's policy and procedures and local safeguarding adults board policy and procedures.

To make an adult safeguarding referral you need to call the local safeguarding adults team. This may be part of a MASH (Multi-Agency Safeguarding Hub). A conversation can be had with the safeguarding adults team without disclosing the identity of the person in the first instance. If it is thought that a referral needs to be made to the safeguarding adults team, consent should be sought where possible from the adult at risk.

Individuals may not give their consent to the sharing of safeguarding information with the safeguarding adults team for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view on whether it is best to share information.

If they still do not consent, then their wishes should usually be respected. However, there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people or a serious crime has been committed. This should always be discussed with your safeguarding lead and the local authority safeguarding adults team.

If someone does not want you to share information outside of the organisation or you do not have consent to share the information, ask yourself the following questions:

- Is the adult placing themselves at further risk of harm?
- Is someone else likely to get hurt?
- Has a criminal offence occurred? This includes: theft or burglary of items, physical abuse, sexual abuse, forced to give extra money for lessons (financial abuse) or harassment.
- Is there suspicion that a crime has occurred?

If the answer to any of the questions above is 'yes' - then you can share without consent and need to share the information.



When sharing information there are Seven Golden Rules that should always be followed:

1. Seek advice if in any doubt
2. Be transparent - The Data Protection Act (DPA) is not a barrier to sharing information but to ensure that personal information is shared appropriately; except in circumstances where by doing so places the person at significant risk of harm.
3. Consider the public interest - Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
4. Share with consent where appropriate - Where possible, respond to the wishes of those who do not consent to share confidential information. You may still share information without consent, if this is in the public interest.
5. Keep a record – Record your decision and reasons to share or not share information.
6. Accurate, necessary, proportionate, relevant and secure - Ensure all information shared is accurate, up-to-date; necessary and share with only those who need to have it.
7. Remember the purpose of the Data Protection Act (DPA) is to ensure personal information is shared appropriately, except in circumstances where by doing so may place the person or others at significant harm.

## Appendix 4

### Useful contacts

#### The Welfare Officer(s) for Roehampton Club

Susan Barton – Susan.Barton@roehamptonclub.co.uk

Simon Baker – Simon.Baker@roehamptonclub.co.uk

Stuart Reeks – stuart.reeks@roehamptonclub.co.uk

The role of the Welfare Officer is to take the lead in the Club on welfare and protection issues and ensure the appropriate action is taken when there is a potential /alleged abuse, bullying or poor practice. It is not their role to investigate fully any allegations made. The Welfare Officer will undertake safeguarding training provided by NGBs and others. Safeguarding concerns will be reported to the police/Local Authority Adult Social Services Department as appropriate.

#### Local Authority Adult Social Care

Wandsworth Borough Council 020 8871 7707 (Mon-Fri, 9am-5pm)

Email: accessteam@wandsworth.gov.uk

#### Wandsworth Borough Council Emergency Adult Social Care Duty Contact Team

020 8871 6000 (Mon-Fri 5pm-8am, and 24/7 at weekends and on Bank Holidays)

#### England Golf Safeguarding Team (for any golfing related queries or concerns)

01526 351 856

safeguarding@englandgolf.org