



## Safeguarding Adults at Risk Policy

For Sandford Parks Lido and Sandford Parks Lido (Trading) L

Sandford Lido Limited  
Edition one March 2020

# Contents

---

Introduction	2
Abbreviations	3
Key Roles within the policy	3
Staff Training	3
The Six Key Safeguarding Principles	4
Empowerment	4
Prevention	4
Proportionality	4
Protection	4
Partnership	4
Accountability	4
Safeguarding Adults at Risk Key Legislation and Government Initiatives	5
Sexual Offences Act 2003	5
Mental Capacity Act 2005	5
Safeguarding Vulnerable Groups Act 2006	5
Deprivation of Liberty Safeguards	5
Disclosure & Barring Service 2013	5
The Care Act 2014 – statutory guidance	5
Making Safeguarding Personal Guide 2014	6
How do I know if an adult is at risk?	6
Safeguarding Adults at Risk Definitions	6
Vulnerable adult	6
Adults at risk of harm	7
Safeguarding Adults at Risk	7
What is meant by abuse and neglect?	7
Procedures and supporting documents to safeguard adults at risk within the lido	8
Reporting concerns	8
Responding to concerns raised	8
Responding to concerns about a member of SPL staff or volunteer	9
Recording	9
Advice for the Lido DSL responding to an incident	9
Code of conduct	10
Safe Recruitment	10
Criminal records checks	10
References	10

Whistleblowing	10
Complaints	10
Links to other organisational policies and procedures	11
Delivering the safeguarding policy	11
Employees/Trustees/Volunteers	11
Stakeholders	11
Appendices	12
Appendix 1 SARF	12
Appendix 2 DSL Role	15
Appendix 3 Response Charts	16
Safeguarding Adults at Risk Response Chart 1 – Concerns regarding staff, volunteer/coach	16
	16
	16
	16
	16
Safeguarding Adults at Risk Response Chart 2 – Concerns regarding a visitor	17
Appendix 4 Code of Conduct	18
Appendix 5 Whistle Blowing Policy	21
Appendix 6 Contacts	23

## Introduction

Sandford Parks Lido (SPL) set in the heart of Cheltenham attracts an average of 150,000 visitors per season. Sandford Lido Limited is the charity set up to preserve and protect the Lido, creating an environment that enhances the health and wellbeing of our community, the charity is overseen by a Board of Trustees.

We believe that SPL have a duty of care to protect all adults at risk of abuse and safeguard their welfare irrespective of age, disability, gender, ethnicity, gender identity, religion or belief and sexual orientation.

The aim of this policy is to identify the adult safeguarding principles and apply measures to ensure we protect and assist adults at risk whilst they use our facilities. This policy will also provide employees with the necessary information to ensure they can recognise, manage and respond to safeguarding matters confidently to support the adults at risk and ensure the best outcome.

Where there are any concerns about a adult at risks safety and wellbeing information will only be shared with people who need to know, and procedures are clear about what should be shared and who with.

## Abbreviations

SPL:	Sandford Parks Lido
DSL:	Designated Safeguard Lead
OM:	Operations Manager
ASIF:	Adult Safeguarding Incident Form
CEO:	Chief Executive Officer

## Key Roles within the policy

The Chief Executive - Has overall responsibility for ensuring the implementation of the Safeguarding Adults at Risk Policy and holds responsibility for ensuring that our organisation operates within the procedures set out in this document and will liaise specifically with the Adult Safeguarding lead.

Adult Safeguarding Lead - The Designated Adult Safeguarding Lead (DSL) is a senior member of staff who has attended specialist training in safeguarding adults at risk. The lead will provide advice and training throughout our organisation and be the strategic lead should an incident occur. The lead will provide an update/report in advance of every Trustee meeting to be presented by the CEO. The adult safeguarding lead will act as the professional interface with other agencies, in conjunction with any cases where abuse is identified or suspected.

Duty Manager – Has the responsibility to activate the policy should they identify or become aware of an adult at risk. The Duty Manager will liaise with the DSL when appropriate to ensure they are aware of the incident.

All Staff - All staff have a duty to report suspected, alleged or actual harm or abuse involving an adult at risk. Staff should be aware of and follow our safeguarding policies.

## Staff Training

Awareness of this and all safeguarding policies and procedures is covered within the induction programme for all new employees.

All staff will receive training on safeguarding adults at a level commensurate with their roles.

SPL has conducted a training needs analysis for the entire facility and details of training arrangements/ information on adults at risk are as follows:

DSL and OM – <https://www.hsqe.co.uk/course/designated-safeguarding-lead-adults/>

Duty Manager – <https://www.hsqe.co.uk/course/designated-safeguarding-lead-adults/>

Whole Staff Team – In-house training given by the DSL and Duty Managers

Trustees and Volunteers – Access to the Safeguarding Adults at Risk Policy

Visitor – Information contained in the visitor code of conduct and displayed in safeguarding posters providing advice on reporting incidents which may concern them.

## The Six Key Safeguarding Principles

### Empowerment

People should be supported and encouraged to make their own decisions. This is achieved by:

- making services and information easy to understand
- giving people choice and control over decisions once the necessary information has been given
- asking people what they want from their visit and directing them appropriately

Within SPL we need to ensure that all visitors are given sufficient information and specific advice to facilitate a safe visit. Consideration should be given to items such as signage, initial visitor information and information relating to things such as locker tokens and location of services should they need to seek further assistance.

### Prevention

We should work together to stop abuse before it happens by:

- raising awareness about abuse and neglect
- training staff
- making sure clear, simple and accessible information is available about abuse and where people can get help

Within SPL we develop strategies and information which are easily understood detailing what constitutes abuse and how people can report it and seek help.

### Proportionality

It is important that we think about the risks involved and any response should be appropriate to the risk presented. We must respect the person, think about what is best for them and only get involved as much as needed.

This is where we should consider whether additional agencies should be called in to offer the right level of assistance for the vulnerable adult or if we actually need to get involved at all.

### Protection

We have a duty of care to ensure that we know what to do when abuse has happened:

- what to do if there are concerns raised by public or employees
- how to stop the abuse
- how to offer help and support for people who are at risk

### Partnership

During incidents of concern or confirmed abuse we should work in partnership with appropriate agencies, Police and local communities. Our visitors also have a part to play in preventing, detecting and reporting abuse.

### Accountability

Safeguarding is everybody's business. Everyone must accept that we are all accountable as individuals, services and as organisations.

Roles and responsibilities must be clear so that people can see and check how safeguarding is considered.

### Sexual Offences Act 2003

The Sexual Offences Act introduced a number of new offences concerning adults at risk and children. [legislation.gov.uk](http://legislation.gov.uk)

### Mental Capacity Act 2005

Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention. The Act is set up to empower and protect people who lack capacity.

[legislation.gov.uk](http://legislation.gov.uk)

### Safeguarding Vulnerable Groups Act 2006

Introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority. The Act places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance.

[legislation.gov.uk](http://legislation.gov.uk)

### Deprivation of Liberty Safeguards

Introduced into the Mental Capacity Act 2005 and came into force in April 2009. Designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm.

[scie.org.uk](http://scie.org.uk)

### Disclosure & Barring Service 2013

Criminal record checks: guidance for employers – How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS).

[www.gov.uk/dbs-update-service](http://www.gov.uk/dbs-update-service)

### The Care Act 2014 – statutory guidance

The Care Act introduces new responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

[www.gov.uk/](http://www.gov.uk/)

## Making Safeguarding Personal Guide 2014

This guide is intended to support councils and their partners to develop outcome-focused, person-centred safeguarding practise.

[www.local.gov.uk](http://www.local.gov.uk)

### How do I know if an adult is at risk?

Some adults are particularly vulnerable to be hurt or abused because they have a disability, illness, or impairment and need help and support. Depending on others can sometimes make them vulnerable and at risk of abuse, very often from people they know. It isn't always intentional... but it is still abuse.

Abuse of a vulnerable adult may include the following:

- Physical or sexual
- Not being looked after properly
- Being bullied or humiliated
- Not being allowed contact with family or friends
- Money is being taken from them without permission

Abuse can be the result of a single act or may continue over months or years. It can be accidental or a deliberate act - the result on the victim is the same.

In the event of a safeguarding issue, follow this process:

1. Seek consent from the person concerned. If you feel that they do not have capacity to consent, you can act without consent but you must log your decision on the ASIF.
2. Collect all available relevant facts and appropriate information.
3. Make a written record of the concern (ASIF).
4. Tell the person involved what you are going to do about the concern and note any views that they may have regarding how they wish the matter to be dealt with.
5. Tell only the people who need to know – such as your DSL.
6. Consider the balance between listening to someone's wishes and needing to refer information where others may be at risk.
7. Inform the person involved about the outcome of any process.

### Safeguarding Adults at Risk Definitions

The definitions and terminology surrounding safeguarding adults at risk from history of safeguarding legislation up until the Care Act 2014.

#### Vulnerable adult

The definition of "vulnerable adult" originated in the 1997 Consultation Document "Who Decides?" 'No Secrets' was then published as government guidance for developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. Introduced in 2000 it encouraged organisations to work together to protect vulnerable adults from abuse.

The definition and use of “vulnerable adult” from No Secrets (2000) will have been used in many older safeguarding vulnerable adults policy and procedures but should now be replaced with the new definition from the Care Act (2014).

## Adults at risk of harm

We have now moved away from the terminology of ‘vulnerable adults’ towards ‘adults at risk of harm’, usually shortened to ‘adults at risk’ in policies and procedures. There may also be reference to an ‘adult with a care and support need’.

The policy and procedures that any organisation implements should reflect this and include the current definition of adults at risk rather than that of vulnerable adults.

The Care Act 2014 makes it clear that abuse of adults links to circumstances rather than the characteristics of the people experiencing the harm. Labelling groups of people as inherently ‘vulnerable’ is seen to be disempowering.

## Safeguarding Adults at Risk

“Adult safeguarding” is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities.’ – Care Act 2014

All organisations have a duty to ensure that the welfare of all adults is ensured. As part of this they need to understand when to implement their safeguarding adults reporting procedures.

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.

### What is meant by abuse and neglect?

Abuse is the violation of an individual's human and civil rights by someone else. Abuse might be unintentional; the important factor is whether the adult at risk is harmed or not. Abuse can be:

- **Physical abuse** - any form of assault, over-medication, restraint or poor manual handling practice.
- **Sexual abuse** - rape or any sexual act which was not actively consented to or the person did not have the capacity to understand.
- **Psychological / emotional abuse** - threats, intimidation, coercion, harassment or bullying.
- **Financial abuse** - theft, borrowing money without repayment and any pressure in connection with wills or property, possessions or benefits.
- **Neglect** - ignoring medical or physical needs, not providing access to appropriate care, the withholding of the necessities of life, such as medication, adequate food, water and heating.

- **Discriminatory abuse** - all forms of harassment, slurs or similar treatment based on a person's disability, ethnic origin, gender or sexuality. This is often called hate crime.
- **Institutional abuse** - repeated instances of poor care, ill treatment of vulnerable adults, and unsatisfactory professional practice. This is often an indicator of more serious problems.
- **Modern slavery** - slavery, human trafficking, forced labour and domestic servitude.
- **Self-neglect** - this covers a wide range of behaviour; neglecting to care for personal hygiene, health or surroundings and includes behaviour like hoarding which puts the person, or others, at risk.

### Who Might Abuse Adults?

Abuse and neglect might be carried out by anyone in contact with adults, even by people employed to provide care.

There may be indicators that adults are experiencing harm from people within your organisation, such as volunteers, members of staff, or other members of the public. Or they may be experiencing harm from those connected with their life outside your organisation, such as a carer or a spouse.

This may include:

- Spouses, friends, family and neighbours
- People employed to provide care
- Paid staff or professionals
- Volunteers
- Strangers

## Procedures and supporting documents to safeguard adults at risk within the lido

### Reporting concerns

It is not the responsibility of employees, volunteers or visitors to decide whether or not an adult has been abused, however there is a responsibility to act on any concerns by reporting these to the appropriate person within SPL.

If a member of the public has a concern regarding the welfare of an adult at risk, they should report this to a member of the SPL team. It's important that we ensure public know who they can contact and that staff are clearly visible by their uniform.

We recognise that people are often concerned about passing on their concerns however we should encourage people to trust their instincts and pass on any concerns, in the knowledge that they will be responded to appropriately.

Our DSL's (Designated Safeguarding Leads) are the persons within SPL with primary responsibility for managing and reporting concerns, appendix 2 contains the description of the DSL role.

### Responding to concerns raised

If a concern is reported to a member of SPL staff concerning a member of public they will follow the procedures written in Adult response chart 2 (see appendix 3). The member of staff will report the concern to the Lido's DSL on duty who will control the incident and complete the Safeguarding Adults at Risk Form, SARF (appendix 1).

They must ensure the immediate safety of the adult. If medical attention is required, the DSL will call the Police and ambulance service highlighting that there is a vulnerable adult protection concern.

## Responding to concerns about a member of SPL staff or volunteer

If a concern is raised about a member of staff or volunteer the DSL will follow procedures written in response chart 1 (see appendix 3). A written report will be kept of all allegations made, details of how the allegation was followed up and any actions taken and decisions made. The Operations Manager must be informed as soon as possible of a concern about a member of staff or volunteer and a decision will be made as to whether the employee or volunteer be suspended from duties pending a full investigation.

SPL would await the outcome of any criminal investigation, or an appropriate regulatory authority investigation before initiating disciplinary action. Disciplinary action may be taken on its own or in addition to criminal proceedings.

The written report will be held in the personnel file and a copy given to the member of staff.

## Recording

It is important that all concerns are recorded - including information about:

- the concern
- how it was responded to
- where it was reported to
- what the outcome of this report was.

SPL has a Safeguarding Adults at Risk Form (SARF) Appendix 1 which should be completed by the DSL.

## Advice for the Lido DSL responding to an incident

The DSL should listen carefully to what the adult at risk says about their concerns, and offer reassurance that they will be kept safe and explain that the information may need to be passed on to the Police.

Do not apply pressure to the adult at risk for information or cross examine them in any way as it could prejudice any subsequent Police investigation.

The DSL must keep an open mind and not make assumptions about what is being said and always take concerns seriously. Be honest and explain it isn't possible to keep what they are saying secret.

Try to reassure the adult at risk by explaining what action you will be taking to keep them safe.

Only share information about the incident to those who need to know. Ensure confidentiality is maintained at all times. If the adult at risk has carers and they are not implicated in the concern, ensure they are notified at the earliest opportunity.

Record all conversations and ensure the SARF is completed in full.

Completed forms must be given as soon as possible to the Operations Manager. The records will be kept confidentially and only shared when appropriate.

## Code of conduct

Codes of conduct for staff/volunteers, parents/guardians have been developed to ensure that all those involved in SPL are clear on what behaviour is expected and what will not be tolerated. Failure to comply with codes of conduct may result in dismissal/exclusion from SPL.

Appendix 4 contains the Code of Conduct for all employees and volunteers working on behalf of Sandford Lido Limited and Sandford Parks Lido (Trading) Ltd.

All users/visitors are expected to follow the code of conduct in Appendix 4

## Safe Recruitment

SPL have developed recruitment and selection procedures for staff/volunteers to help screen and discourage those who are not suitable to work with children or adults at risk. SPL's safe recruitment policy and procedures apply to all roles involving contact with or responsibility for children, young people and adults at risk which includes verifying relevant qualifications, obtaining references and criminal records checks where the role is eligible for checking.

## Criminal records checks

In England and Wales the Disclosure and Barring Service (DBS) helps employers to make safer recruitment decisions. SPL has identified which roles at SPL are eligible for DBS checking, and undertakes checks as part of its recruitment process.

## References

SPL requests two references for all new employees. One of these must be from a current or most recent employer. If the applicant has recently finished full time education and has not previously been employed then a reference will be requested from their academic institution. If the applicant has been self-employed a reference will be requested from an individual they have dealt with professionally such as a client, accountant or bank manager.

Personal references from friends or relatives are not acceptable. The reference form specifically states where a post involves substantial access to and responsibility for children or vulnerable adults, and makes clear that SPL is committed to the welfare and protection of both, and wishes to know if there is any reason at all to be concerned about this applicant's suitability for this type of role.

## Whistleblowing

It is important that people within SPL have the confidence to come forward to speak or act if they are unhappy with anything. Whistleblowing occurs when a person raises a concern about dangerous or illegal activity, or any wrongdoing within their organisation.

Whistleblowing can involve sharing potentially vital information about health and safety risks, environmental factors, harm of children or vulnerable adults, covering up for someone and much more. Any of these factors should be addressed immediately, so 'blow the whistle' as early as possible to prevent any real damage being done. Our whistle blowing policy can be found in Appendix 5

## Complaints

To ensure that SPL has an open culture where visitors and staff feel able to express any concerns, SPL has developed a procedure for dealing with complaints from a visitor, worker, volunteer, parent or carer. This is linked to SPL's complaints procedures, and will ensure the provision of support and advocacy for the people involved.

Our complaints and grievance procedure are available on our website [www.Sandfordparkslido.org.uk](http://www.Sandfordparkslido.org.uk)

## Links to other organisational policies and procedures

This policy cross references other relevant SPL policies and procedures, including SPL's:

- Pool Safety Operating Procedures – Normal Operating Plan and Emergency Action Plan
- Complaints and grievance procedures
- Disciplinary procedures
- Equal Opportunity Policy

## Delivering the safeguarding policy

An implementation plan is being developed to identify how best to:

- Disseminate the policy across SPL. Identify and address possible barriers to successful implementation
- Monitor the policy in the future, identifying; what can be measured, by whom, how and when, the criteria for measuring success and when it will be reviewed and updated.
- Recognise the needs of all adults at risk attending SPL and possible barriers they may face and needs that the adult at risk may have (such as communication, a disability, etc.).

The plan will be owned and approved by the Trustees. It will include clarifying roles of the following:

### Employees/Trustees/Volunteers

All employees/trustees and volunteers will be given a copy of the Safeguarding Adults at Risk Policy during their induction and will undertake safeguarding staff training relevant to their role. Employees and volunteers are required to sign the relevant code of conduct.

DSL's will have undertaken specific training to assist them with this role.

Safeguarding is a standing agenda item on all Board meetings. Trustees will be given a copy of the Safeguarding Adults at Risk Policy and informed at Trustee meetings of when incidents occur, whilst maintaining confidentiality of specific cases. The Board of Trustees will identify one of the Trustee as a Safeguarding Champion.

### Stakeholders

All stakeholders will be given access to a copy of the Safeguarding Adults at Risk Policy and key stakeholders will be consulted as part of the review process.

Aspects of the policy will be prominently displayed in public areas to ensure visitors know how to get assistance or inform us of safeguarding concerns.

The Safeguarding Adults at Risk Policy will be available to be viewed on our website.



Are you reporting your own concerns or concerns raised by someone else?

Name of person raising concerns

Contact details of this person

Identity and whereabouts of perpetrator

Does the adult require first aid, complete an accident form indicating any marks and bruising

If they have a carer have they been notified

If Yes provide details of what was said

Have the correct authority been notified based on the response level required

Who did you call?

1 Contact Person

Email

2 Contact Person

Email

Adults current location and emotional and physical condition

Is the adult safe or in need of immediate protection

Known current or previous involvement of other agencies/professionals

Adults account of the incident

Details of any other witnesses

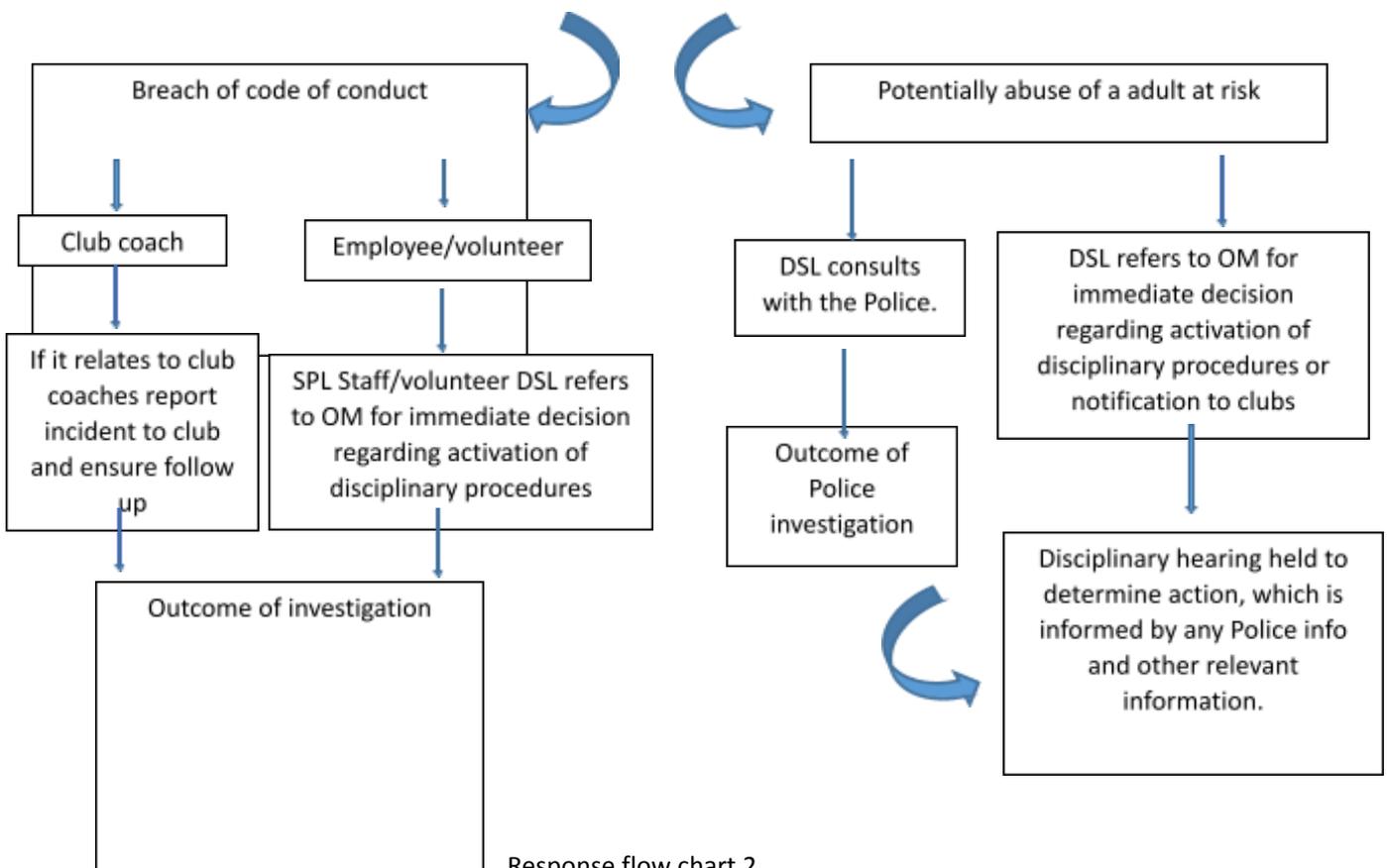
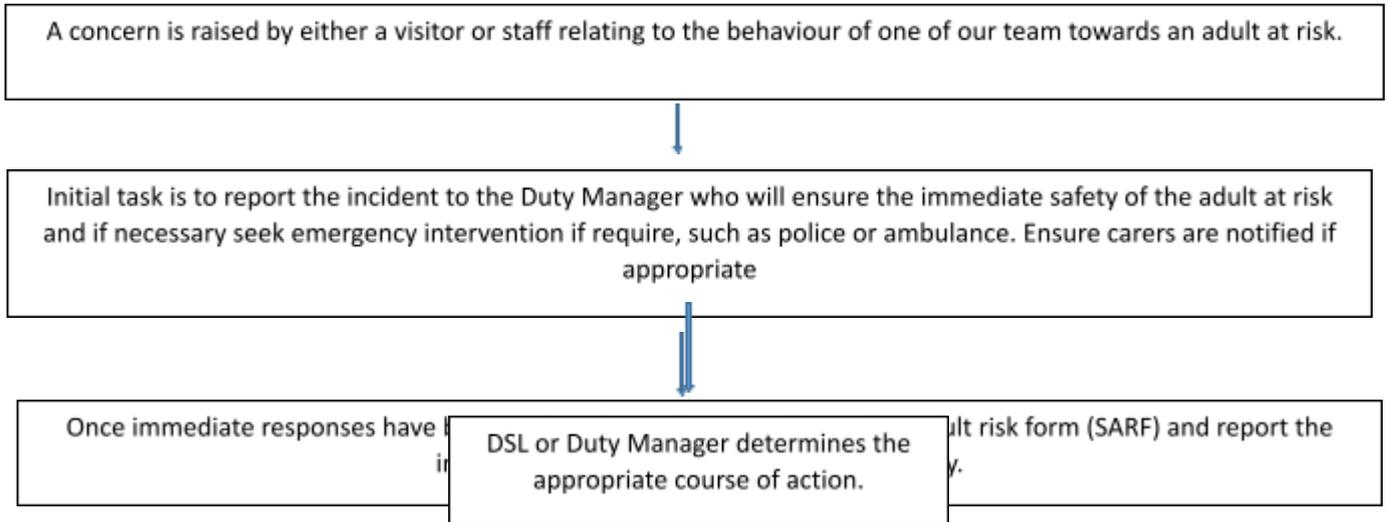


- Online training course <https://www.hsqe.co.uk/course/designated-safeguarding-lead-adults/>

## Appendix 3 Response Charts

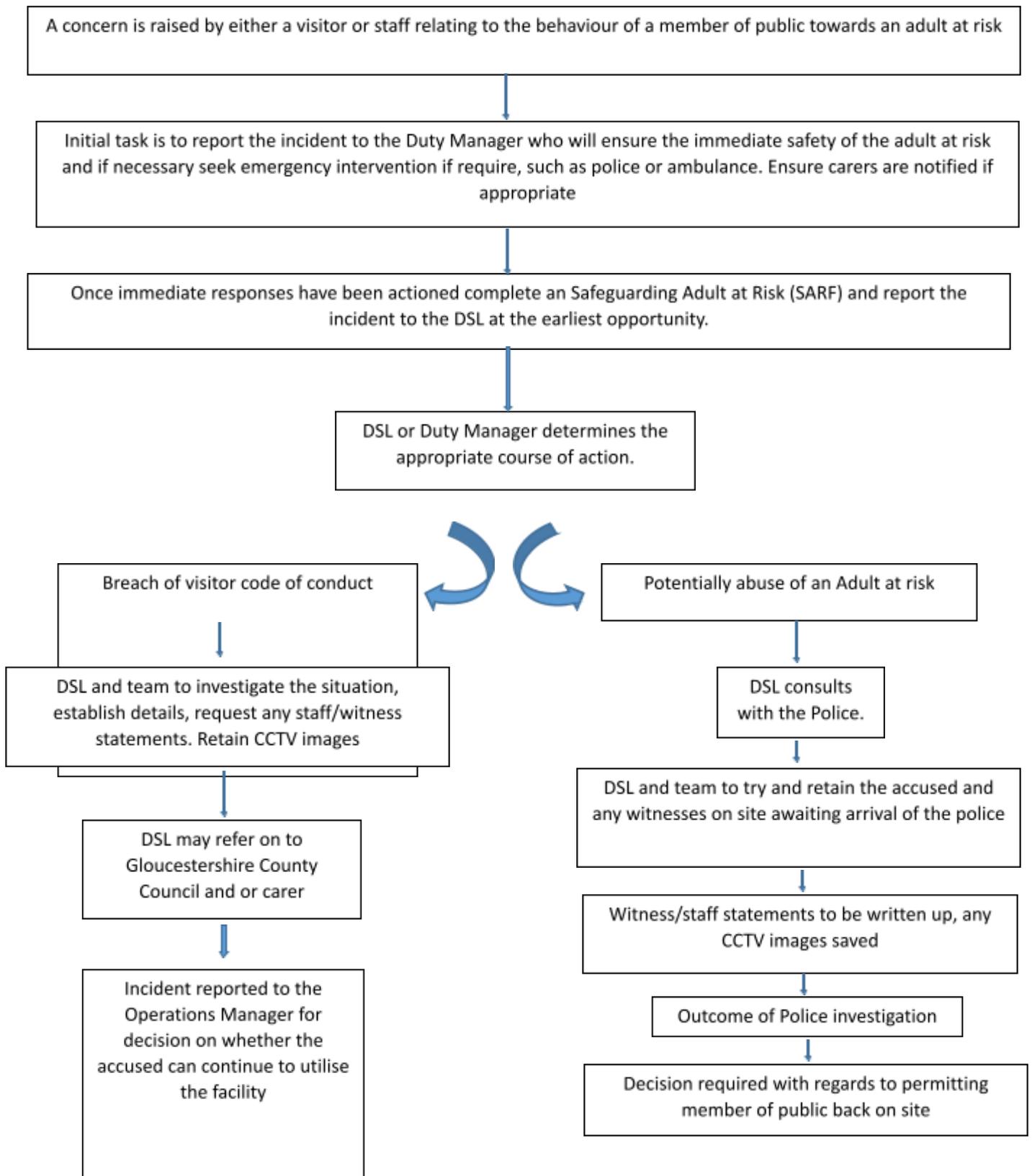
Response flow chart 1

### Safeguarding Adults at Risk Response Chart 1 – Concerns regarding staff, volunteer/coach



Response flow chart 2

## Safeguarding Adults at Risk Response Chart 2 – Concerns regarding a visitor



## Appendix 4 Code of Conduct

### Staff and Volunteers

It is very important that staff and volunteers maintain a high level of professionalism at all times during any type of interaction with members of the public, especially with children or vulnerable adults to ensure your actions/interest cannot be misinterpreted in anyway. The following codes of conduct apply to all employees and volunteers working on behalf of SPL.

#### Professional Standards

We pride ourselves on our employees, and our safe recruitment processes, we also invest heavily in training our staff throughout the season. It is very important for our professional integrity that all employees and volunteers maintain high professional standards and behaviour. As part of induction training these standards are fully explained and includes the wearing of appropriate uniform to provide a smart appearance, that is easily identifiable at all times, and the manner in which staff communicate with our visitors and conduct their duties. Posters are on display in the entrance area of the Lido and highlight the different roles of staff and relevant/identifying uniform. Staff are reminded that if they wear uniform to travel to work, or participate in Lido activity prior to or following a shift, they will be perceived by members of the public as being representatives of the Lido, even though they may not be on duty, therefore the same professional standards will apply.

#### Social Contact including social media

SPL is considered a very friendly sociable place and we encourage staff to converse with visitors to provide a warm welcome, but it's important that you don't become over familiar especially with children and vulnerable adults. To ensure professional boundaries are maintained:

- Do not ask children or vulnerable adults to undertake personal jobs or errands.
- Do not share any personal information with a child or vulnerable adult, do not invite a child into your home or any home or domestic setting frequented by yourself.
- Do not request or respond to any personal information from a child or vulnerable adult other than that required as part of your professional role.
- Be vigilant in maintaining your own privacy and be mindful of placing yourself in vulnerable situations.
- Ensure all communications takes place within clear and explicit professional boundaries. This includes the use of technology such as mobile phones, text messaging, emails, digital cameras, videos, webcams, CCTV, websites and blogs.

#### Infatuations

- Deal with infatuations sensitively and appropriately to maintain the dignity and safety of all concerned.
- Ensure your behaviour adheres to the staff and volunteers code of conduct
- If you become aware an infatuation is developing or any indications that it may, record it and discuss it with the Safeguarding Lead on duty so that action can be taken to avoid any hurt, distress or embarrassment.

#### Sexual Contact

- Do not have any form of communication which could be interpreted as sexually suggestive or provocative or make sexual remarks to, or about a child or vulnerable adult either verbally, written or electronically.
- Do not discuss your own sexual relationship with or in the presence of children or vulnerable adult.
- Ensure your relationships take place within boundaries of respect and professionalism.
- Be aware that consistently conferring in appropriate special attention and favour upon a child or vulnerable adult might be construed as part of a grooming process, and as such will give rise to concerns about behaviour.
- Do not engage in sexual activity with or in the presence of a child, or cause or incite a child to engage in or watch sexual activity, to do so would be considered a criminal offence.

#### Physical Contact

- Only have physical contact with a child or vulnerable adult when it is necessary and in ways which are appropriate to your professional or agreed role and responsibilities, never touch a child or vulnerable adult in a way which may be considered indecent. Be aware that even well-intentioned physical contact may be misconstrued by the child, vulnerable adult, an observer or by anyone to whom this action is described.
- Be aware of the child or vulnerable adults reactions or feelings and, as far as possible, only use a level of contact which is acceptable to the person and for the minimum time necessary.
- Seek permission from the child, vulnerable adult or the parent/carer, if the child is very young, before physical contact is made and agree what contact is acceptable.
- Do not assume that when a child or vulnerable adult is distressed they seek physical comfort.
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.
- Where a child/vulnerable adult initiates inappropriate physical contact, you must sensitively deter them and help them understand the importance of personal boundaries.
- Always be prepared to report and explain actions and accept that all physical contact is open to scrutiny.

#### One to one situations

- Avoid taking a child/vulnerable adult to an office or area which would create a one to one situation. If you have to talk with them remain visual to others or ensure you have another staff member with you.
- If you find yourself in a one on one situation and the person becomes distressed or angry towards you always report it on an incident form.

#### Confidentiality

- Keep private and sensitive information confidential at all times and only share it to relevant people when it's in the interests of the child/vulnerable adult to do so.
- Never ask a child or vulnerable adult to keep secrets.

#### Gifts, rewards and favouritism

- Only give gifts to an individual child/vulnerable adult as part of an agreed reward system, such as part of SPL opening day or water safety day.
- When operating a reward system ensure the selection of awards are fair and transparent.

#### Behaviour Management

- Should someone's behaviour become an issue, try to defuse the situation before it escalates.

- Only use physical intervention in exceptional circumstances and as a last resort, when other behaviour management strategies have failed and where there is a risk of physical injury or serious damage to property or other visitors.
- any form of physical contact should achieve an outcome that is in the best interest of the child/vulnerable adult whose behaviour is of immediate concern. All forms of physical intervention should be proportionate to the behaviour of the young person and the nature of harm/damage they might cause i.e. the minimum force required to avert injury to a person or serious damage to property, applied for the shortest period of time.
- When using physical intervention use the minimum force necessary and always report and document the incident.
- Be mindful of other factors which may be impacting on a person's behaviour such as bullying.

### Employee Staff Relations

- As a seasonal facility we employ a large number of young people aged between 16 – 18yrs old. All staff must remember that these employees are children.
- Where a person aged 18 or over is in a position of trust with a child under 18 it is an offence for that person to engage in sexual activity with or in the presence of that child, or to incite that child to engage in or watch sexual activity. Staff aged over 18yrs should not have a sexual relationship with any employee aged between 16 yrs – 17yrs if they hold a position of authority over the younger employee.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Visitors

Visitors utilise the lido facilities for many different reasons whether it's to socialise, get fit and keep fit, spend time with family and friends. It attracts people of all age ranges and social demographics. Everyone's idea of how they enjoy SPL will be different, however we ask that all visitors respect each other and value people's differences.

### Entrance Policy and guidance relating to risks

All children under the age of eight should always be accompanied by a guardian aged 16 years or over, this person may be responsible for up to two children. Guardians must maintain constant supervision, particularly in the water and changing rooms. We advise that children under 5 years should be supervised in the water on a one-to-one basis. Parents have a specific responsibility for the safety of their own children, this cannot be abdicated to lifeguards. The role of the lifeguard is to maintain a safe and healthy environment for all swimmers.

This policy is based on industry guidance relating to safety of under 8s in swimming pools. It is important that parents are aware that children may face other risks that are not associated with swim safety. The vast majority of leisure facilities have had to respond to child welfare concerns, first aid and emergency incidents.

If a child requires first aid or emergency treatment and the child's parent/guardian(s) are on site, we will always try to obtain parental consent before administering treatment. If a child is

unaccompanied, we will administer the required treatment and take all reasonable steps to try to gain parental contact details, in order to inform parents/guardians where there have been significant injuries or if the child appears distressed. Should an unaccompanied child require further hospital treatment, we will notify the emergency services that we have an unaccompanied child requiring urgent medical assistance. All incidents are recorded in accordance with the Pool Safety Operating Procedures and will be available should a parent/guardian wish to view.

If a child becomes unwell or is injured during a club or school activity taking place at Sandford Parks Lido, we will administer treatment as required. The organisation must maintain emergency contact information, medical information and confirmation of parental consent.

If you have any concerns relating to a child or the behaviour of an adult towards a child inform a member of our staff immediately.

#### Photography and videos

We understand that visitors may wish to record special moments when visiting with their friends and family. It is important that everyone understands the principle of privacy and should only record images that directly relate to their group.

If a member of public wishes to take images of the site that may include general public they should ask permission from the manager on duty before taking any images.

Cameras, mobile phones, video cameras, underwater cameras or mobile technology are not permitted for use in the changing rooms, toilets or in any of the swimming pools.

Sandford Parks Lido accept that this is difficult to control in the changing areas and toilets and we ask our visitors to be vigilant and report any concerns to a member of our staff.

#### Reporting any behavioural concerns

If a member of public has a concern regarding the welfare of a child, or the behaviour of an adult towards a child they should report this to a member of the SPL team. Staff are clearly visible by their uniform or can be contacted via Reception.

#### Site rules and regulations.

All visitors must follow our site rules and regulations as detailed on our website [www.sandfordparkslido.org.uk](http://www.sandfordparkslido.org.uk)

## Appendix 5 Whistle Blowing Policy

This policy applies to everyone who works for Sandford Parks Lido, whether on a paid or voluntary basis.

### **Aims and purpose of this procedure**

The aim of this procedure is to provide a clear and transparent way for anyone who works for SPL to raise genuine concerns about acts of wrongdoing or malpractice in the workplace. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

This procedure provides managers with steps to deal with allegations, ensuring that staff and volunteers are not penalised for raising genuine concerns, even if those concerns prove to be unfounded. It also provides the means for taking disciplinary action against anyone who is found to have raised false concerns with malicious intent.

### **What to do if you wish to raise a concern about malpractice**

Speak to your supervisor, manager, or another colleague (preferably someone you work with closely). If your concern relates to your supervisor/manager, you should speak to that person's manager. If

you choose to speak to a colleague, he/she may nominate another responsible manager to handle your concern.

Your manager, or the responsible manager, will arrange to meet with you as soon as possible to discuss your concern. This meeting can take place away from the workplace if necessary.

You will be told at the meeting, or as soon as possible afterwards, what action will be taken to address your concern. It may not be possible to tell you the full details of the outcome, as this could relate to confidential third-party information. If no action is to be taken in relation to your concern, you will also be informed of this fact and given the reasons why.

If you do not want the person you have concerns about to know your identity, you should make this clear to the responsible manager at the earliest opportunity. Every effort will be made to respect your wishes, but it cannot be guaranteed that your identity will not be disclosed. If this is the case, you will be informed and any issues you may have about this will be discussed with you.

If you need support in raising your concern, you may bring a work colleague or trades union representative with you to the meeting with the responsible manager.

### **What to do if someone raises a concern with you about malpractice**

If someone tells you they are concerned about the actions of another staff member or volunteer, you should arrange to meet him/her as soon as possible. If you are not the person's supervisor/manager, you should establish why he/she has chosen to discuss the concern with you. You may suggest that the person speaks to another responsible manager if you wish, but should not refuse to hear what the person has to say.

You should approach the situation sensitively, recognising the discomfort that the person may feel. Offer to meet him/her away from the office if he/she wishes, and allow him/her to bring a work colleague or trades union representative to the meeting. You should also remind the person with the concern about other sources of support available to him/her. Some are listed at the end of this document.

If the person reporting the concern wants his/her identity to be kept confidential, you should explain that this will be done if possible, but that it may not be achievable.

Make notes of your discussions with the individual, and check the accuracy of your notes with him/her.

### **Deciding what action to take**

Once you have established the nature of the concern, it may be of a relatively minor nature and you may decide to resolve it informally. If the concern appears more serious, you must consider first whether any immediate action is needed.

If the concern is a child or vulnerable adult safeguarding issue you must first ensure their safety and then follow the procedures in appendix 3.

Any other concern will be dealt with in the following manner:

### **Conducting an investigation**

Unless the matter is relatively minor and can be dealt with informally, the responsible manager should arrange for an investigation to be completed as swiftly as possible. The investigation should also be demonstrably thorough and impartial.

The scope of the investigation will be determined by the nature of the concern. Witnesses may need to be interviewed and records may need to be scrutinised. It is also possible that advice may be needed from someone with specialist knowledge in human resources.

Once the investigation is completed, a report should be produced summarising the nature of the concern, the investigation process and the outcome, including specific recommendations. Take measures to preserve the anonymity of the person who raised the concern, if this has been his/her wish. If the concerns are not upheld, this should also be made clear.

If the concern is upheld and the person at the centre of it is found to have been culpable or remiss in some way, the report's recommendations should be carried out using a clear plan of action. The plan may include the use of disciplinary action, training, coaching, counselling, the implementation of new policies or procedures for the whole workforce, or a referral to the Independent Safeguarding Authority.

If it becomes apparent during the course of the investigation that a criminal offence may have been committed, the police should be informed. Your own investigation may have to be suspended on police advice, if they decide that they need to become involved.

The person who raised the concern should be informed of the outcome, but not the details of any disciplinary action. It may be appropriate for the person who raised the concern to be offered support or counselling.

If the concern is unfounded and the person who raised it is found, through the process of investigation, to have acted maliciously or out of a desire for personal gain, it may be appropriate to consider disciplinary action against him/her.

### **Recording the concerns**

The responsible manager should make accurate notes of each stage of the process, including the discussions during meetings, regardless of whether the concern is dealt with formally or informally. Copies of these notes should be given to the person who is the subject of the concern. The person who raised the concern should also be given copies of notes from his/her discussion.

Notes made during the investigation and the report of the investigation, together with any notes relating to the outcome, should be kept on the file of the person at the centre of the concern. If it was requested, these notes should not reveal the identity of the person who reported the concerns.

This procedure has been adapted from the NSPCC *Speak Out* policy and procedure.

## **Appendix 6 Contacts**

### **SPL Designated Safeguarding Officers:**

Fabia Garau : [fabia@sandfordparkslido.org.uk](mailto:fabia@sandfordparkslido.org.uk)

Peirs Cardon: [piers@sandfordparkslido.org.uk](mailto:piers@sandfordparkslido.org.uk)

Below is a list of emergency/ advice and support contacts to assist with a variety of adult safeguarding issues.

#### Gloucestershire County Council

If you are at risk or suspect someone is at risk and want to talk to someone please phone our Adults Help desk on 01452 426868. The helpdesk is operational 8.00am – 5.00pm Monday – Friday

Alternatively, there is an out of hours Emergency Duty Team on 01452 614194

Or email the team on [social.enq@gloucestershire.gov.uk](mailto:social.enq@gloucestershire.gov.uk)

Information that would be helpful

- Why you're concerned
- The name, age and address of the adult at risk
- If anyone lives with them
- If they're getting help from any organisation
- Who may be doing the abuse

#### Police

If you think someone is breaking the law phone the police on 101 or in an emergency always dial 999.

Don't delay in reporting abuse if you're not sure about some of these details.

Additional contact numbers that may provide additional support

Victim Support : **01452 317444**

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

NHS **111**

Gloucestershire Rape & Sexual Abuse Centre : **01452 526770**

Gloucestershire Domestic Abuse Support Service : **0845 602 9035**

Ann Craft Trust

ACT is a national organisation working with staff in the statutory, independent and voluntary sectors in the interests of people with learning disabilities who may be at risk from abuse.

Tel: 0115 9515400

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

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

This policy statement came into force on 5<sup>th</sup> March 2020

We are committed to reviewing our policy and good practice annually.

Signed:

[Trustee lead for safeguarding and child protection)

Date:

