

Safeguarding Policy



Coach Core Foundation statement:

There is no place for discrimination, hate or inequality. Our charity works hard to break down barriers and provide safe, positive experiences and opportunities both short and long term. We also value highly the wellbeing and safety of our own staff, volunteers and supporters and as a result, we take a zero-tolerance approach to any acts or behaviours that may invoke negativity or harm of any kind.

This policy lays out our commitment to this statement and how we proactively seek to ensure all parties feel protected and able to report concerns without fear of reprimand.

We are committed to formally reviewing our risk and safeguarding policies annually, and as a team, reviewing our processes quarterly, to discuss any ongoing concerns and implement any updates in line with any changes to internal or charitable safeguarding governance.

If any individual, either internally, externally (or both), needs to report an incident or concern of any kind, we positively welcome this via our [INCIDENT REPORT FORM](#).

Document Summary

To provide managers, staff and partner organisations with a framework when identifying and managing safeguarding issues.

Date of policy	February 2020
Accountable person	<ul style="list-style-type: none">• Chief Executive Officer, Coach Core Foundation• The charity Chairman and Independent Safeguarding Trustee can also be contacted on safeguarding matters. You can find live contact information on these individuals HERE
Last update	February 2026 Amendment chart – page 12

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I. INTRODUCTION

I.2 Charity overview

Coach Core is an entry level apprenticeship programme that uses sport and physical activity as the hook to improve the employability and life chances of young people around the UK.

Since 2012, we have targeted young people who are not in employment/education and who live in and around some of the UK's most challenging communities.

Our model is to work in partnership locally and nationally to provide the best possible places of employment, education and support to each individual apprentice.

We then focus on developing every learner through mentoring and personal support as well as providing unparalleled education and professional development, all with the goal of full-time education/employment exit routes that are right for them.

We have **four key audiences** for whom we have a duty of care and must provide ongoing, strict safeguarding and risk review processes:



I.2 Our four key audiences' definitions

We define our four key groups as follows:

<p>1) Our apprentices</p> <ul style="list-style-type: none"> - Apprentices selected for the programme. - Previous apprentices ('graduates') of Coach Core <p>At times, we may also have a duty of care over potential Coach Core applicants, for example, those that we meet at recruitment events or careers fairs.</p>	<p>2) Our employers and their communities</p> <ul style="list-style-type: none"> - The individual organisations that form our consortiums - The mentors and lead staff within those organisations - The participants that will benefit from the coaching practice of our apprentices
<p>3) The Coach Core team, our trustees, and other key individuals/groups.</p> <ul style="list-style-type: none"> - Those employed by Coach Core Foundation and those in non-executive roles / volunteer roles. - Consultants and third-party professionals we engage 	<p>4) Wider partners, supporters, general public</p> <ul style="list-style-type: none"> - Our education partners. - Our funders and donors - The sector partners and supporters we work with a varying level. - Our ambassadors and key individuals who promote our activities. - Members of the general public

1.3 Purpose of the policy

Ensuring the safety and protection of their beneficiaries is an essential aspect of all charities work. Unless individuals are safe and treated well, with dignity and respect, it is impossible for them to realise their potential or to benefit fully from the work and activities supported by Coach Core Foundation (CCF).

There has been increasing recognition of the way in which vulnerable people can be at risk of harm from organisations and institutions that are supposed to help them, either as a result of abuse and exploitation by individuals in positions of trust, or via programme activities in general.

As a consequence, there has been a significant increase in the efforts made by agencies to ensure that no harm comes to beneficiaries, or target communities, from contact with their staff and associates or as a result of any of the organisation's activities.

Given these values, and in light of widely recognised risks, CCF has developed this policy to promote protection for all those people it comes into contact with – staff and volunteers within the charity itself as well as the partner organisations and beneficiaries with which we work.

All children and adults have a right to protection, and their welfare is paramount. CCF is committed to doing all it can to protect our apprentices from all forms of harm that might occur including abuse, neglect and exploitation and to ensure appropriate action is taken if such harm occurs. As a convening organisation, CCF also recognises our responsibility to influence our network to take their safeguarding responsibilities seriously. This includes our employer partners, training providers, contractors and any other external partners we may work with.

1.4 Scope

Based on best practice, this policy and associated training is mandatory and applies to all staff, including temporary, agency, freelance and contractors (hereafter referred to as 'staff'), trustees and volunteers.

This policy provides information about abuse, advice on identifying problems as well as defining individual and collective roles and responsibilities in safeguarding children and adults from abuse.

This policy is also mandatory and applies to other organisations with whom CCF works or provides with funding. CCF expects that the principles and approaches already shared with partnership organisations mean that they will fully support the values and commitments set out in this policy. CCF also expects that partner employers will have protection policies and associated measures in place. Where this is the case, they should have no difficulty in also complying with the standards set out in this policy.

1.5 Context

CCF is committed to, and endeavours to, meet its obligations towards the safeguarding of children and adults.

Whilst CCF does not currently undertake any regulated activity as defined by the Safeguarding Vulnerable Groups Act 2006, it does interact with such, and therefore an outcome of this policy and its associated training is to provide staff, trustees and volunteers with the overarching principles that guide our approach and interactions.

2. DEFINITIONS

- 2.1 Safeguarding** – embedding practices throughout the organisation and/or wider network, to make sure that children and adults are protected wherever possible. Essentially, the term ‘safeguarding’ refers to the actions that we put in place to prevent harm.
- 2.2 Child protection** – an activity which is carried out to protect specific children who are suffering, or are at risk of suffering, significant harm. Essentially, this refers to how we respond if we believe a child is at risk of harm or has been harmed.
- 2.3 Child/ child at risk** – A child is an individual up to and including age of 18 (as defined in the Children Act 1989). Consent for referral of safeguarding concerns is not required for children up to the age of 18, if there is concern that a child may be at risk of abuse, neglect, or significant harm. A child at risk is one who experiences/is at risk of abuse/neglect/other kinds of harm (this may incorporate some of the scenarios highlighted in table 2.5).
- 2.4 Adult** – In the UK, the legal definition of an adult is established at the age of 18. Consent for referral of safeguarding concerns for those aged 18+ should be sought where appropriate, unless there is a risk of serious harm or risk to others in doing so. Where safe to do so, adults should be informed about the need to share information. They should also be notified if information was shared without consent, unless doing so increases risk. Information sharing should be limited to what is necessary and proportionate, protecting the adult’s rights and dignity.
- 2.5 An adult at risk** – An adult at risk is a person aged 18 years or over who is experiencing or is at risk of abuse, neglect or other kinds of harm and has care and support needs. (Care Act 2014). This may include a person who:

Is elderly and frail	Has a mental illness including dementia
Has a physical or sensory disability	Has a learning disability
Has a severe physical illness	Is a substance misuser
Is homeless, or at risk of homelessness	Enduring significant poverty

Although Coach Core Foundation often refers to our apprentices as young adults in everyday practice, for the purposes of this policy—and to ensure clarity, consistency and alignment with safeguarding legislation—we will use the simplified terms ‘child’ (0–17 years) and ‘adult’ (18+ years) as inclusive categories. These terms will encompass apprentices and graduates who may be at risk of abuse, neglect or harm, ensuring clear safeguarding language while still allowing us to respond appropriately to their specific needs and risks faced by each individual.

2.6 Duty of Care – a legal obligation to:

- Always act in the best interest of individuals and others.
- Not act or fail to act in a way that results in harm.
- Act within your competence and not take on anything you do not believe you can safely do.

2.7 Abuse – a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take many forms, including:

Physical abuse	Discriminatory abuse	Organisational abuse
Domestic violence and abuse	Psychological/Emotional abuse	Neglect and acts of omission

Financial or material abuse	Self-neglect	Modern slavery
Online and digital abuse	Sexual Abuse	Harassment

2.8 Breach of Trust - An act or omission by someone in a position of trust that undermines the safeguarding of an adult at risk. A breach of trust may include, but is not limited to the categories of abuse highlighted above, but may also include:

Neglect of duty: Failing to act when there is a duty to protect the welfare of an adult at risk, resulting in harm or increased vulnerability.

Violation of professional boundaries: Inappropriate relationships, exploitation, or personal gain from the trust placed in a professional or volunteer by an adult at risk.

Coercion or undue influence: Using one's position to force or unduly influence an adult at risk to act in a way that is harmful to them.

For this purposes of this policy, a breach of trust could refer to all staff, including temporary, agency, freelance and contractors, trustees and volunteers

2.9 Significant harm – There are no absolute criteria on which to rely when judging what constitutes significant harm. For the purposes of CCF's response to concerns about children or adults, this distinction is the responsibility of children's or adult's services and the police. Any decision about investigating concerns of this nature will therefore be their responsibility but CCF has a key role in contributing to any investigation.

2.10 Disclosure and Barring Service (DBS) – The DBS was created when the Criminal Records Bureau (CRB) merged with the Independent Safeguarding Authority (ISA) in December 2012. The DBS runs checks at three different levels providing information on an individual's criminal record(s). Those engaged in regulated activity must have a valid DBS check at the required level for the role they are performing.

3. KEY PRINCIPLES

- This policy and corresponding procedure aim to achieve a culture within CCF in which a proactive approach to safeguarding, promoting and protecting the rights of children and adults is taken.
- CCF will ensure that partner organisations conducting work with children and adults conduct all relevant checks and vetting procedures throughout their recruitment and onboarding processes.
- CCF also ensure that they work with Training Providers who demonstrate robust safeguarding policies and procedures and are committed to continual improvement in this area.
- All adults and children who either work, volunteer or use CCF services have the right to live a life free from abuse, harm and neglect regardless of age, disability, gender, sex, racial heritage, religious belief, sexual orientation, marriage or civil partnership or pregnancy/maternity.
- This policy and associated procedure apply to all staff, volunteers, Trustees, visiting Donors and representatives of CCF, including contractors and temporary staff.
- CCF is committed to the prevention of, and protection from, abuse and neglect of all adults and children and those at risk of abuse or neglect who come into contact with the organisation through its staff or representatives, in whatever capacity that contact occurs. We have a series of policies that underpin this commitment (Section 7) as well as frequent updating of training, legislation and policy

review at all times. We also will act, as outlined in this policy, on all reports of safeguarding concerns ensuring such referrals and subsequent actions are documented accordingly.

- CCF is committed to taking all necessary steps to stop abuse happening, whether that abuse is perpetrated by staff, volunteers, Trustees, visiting Donors and representatives of Coach Core Foundation, including contractors and temporary staff or members of the public.
- CCF has a duty of care to all adults and children it has contact with. As a result, CCF will take a proactive stance to building a culture of good safeguarding practice across our network, to promote and prioritise the rights of children and adults across our programmes (as per the four key audiences' previously highlighted). Any concerns about the welfare of a child or adult will be documented and actioned as per this policy.
- If there are concerns about staff or volunteers perpetrating abuse, it will facilitate any action required to address this without delay. All allegations, concerns, or suspicions of abuse or neglect are taken seriously and responded to in line with this policy.
- This policy includes actions required to address abusive behaviours and attitudes. CCF's staff, volunteers, Trustees, visiting Donors and representatives of CCF, including contractors and temporary staff are entitled to be treated with respect and to work in a safe environment.
- On occasions when staff have been dismissed because of concerns about safeguarding, they may be referred by CCF to relevant professional bodies including, where appropriate, the Disclosure & Barring Service (DBS).
- CCF is committed to ensuring that the right staffing and reporting structure is in place to enable safeguarding concerns to be dealt with effectively and to ensure the correct processes are followed as detailed in the procedure. This includes the escalation to senior staff within CCF of concerns posing a significant risk to an individual or the charity.

4. ROLES AND RESPONSIBILITIES TO SUPPORT SAFEGUARDING

All staff and volunteers are provided with a clear view of professional boundaries and an expected level of conduct, via the CCF Code of Conduct, which is provided during staff induction. In addition, CCF ensure staff and volunteers are carefully recruited and necessary checks are made in line with recruitment and vetting good practice guidelines. As part of this process, CCF ensure the following:

ALL TRAINING AND CHECKS ARE RENEWED EVERY 3 YEARS MINIMUM.				
<i>Programmes facing = frequent, physical presence with apprentices in the field.</i>	DBS check	Safeguarding	Mental health awareness	Emergency Aid
CCF contracted staff –programmes facing	Enhanced	Yes - Minimum Level 1	Yes - mandatory	Yes – Emergency Aid at Work
CCF contracted staff – non programmes	Basic	Optional but offered training	Yes - mandatory	Optional but offered training
CCF trustees <i>(See 4.1.5 for exception)</i>	Basic	Optional but offered training	Optional but offered training	Not required
Volunteers	SMT to consult DSLs to determine if the volunteer has a) direct physical contact with apprentices (Prog. facing) and/or b) access to apprentice data without supervision.			
<i>If deemed, they DO meet one or both of the criteria:</i>	Basic OR Enhanced (Prog facing only)	Optional OR Min. Level 1 (Prog facing only)	Not required	Not required
<i>If deemed, they DO NOT meet one or both of the criteria:</i>	Not required	Not required	Not required	Not required

Contractors	Basic	Optional OR Min. Level I (Prog facing only)	Optional but offered training	Not required
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There will also be **two** qualified Designated Safeguarding Leads at any one time within the charity with these individuals made known publicly. Refresher training will be carried out at least every 3 years.

4.1 Key Roles

All staff within the organisation have a responsibility for safeguarding children and adults. However, the individuals below have enhanced roles and responsibilities:

4.1.2 Chief Executive – Overall responsibility for all safeguarding matters within the charity.

- **Designated Safeguarding Leads (DSL)** – CCF commits to have two Designated Safeguarding Leads across the organisation. This individual (s) is responsible for keeping abreast of all relevant safeguarding and protection matters, updating policies and practice accordingly and disseminating relevant updates to the broader CCF staff team.

One of the DSLs- namely- the Workforce, Skills and Apprenticeship Manager, will be specifically responsible for:

- Logging all safeguarding incidents and concerns, once reported by the Workforce, Skills and Apprenticeship Lead team or via other parties (for example, from Learning Coaches or via the safeguarding@ inbox).
- Conducting regular reviews of safeguarding incidents and concerns, ensuring they are brought to a swift conclusion as soon as is reasonably possible
- Conducting quarterly meetings with Programmes Facing staff, to ensure safeguarding good practice is regularly embedded
- Escalating persistent or serious concerns to the Chief Executive Officer, or designated Safeguarding Trustee, where required. These individuals may make referrals to external bodies such as the local authority or the police.

4.1.3 Programmes Facing Staff – namely our Workforce, Skills and Apprenticeship Leads, are responsible for:

- Undertaking and maintaining mandatory training linked to safeguarding and child protection.
- Ensuring they are aware of how to report safeguarding concerns and to whom.
- Reporting and/or escalating concerns to the DSLs, as per this policy, where required.
- Familiarising with the CCF's Whistleblowing policy
- Conducting themselves in a manner which safeguards and promotes our practices at CCF.
- Ensuring all other staff are provided with guidance about safeguarding concerns as required.
- Familiarising with the policies and procedures we employ to vet and protect our beneficiaries, partners and employer teams connected with every Coach Core programme.

4.1.5 Designated Trustee – an experienced, qualified, and informed individual in this field who has been chosen to be the point of contact for all safeguarding matters and whistleblowing allegations (as and when needed). A live list of these individuals can be found [HERE](#)

5 PERCEIVED RISKS

Should this policy be ignored or disregarded, the possible outcomes are:

- Further risk of harm/neglect for children and adults, particularly those already at risk.

- Possible inquiry, internal or external investigation of CCF staff, for failing to take appropriate steps. This may also lead to a disciplinary process.
- Possible inquiry and report from the Charity Commission and regulators or recommendation from local authorities to regulators, for DSL's, the Chief Executive and Board of Trustees.
- Possible risk of public scrutiny and ultimately risk of prosecution for CCF.

6 PROCEDURES

6.1 Recruitment

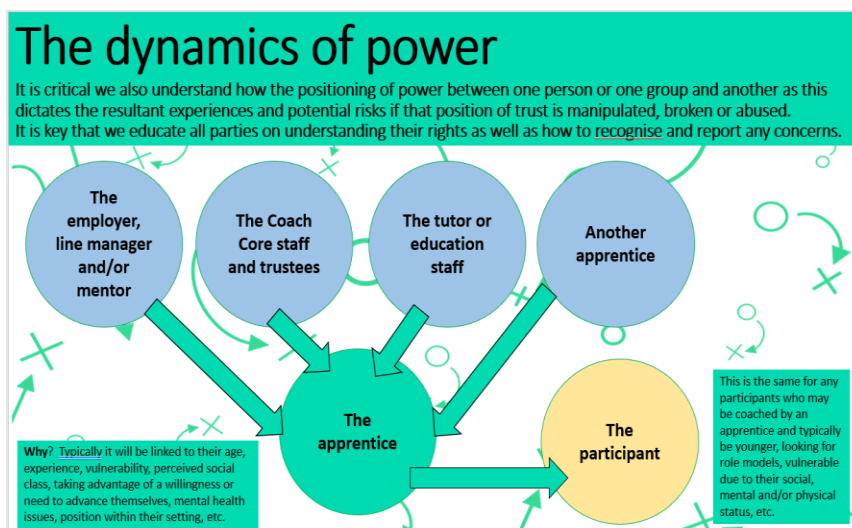
CCF performs a basic DBS check on all its contracted staff, which is refreshed every 3 years. Trustees are also asked to undergo basic DBS checks before appointment. Staff in Programme Facing roles, such as our Employment Coaches, undertake an Enhanced DBS check, due to the nature of their role. Full CCF position on DBS can be found in the table in Section 4.

6.2 Training

All Programmes Facing staff will attend mandatory safeguarding training and will be made aware of their responsibility to comply with current (and new) legislation and guidance, as it is implemented. Designated Safeguarding Leads will undergo additional training befitting this position and are expected to keep up to date and informed about any changes in this area. Training will be refreshed every 3 years – or earlier where legislation or practices changes. Information regarding this training will be logged within the HR Department.

Full CCF position on staff training can be found in the table in Section 4.

6.3 The Dynamics of Power



By understanding how these dynamics impact chiefly the apprentice at the heart of every programme, we are then able to understand and attempt to mitigate any safeguarding risks and concerns we may have for them individually and/or for those around them. Anything that presenting risk or challenge to their wellbeing and/or forward progress is something CCF commits to reviewing and actioning regularly.

6.4 Process for Managing Safeguarding Disclosures

CCF staff do not coach or work with children on a day-to-day basis. However, visitations to programmes are frequent and disclosure to a staff member, via email, telephone call or during a programme visit could take place at any time. Additionally, concerns or disclosures regarding children (and adults) may reach CCF from various means, given our role as a convening organisation.

The examples provided here aim to highlight how (and to whom) a safeguarding disclosure or concern may be reported within the Coach Core network, together with the expected next steps for each scenario.

It is worth noting that this is not an exhaustive list or process as every safeguarding incident will have unique circumstances. However, these examples aim to encompass the most likely scenarios, to ensure clarity on who may need to be informed of safeguarding concerns and any specific responsibilities as a result.

Disclosure or concern raised by:

6.3.1 External individual / member of the public

Members of the public that have a concern about a Coach Core apprentice are encouraged to use the **INCIDENT REPORT FORM** to submit their concerns or complaints. However, if easier and more practical, the safeguarding team will of course process any emails, telephone calls and/or social media posts linked to safeguarding in the same manner. This communication will be passed to the DSL/s for further action and response accordingly (see 6.5.3 for more information on this).

If there is an immediate threat to the safety or welfare of an individual, the referrer should contact the Police in the first instance.

6.5.2 Internal staff and volunteers

We understand that it can be a very sensitive matter when reporting internal concerns or complaints and have adopted the following processes:

a) Disclosure/concern made to CCF staff, regarding an apprentice:

Coach Core staff are asked to complete the internal Safeguarding Log, with as much detail as possible about the incident/allegation. They are also asked to submit their report to the DSL as soon as possible.

If there is an immediate threat to the safety or welfare of the individual, the referrer should contact the Police. If there is a serious concern or allegation made about or received from a child or adult (including those deemed to be at risk), the DSL will escalate it to the Chief Executive.

As per the principles of the Mental Capacity Act (2005), an adult will be assumed to have capacity (and therefore able to confirm whether they provide consent), unless it is determined, by a professional, that they do not lack capacity. Any decisions made on behalf of an individual who is deemed to lack capacity will be made in their best interests. Further information about the Mental Capacity Act can be found here: [Mental Capacity Act 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2005/9).

If consent has been given by the individual, the employer, Training Provider and where required, social services, should be made aware to ensure all parties can support where required. If consent hasn't been provided, or if it is unclear, the individual should use their personal judgement to determine whether information needs to be shared (and with whom). All decisions will be made with the interests of the individual in mind at all times.

b) Disclosure/concern made by CCF staff, regarding a member of CCF staff:

If a member of CCF staff has a concern about the conduct of another member of CCF staff, they should consult the internal whistleblowing policy for further guidance on next steps.

If the complaint is regarding one (or more) of the DSL's; the complaint should be passed to the CEO (if not a DSL) or the Designated Safeguarding Trustee

If individuals are not comfortable with this outcome, they can also contact the charity Chairman.

If there is a concern about the behaviour or conduct of CCF staff, it may be appropriate to make a referral to the Local Authority Designated Officer. It is the role of the LADO to respond to allegations made about those who work with children. Given CCF don't work directly with children and adults (in the context of our programme), this may not be appropriate, but further guidance on this should be sought using the processes highlighted above.

Copies of our safeguarding and whistleblowing policy are made available and highlighted when joining the Coach Core team/programme to help support this process.

6.5.3 Employers/Partners and Training Provider (s)

a) Emotional or social need identified by Training Provider/Learning Coach

Due to the nature of their role (and the direct relationship they have with apprentices) Learning Coaches may be made aware of additional emotional, social or support needs for their learners. These may include (but are not limited to): mental ill health, caring responsibilities, cultural adjustments, relationship challenges, geographic isolation or changeable living conditions. These needs may not be immediately obvious (or disclosed) at the start of the programme and may only emerge as they build trust and rapport with their Learning Coach. Equally, these needs may not require a safeguarding disclosure in themselves, but may need monitoring to prevent further escalation. Learning Coaches will work closely with Coach Core Employment Coaches (and employers), to identify any 121 needs for apprentices and ensure they receive the appropriate level of support.

At all times, the unique circumstances, preferences, and interests of apprentices will be prioritised, when determining any further support required. This will involve:

- Listening to the needs and desired outcomes of the apprentice
- Building trust and rapport with the apprentice
- Providing information and support in an accessible format, to allow them to make informed choices
- Requesting consent from the apprentice to access support/guidance via others (e.g. Employment Coaches, employers) where required
- Adapting support to meet the specific needs of the apprentice. This may involve scheduling additional 121 meetings, adapting their education schedule or working with employers to make adjustments to their working pattern.

b) Disclosure/concern made by Employers, Partners or Training Providers, regarding an apprentice:

If there is an immediate threat or danger to the young person, individuals should contact the Police. They should then follow their own internal safeguarding policies and procedures and also inform other parties within the Coach Core network, to ensure further support can be provided, where required.

6.5.4 Apprentices

- a) *Disclosure/concern made by an apprentice about themselves or another apprentice.*

If an apprentice has a concern about their own welfare or that of a fellow apprentice, they should report it initially to the Designated Safeguarding Lead at their employer or to their Learning Coach, if they are comfortable to do so. If this is not a feasible option, they should report their concern via email, verbally to a CCF staff member, or by using the Incident Report form.

If they have a concern about the behaviour of an adult who works with children, they should refer to their Designated Safeguarding Lead at their employer, or directly to the Local Authority Designated Officer (LADO).

6.5.5 The process we adopt.

All staff understand they must report/log any concerns or incidents linked to safeguarding within 24 hours. Coach Core Foundation staff are made aware of the 'Single Assessment Process', highlighted within the Governments '[Working Together](#)' 2018 paper, as part of their broader understanding of safeguarding and protecting children and vulnerable adults.

The single assessment process incorporates 4 levels of response that sit on a continuum:

- a) *Low level – Early Help Assessment:* where needs are relatively minor and individual or universal services can take swift action.
- b) *Emerging needs:* where a range of services to respond to the issue/their needs is required.
- c) *Complex/serious needs:* the child can be at risk of serious harm if not addressed. This is likely to require a co-ordinated, multi service intervention.
- d) *Child Protection concern:* immediate risk and need of and referred to social services without delay.

All staff are trained to recognise the key indicators however, they are generally encouraged to report all low-level concerns, to ensure we can escalate further if required and potentially prevent further harm.

If in any doubt, they are advised to liaise with the Designated Safeguarding Leads and, if required, refer to the local safeguarding child protection 'threshold guidance' and/or the multi-agency safeguarding hub for further support.

All staff are expected to record safeguarding concerns and incidents via the CCF Safeguarding Incident Report Log. This document requires staff to record detailed information about all safeguarding concerns, including a full description of the incident/concern/disclosure, who it relates to, who it was raised by details of any initial steps taken and further information about any onward actions. CCF Designated Safeguarding Leads review this Log on a monthly basis to ensure all cases are managed appropriately and any further support is provided.

We are committed to reporting any incidents to the appropriate regulatory bodies including the UK Charity Commission and government departments or funding bodies, as required. Where there is evidence that criminal activity may have taken place, we will report to the relevant police and/or safeguarding authorities as appropriate.

Reports to the Charity Commission shall be made by the Chief Executive in consultation with the Board of Trustees.

If it is assessed that there is evidence of an incident, or the potential for imminent significant harm, appropriate action will be taken, where possible, on the day the Chief Executive receives the information concerning a reportable incident.

Any complaints made about or directly to CCF will be acknowledged within 24 hours and responded to within 72 hours (at minimum, as an update on position, process and next steps).

6.6 Internal Investigations

CCF have implemented a Whistleblowing Policy aimed at encouraging a culture of openness and accountability wherein staff are confident that they can raise any matter of genuine concern without fear of reprisal in the knowledge that they will be taken seriously and that matters will be investigated appropriately and regarded as confidential.

In the case of allegations made against employees of the Foundation, there should be a full and timely investigation.

Any investigation should be cognisant of the fact that allegations relating to a failure or breach of safeguarding are both potentially serious criminal offences, but if unfounded such allegations can still carry a social stigma which could have a significant negative impact on an individual's personal/professional life.

During any initial investigation the identity of both the accuser and the accused should only be disclosed to those who need to know about it and a high degree of sensitivity is required.

The investigation body will ordinarily be a director supported by the HR team (currently an external, independent organisation contracted by CCF). Any investigation should be completed as rapidly as possible, consistent with its effective conduct. The exception to this is in the case of potential criminal activity where the Police should be called in as a matter of routine.

6.7 Unsubstantiated and false allegations

On very rare occasions, it is possible that an individual could raise an allegation(s) that upon investigation can be found to be unsubstantiated or untrue. If a report is found to be demonstrably false, this behaviour may be indicative of an underlying issue elsewhere which may require further investigation. In such circumstances this should in the first instance be reported to the Chief Executive Officer who will consider whether a further referral should be made to another authoritative body such as the Police or the Social Services.

In the event that a report is found to be malicious or deliberately misleading, a decision will be made in consultation with the Safeguarding Lead as to whether this should be investigated through the Disciplinary Policy and Procedure or even reported to the Police.

If it is established that the allegations were unfounded or malicious, the HR Department will:

- make it clear to those involved that the accused has been exonerated.
- consider whether counselling for the accused and/or accuser is appropriate.
- consider further steps to support the accused.

If an allegation was made with the best intentions, there should be no punitive measures to the reporter and a transparent period of reflection and reparation is made with all parties. CCF commits to fostering an open and honest culture where staff are encouraged to 'speak up' and that there is an understanding that safeguarding and wellbeing are a priority for all.

6.8 Substantiated allegations

Adherence to HR disciplinary procedures will be adopted at all times. Should an allegation be investigated and found to be true resulting in the person leaving the organisation via their own

resignation or dismissal for a statutory safeguarding reason, then the Foundation has a legal obligation to make a referral to the appropriate bodies, including Disclosure and Barring Service (DBS) which was established under the Protection of Freedoms Act 2012.

The Designated Safeguarding Lead/Chief Executive has the duty to report this, including a full report of the investigations and process followed to reach this conclusion, within one month.

6.9 Management of Information

The Foundation complies with the principles of GDPR in the way it collects, holds and disposes of personal information. We have a policy specific to this that staff can access at all times and will make all external parties aware of when required.

7. POLICY REVIEW

This policy, its accompanying procedures and any supporting documents will be reviewed every year or sooner where any changing legislation and/or government guidance has an impact.

Other relevant policies:

Whistleblowing policy	Anti bribery policy
Risk management policy	Bullying and harassment policy
GDPR policy	Social media policy
Various HR and finance policies, some of which have cross over with safeguarding.	
CCF Staff Code of Conduct	
CCF Annual Safeguarding Action Plan	

This process document is designed to support and enhance our safeguarding policy and our risk management policy by expanding on the specifics of our programme operations.

In all instances, CCF has a risk register that captures any anticipated risks to the Charity and will follow protocol outlined by Gov/Charities Commission at all times.

As mentioned in Section 7, all additional CCF policies are available upon request.

This policy was also formed and shaped by the guidance and policies given by:

- The Gov Charities Commission
- NSPCC
- NCVO
- Sport England
- Lifetime Training

---- ENDS ----

All amendments to this policy shown on the next page.

Amendments chart		
Amendment made	By whom	Date

- Section 5.6: Review of the reporting process with amended wording to help staff understand the how to refer concerns.	CEO – Gary Laybourne	18/2/2021
- Section 8: inputted the ‘Programme Specifics’ and dynamics of power to sit within this main document to contextualise our operations and better highlight possible risk points.	CEO – Gary Laybourne	18/2/2021
- Section 4: trustees amended from annual screening to basic DBS check prior to appointment and prior to one or more events in a given calendar year.	CEO – Gary Laybourne	18/10/2021
- Various: the addition of ‘volunteers and contractors’ to the language, definition and actions of our key groups/individuals.	CEO – Gary Laybourne	18/10/2021
- Extension to our opening statement to include the hyperlink to our Incident Report Form	CEO – Gary Laybourne	11/11/2021
- Amendments to language and order of document and better clarification of reporting process	DSL- Amy Fazackerley	10/05/2023
- Removal of Coach Core Programme Specifics section to sit within a separate 1-page document	DSL- Amy Fazackerley	10/05/2023
- Amendments to language and reintroduction of Dynamics of Power visual	DSL- Amy Fazackerley	19/09/2023
- Updated training and DBS position versus roles within the charity	CEO – Gary Laybourne	12/10/2023
-Section 2.8- Added further guidance around Breach of Trust	DSL-Amy Fazackerley	12/10/2024
-Section 4- Review of our M.O.S position for programmes facing staff. Updated Section 4.1 (Key Roles) to reflect shift in safeguarding responsibility to Employment Officer	DSL- Amy Fazackerley	12/10/2024
-Section 6- Inclusion of additional information linked to Learning, Emotional and Social Needs		
-Section 7- Inclusion of Annual Safeguarding Action Plan in associated policies		
-Policy language updated to ensure consistency, as per Ann Craft Trust guidance. ‘Adults at risk’, ‘young people’ and ‘vulnerable adults’ replaced by ‘child’ and ‘adult’ throughout the document	DSL- Amy Fazackerley	17/02/2026