

BUCS SAFEGUARDING POLICY

September 2024

BUCS Safeguarding Policy

Introduction

British Universities and Colleges Sport (BUCS) Safeguarding Policy is one of several policies that are designed to allow the organisation to demonstrate good governance and high levels of operational transparency.

BUCS recognises its responsibility towards safeguarding and this policy is in place to ensure that every individual (which for the purpose of this policy shall be defined as including, but not limited to any student, coach, official, volunteer, BUCS Staff, spectator or university staff member in a BUCS programme), can experience exceptional student sporting experiences, that inspire, develop and unite and are free from abuse, or action that has the potential to cause harm. BUCS recognises its commitment to safeguard all individuals involved in BUCS programmes, not just those covered by specific legislation.

Purpose

Through the provisions outlined in this policy, BUCS aims to:

- Prevent incidents of harm for all individuals wherever possible
- Ensure our Members and partner organisations, including, but not limited to, third party event delivery, are clear on BUCS expectations, roles and responsibilities in safeguarding
- Provide reassurance to Members and partner organisations of the rigour, commitment and comprehensive approach BUCS takes to safeguarding
- Ensure that any concerns or disclosures that are raised to BUCS are dealt with in a confidential, responsible, appropriate and timely manner
- Ensure that BUCS is striving to achieve the highest standards of safeguarding, whilst demonstrating adherence and compliance with sector recognised Safeguarding standards
- Establish clear timelines for the review of BUCS Safeguarding Policy

BUCS also encourages and supports our Members and partner organisations, to adopt and demonstrate their commitment to the principles set out in this Policy.

Scope

For the purpose of this policy, the term programme shall be used to refer to the following, which BUCS deems to be within its safeguarding responsibilities:

- BUCS delivered sporting events.
- Third party delivered BUCS Events.
- GB Students international representation.
- BUCS delivered training events.
- BUCS delivered Member Events.

BUCS does not take responsibility for safeguarding in the league and knockout competitions which are hosted and delivered by Members. In these cases, BUCS considers the responsibility for safeguarding to sit with the Member institutions.

BUCS is aware that some students under the age of 18 may participate in competitions, notably when they are representing Scottish institutions, including when competitions are held in England or Wales. Should a safeguarding concern occur involving an individual under the age of 18 and registered at an institution in Scotland, BUCS will work with Scottish Student Sport to ensure appropriate Safeguarding measures are in place for these students.

Whilst participation in BUCS programmes by under 18s registered in England is not permitted under the current BUCS eligibility regulations, BUCS recognises that this does not eliminate the risk for a safeguarding concern to involve an underage individual. Should such a concern be raised, BUCS will work with the Child Protection in Sport Unit to ensure appropriate safeguarding measures are taken.

POLICY

Principles

BUCS Safeguarding Policy is based on the following principles to ensure that every individual involved in a BUCS programme, can experience exceptional student sporting experiences, that inspire, develop and unite and are free from harm:

- Reporting concerns over safeguarding is everyone's responsibility in Higher Education sport
- All individuals, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment
- All concerns and disclosures shared with BUCS will be investigated and responded to in line with BUCS' safeguarding disclosure management procedures
- In the event that other organisations, including but not limited to Member institutions, need to be involved there will be a triage of reports to ensure that concerns are dealt with through the appropriate organisations
- Confidentiality will be upheld in line with General Data Protection Regulation 2018 and the Human Rights Act 2000
- The rights, dignity and worth of all individuals will always be respected
- BUCS 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 where appropriate
- BUCS is committed to continuous review and development in its Safeguarding work in line with developments in best practice
- The policy aims to distinguish between safeguarding concerns and the reporting of incidents of discipline relating to BUCS Rules and regulations

Roles and Responsibilities

BUCS has a duty of care to safeguard from harm all individuals involved in any programme that it organises and delivers. The responsibilities of BUCS are to:

- Create and regularly review a Safeguarding Policy and associated programme action plans
- Create and advocate safeguarding plans for all programmes it organises and delivers

- Have in place arrangements to work effectively with Members and partner organisations to safeguard and promote the welfare of individuals, including arrangements for sharing information
- Appoint a member of staff as Programme Organiser, who has received appropriate training in advance and who is made known to all participants
- Appoint a member of staff as the designated Programme Lead Safeguarding Officer, who has received appropriate training in advance and who is made known to all participants
- Ensure that all relevant staff have received appropriate and recognised professional development training on safeguarding
- Ensure that there is a clear and known mechanism to receive safeguarding concerns and disclosures
- Establish a clear case management process for all concerns and disclosures that are raised with BUCS
- Ensure clear codes of conduct are in place for staff, volunteers and officials involved in BUCS programmes

Implementation in BUCS Programmes

Implementation of measures outlined in this policy will be iterative. BUCS will ensure the measures below are implemented as a minimum, as well as clear and defined operating policies for all programmes where BUCS deems itself responsible for safeguarding.

Programme Organiser - every BUCS programme will have a named Programme Organiser who has undertaken relevant Safeguarding training. This includes but is not limited to, those events delivered under a third-party agreement. Ideally, this will be a different individual to the Programme Lead Safeguarding Officer, but in some circumstances, they may fulfill both roles. As well as their programme specific duties and training they will also undertake the following:

- Be responsible for overseeing all safeguarding, welfare and safety matters pre, during and post the programme
- Appoint a designated Programme Lead Safeguarding Officer, who has received appropriate training in advance
- In partnership with the Programme Lead Safeguarding Officer, create a safeguarding plan for the programme
- Undertake a safeguarding risk assessment with the Programme Lead Safeguarding Officer
- Ensure that all delivery partners in the programme (e.g. NGB's of sport) have received the safeguarding plan and risk assessment prior to the programme
- Ensure that where necessary, staff, volunteers or officials have undergone Disclosure and Barring Service checks in advance of the event
- Ensure that all staff, volunteers and officials have signed up to BUCS Codes of Conduct for events
- Ensure any consents and medical information have been received before the event
- Have contact details for local statutory services – based on the location of the event

Programme Lead Safeguarding Officer - every BUCS programme will have a named Lead Safeguarding Officer who is responsible for handling safeguarding concerns raised during the programme. Ideally this will be a different individual to the Programme Organiser, but in some circumstances, they may fulfill both roles. As well as their programme specific duties and training they will also ensure the following is in place:

- Have themselves undertaken recognised and regulated safeguarding training.
- Ensure all staff, volunteers and officials have undertaken recognised and regulated Safeguarding training
- Be responsible for the safeguarding of all individuals at the programme
- Support the Programme Organiser to create and share a Safeguarding plan for the programme
- Undertake and create a safeguarding risk assessment for the programme in partnership with the Programme Organiser
- Provide a safeguarding briefing for all staff, volunteers and officials prior to the programme
- Ensure that all staff and volunteers and officials understand their safeguarding responsibilities and how to report any concerns or disclosures
- Report any concerns or disclosures raised during the event to the Programme Organiser.

Programme Safeguarding Plan - this will cover the following aspects:

- Appointment of a Programme Lead Safeguarding Officer
- Creation of a safeguarding risk assessment for the programme
- Contain details of the training that staff, volunteers and officials have undertaken in advance of the programme
- Contain details of any known individuals at risk and their support needs who are attending the programme
- Contain details of the case management process at the event should a concern or disclosure be raised at the programme
- Include details of partners safeguarding responsibilities at the event
- Ensure a safeguarding briefing for all staff, volunteers and officials is delivered prior to the programme
- Ensure that all staff, volunteers and officials understand their safeguarding responsibilities and how to report any concerns or disclosures

Programme Risk Assessment - this will cover all potential risks regarding the health, safety, protection, and well-being of individuals. The risk assessment will be reviewed and updated at regular intervals and shared with all staff, officials and volunteers involved in the programme. A record of the programme risk assessment will be kept.

Our Commitment

In addition to the above outlined steps to address safeguarding management, BUCS is committed to the following steps, to further drive exceptional student sporting experiences:

- BUCS will identify a staff member to fulfil BUCS' safeguarding responsibilities and they will undertake formal professional development training in this area
- Safeguarding will be included as a standing agenda item in its Governance and Nominations Committee and Board meetings
- A BUCS Trustee shall hold a welfare and safety lead role on the Board and engage with BUCS Executive
- BUCS will ensure compliance with the Ann Craft Trust Safeguarding Adults Framework

Procedure

How to Raise a Safeguarding Concern to BUCS.

A report should be made to BUCS when there is concern for the welfare and safety of an individual.

Reporting concerns over safeguarding is everyone's responsibility in higher education sport.

In the first instance individuals should raise a concern or disclosure with the BUCS Lead Safeguarding Officer at the programme who will support the individual to raise the concern through the BUCS system. The BUCS Safeguarding Report Form can be [accessed by this link](#). If the person raising the concern considers the situation to be life-threatening, then they should call 999.

Concerns or disclosures must be made via the BUCS Safeguarding disclosure form. The form will capture information including, but not limited to:

- Name and contact details of individual reporting
- Details of incidents or concerns
- Information relating to the incident being reported, including as much detail as possible and the reason they are particularly concerned about the situation

The individual making the disclosure does not have responsibility to determine if abuse has occurred but does have responsibility to act.

Once BUCS receives notification of a concern or disclosure, they shall review the case and make an initial threshold assessment. Notification of this assessment outcome shall be shared with the discloser within 5 working days, if a report contains contact details. If a threshold is then deemed to be met, the BUCS Safeguarding Panel shall then convene to discuss and investigate further. As soon as the BUCS receives written notification of an incident, concern or disclosure they assume management of the case (provided it is not being dealt with by the police and/or Local Authority Services). The panel shall respond to the concern or disclosure raised within 28 days of receipt. When a disclosure is made, BUCS will liaise with the appropriate institution to ensure a thorough investigation is conducted and action taken where appropriate.

In circumstances where BUCS does not have the information it needs to continue with the investigation, the investigation timeline will be paused until a time in which the required supporting information has been obtained. Therefore, there may be instances due to circumstances arising from the investigation or unforeseen events, where the investigation takes longer than the intended 28 working days however, the investigator will keep the complainant updated at regular intervals. During

the investigation BUCS reserves the right to share complaint information with third party organisations, where there is an agreement in place for this purpose.

Handling

BUCS Safeguarding Policy is based on the following principles to ensure that every individual involved in a BUCS programme, can experience exceptional student sporting experiences, that inspire, develop and unite and are free from harm:

- All individuals, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment
- Confidentiality will be upheld in line with General Data Protection Regulation 2018 and the Human Rights Act 2000
- The rights, dignity and worth of all individuals will always be respected
- BUCS 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 where appropriate
- All concerns and disclosures shared with BUCS will be investigated and responded to in line with BUCS safeguarding disclosure management procedures

Review

BUCS Safeguarding Policy will be reviewed annually by the BUCS Safeguarding lead, supported by the Governance and Compliance Team. The review will be presented to the Governance and Nominations Committee and BUCS Board for approval. The date of the next review is September 2025, unless changes in policy, governance or other circumstances require a review prior to this date.

Further Information

<https://www.anncrafttrust.org>

Appendices:

Legislation

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

- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Making Safeguarding Personal Guide 2014
- Deprivation of Liberty Safeguards 2005
- Disclosure & Barring Service 2013
- 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
- General Data Protection Regulation 2018

Glossary of Terms

- **Adult:** anyone over the age of 18
- **Adult at Risk:** someone who is aged 18 or over who is experiencing, or is at risk of abuse or neglect, has care and support needs and because of their care and support needs cannot protect themselves against actual or potential abuse or neglect
- **Safeguarding adults at risk:** enabling individuals to achieve the outcomes that matter to them in their life; protecting their right to live in safety, free from abuse and neglect. Empowering and supporting them to make choices, stay safe and raise any concerns. Beginning with the assumption that an individual is best placed to make decisions about their own wellbeing, taking proportional action on their behalf only if someone lacks the capacity to make a decision, they are exposed to a life-threatening risk, someone else may be at risk of harm, or a criminal offence has been committed or is likely to be committed
- **Child:** anyone under the age of 18
- **Safeguarding children:** protecting children from abuse and neglect, preventing the impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances

Types of Harm and Abuse

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern.

- **Domestic abuse and coercive control:** including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members
- **Discriminatory abuse:** 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
- **Emotional or psychological abuse:** this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks
- **Financial or material abuse:** including 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

- Modern slavery: encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- Neglect: including ignoring medical or physical care needs, failure 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
- Organisational abuse: including 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 abuse: including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions
- Radicalisation, extremism and terrorist behaviour: Radicalisation is the process by which a person comes to support terrorism and/or forms of extremism
- 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
- Sexual abuse: including 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