

# SAFEGUARDING

Policy statement on  
safeguarding children  
and vulnerable adults



Centre for Sport  
& Human Rights



## **POLICY STATEMENT ON SAFEGUARDING CHILDREN AND VULNERABLE ADULTS**

Safeguarding is integrated throughout the policies of the Centre for Sport and Human Rights as a cross-cutting and integrated responsibility for everyone associated with us at all times.

The principal safeguarding provisions can be found integrated into:

- The **Code of Conduct**. The Code of Conduct can be found on our website. The Code of Conduct is relevant to everyone (as defined at Clause 2.2 of the Code of Conduct). Safeguarding is included at Clause 4 and Preventing sexual exploitation, abuse and harassment is included at Clause 6.
- The **Policy Handbook**. The Policy Handbook can be found on our website. The Policy Handbook is relevant to everyone (as defined at Clause 1.3 of the Policy Handbook). Our Policy on Working with Children and Vulnerable Adults is included at Clause 3 and our Social Media Policy is included at Clause 4 of the Policy Handbook.
- The **Advisory Council Policy**. The Advisory Council Policy is applicable to all the Members of the Advisory Council, each an organisation. Safeguarding is included at Clause 11 of the Advisory Council Policy.
- The **Safe Recruitment Procedure**. The Safe Recruitment Procedure is an internal document that demonstrates how Centre embeds safeguarding in our recruitment and onboarding processes. It is available upon request.

We understand the following terms to be defined as follows:

- **"Child"** or **"Children"** means every human being below the age of eighteen years;
- A **"Vulnerable Adult"** means populations that live in poverty without access to safe housing, water, sanitation and nutrition and those who are stigmatised, discriminated against, marginalised by society and even criminalised in law, policy and practice.

If there is a breach of any safeguarding provision under any of our policies, the breach will be governed by the policy itself. We take safeguarding extremely seriously and, following due investigation, reserve the right to terminate our relationship with any individual or organisation as a result of a safeguarding breach.

We encourage everyone to assist us in keeping the world of sport safe for children and vulnerable adults. As a result, we encourage you to report any breaches of our

safeguarding provisions through our website at [www.sporhumanrights.org/safeguarding](http://www.sporhumanrights.org/safeguarding) or by emailing [safeguarding@sporhumanrights.org](mailto:safeguarding@sporhumanrights.org).

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## Excerpt 1 – Clause 4 of the Code of Conduct

### 4. SAFEGUARDING

- 4.1 We are committed to the respect, protection and promotion of the rights of children and vulnerable adults. We recognise our moral and legal obligations to protect children and vulnerable adults who come into contact with CSHR from both intentional and unintentional harm (a duty of care). This includes the safeguarding of children, young people and vulnerable adults, including their images and stories, in offline and online environments.
- 4.2 We take a zero-tolerance approach to any form of bullying, harassment, physical, emotional or sexual abuse or sexual exploitation. In all actions and decisions, the welfare of the child and/or the vulnerable adult and their best interests will be the paramount consideration for all that we do. We are committed to ensuring that Everyone working with or for CSHR in any capacity does not harm, abuse or commit any act of violence against a child or vulnerable adult or take action or fail to act, resulting in risk to a child or vulnerable adult.
- 4.3 CSHR recognises that all children have the equal right to protection from harm and all adults have a responsibility to act if they suspect a child is at risk of harm or has been harmed. We are committed to taking actions in the best interest of the child as we work to secure children's rights as outlined in the UN Convention on the Rights of the Child.
- 4.4 Ensuring an environment that prevents violence against children and vulnerable adults requires Everyone to be clear on what is expected of them, and be fully aware of conduct that will always be unacceptable. This means that each Relevant Person agrees not to:
- 4.4.1 abuse, exploit, harass or bully a child, young person or vulnerable adult or behave in any way that places a child or vulnerable adult at risk of harm or causes harm;
  - 4.4.2 act in a way that places children or vulnerable adults at risk of physical or emotional harm or sexual exploitation;
  - 4.4.3 engage in any form of sexual activity or develop physical or sexual relationships with anyone under the age of 18 regardless of the age of consent locally (mistaken belief in the age of the child is not a defence);
  - 4.4.4 engage in sexual relationships with youth aged 18 to 24 years who are in any way involved in the work of CSHR;
  - 4.4.5 use physical punishment towards children or vulnerable adults;
  - 4.4.6 take a child or vulnerable adult with whom they are in contact through the context of work with CSHR to their home or that of another Relevant Person;

- 4.4.7 sleep in the same room or bed as a child or vulnerable adult in a work-related context;
  - 4.4.8 put themselves in a position where they are working alone with a child or vulnerable adult, including online. Where this is unavoidable, it must be with the prior permission of CSHR's Head of Safeguarding and Protection;
  - 4.4.9 condone or participate in behaviour of children or vulnerable adults which is illegal, unsafe or physically or emotionally abusive;
  - 4.4.10 use information communication technology and/or social media to abuse, exploit, harass or bully a child or vulnerable adults;
  - 4.4.11 use information communication technology to access, view, create, download, share, or distribute child sexual or physical abuse materials.
- 4.5 Each Relevant Person must:
- 4.5.1 be aware of the power imbalance between an adult and a child or a vulnerable adult and avoid taking any advantages this might provide; and
  - 4.5.2 inform CSHR immediately of any civil or criminal proceedings of any nature pending in any respect of any allegation concerning any type of harm to a child or children or vulnerable adults.
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## **Excerpt 2 – Clause 6 of the Code of Conduct**

### **6. PREVENTING SEXUAL EXPLOITATION, ABUSE AND HARRASSMENT**

- 6.1 We are committed to providing a safe environment where everyone is entitled to work and volunteer without threat of or actual harassment and bullying. We operate a zero-tolerance policy for any form of bullying or harassment, including sexual misconduct, and treat all complaints seriously and with confidentiality and respect. Any person who has felt bullied or harassed will always be encouraged to raise their concern with their line manager (where applicable), or if inappropriate to do so, with the Deputy Chief Executive or the Chief Executive (as you feel appropriate). Any person found to have bullied or harassed another will face immediate and appropriate disciplinary action, including dismissal or exclusion from CSHR.
- 6.2 Provided that you act in good faith (i.e. you genuinely believe that what you are saying is true) then you have the right to not be victimised or face negative consequences for making any complaint. However, making a complaint or giving evidence that you know to be untrue may result in disciplinary action being taken against you. For further information please refer to the Whistleblowing Policy in the Policy Handbook.
- 6.3 Staff should read this policy in conjunction with the Bullying and Harassment sections of our Employee Handbooks.
- 6.4 For the avoidance of doubt, for the purposes of this Code:

- 6.4.1 bullying is defined as offensive, intimidating, malicious or insulting behaviour, and/or a misuse of power through means that undermine, humiliate or injure the person (or group) on the receiving end; and
- 6.4.2 harassment means any unwanted conduct, verbal or physical, that makes or is intended to make someone feel intimidated, degraded, humiliated, offended or that their privacy is being invaded and related to the Protected Characteristics, or any additional protected characteristics detailed in the relevant legislation where we are registered, including, for example those protected characteristics set out in the UK Equality Act 2010 (sex, gender reassignment, gender identity, race, ethnicity, religion or beliefs, sexual orientation, marriage and civil partnership, pregnancy and maternity, physical ability or age);
- 6.4.3 sexual harassment is any conduct of a sexual nature which is unwanted and unwelcome by the recipient. Anyone can be a victim of sexual harassment, regardless of their gender and the gender of the harasser. Harassment does not always need to be repeated and persistent; a single incident can be harassment if significantly serious; and
- 6.4.4 victimisation happens when a Relevant Person has complained about bullying, harassment or discrimination, or has supported a colleague in their complaint, and is then treated less favourably as a result.
- 6.5 At all times and in all circumstances, you must strictly not engage in, condone or tolerate bullying, abuse or harassment in any form. For the avoidance of doubt this includes a duty on Everyone to challenge (and minute or otherwise put on record) any concerns related to these actions in any and all fora of CSHR.
- 6.6 You must not contribute to creating an unsafe, intimidating, abusive or discriminatory environment for any people you interact with.
- 6.7 Everyone has an active and encouraged role in preventing, deterring, denouncing and reporting harassment and abusive conduct and promoting a safe and harmonious work environment as far as possible.
- 6.8 Everyone is responsible for being aware of CSHR's relevant policies and options available for dealing with abusive conduct and harassment.
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### Excerpt 3 – Clause 3 of the Policy Handbook

#### 3. POLICY ON WORKING WITH CHILDREN AND VULNERABLE ADULTS

- 3.1 We acknowledge that violence against children and vulnerable adults happens throughout the world, in all settings, including in and around sport. This policy sets out our expectations of how Everyone must respect children and vulnerable adults and makes clear the standards applied and those actions that are not tolerated with respect to safeguarding.

- 3.2 Everyone must ensure that they are familiar with and adhere to the Code of Conduct, which must be considered prior to any activity that impacts on children or vulnerable adults, including their images, stories, and data.
- 3.3 As set out in the Code of Conduct, we take a zero-tolerance approach to any form of bullying, harassment, physical, emotional or sexual abuse or sexual exploitation. This approach is re-emphasised with respect to children and vulnerable adults. In all actions and decisions, the welfare of children and vulnerable adults and their best interests will be the paramount consideration for all that we do. We are committed to ensuring that anyone working or associated with us in any capacity does not harm, abuse or commit any act of violence against a child or a vulnerable adult or take action or fail to act, resulting in risk to a child or vulnerable adult.
- 3.4 We are committed to take actions in the best interest of the child as we work to secure children's rights as outlined in the UN Convention on the Rights of the Child and vulnerable adults' rights as outlined in the [to include relevant protection for vulnerable adults]. We recognise that all children and vulnerable adults have the equal right to protection from harm and Everyone has a responsibility to act if they suspect a child or vulnerable adult is at risk of harm or has been harmed.
- 3.5 It is essential that risk is assessed before engaging children or vulnerable adults. Should you consider that any work you do with or for us may lead to any interaction with children or vulnerable adults, or directly involve impact on children or vulnerable adults, you will promptly, and, prior to taking any other actions, notify our Head of Safeguarding and Protection.
- 3.6 In the context of any activities you undertake away from CSHR (for example your work for an Advisory Council member organisation or other third party), you are still welcome to discuss queries or concerns with our Head of Safeguarding and Protection. Where you are unsure, you are strongly encouraged to err on the side of caution and notify us.
- 3.7 When our activities or programmes plan to involve children or vulnerable adults, we will assess risk, and ensure we have relevant procedures and strategies in place to minimise any identified risk to protect children and vulnerable adults from harm prior to undertaking such programmes or activities. Where appropriate these risk mitigation strategies will also be incorporated into the design, delivery and evaluation of the programme(s).
- 3.8 If we engage in work with a partner organisation who will have direct contact with children or vulnerable adults in order to undertake the relevant work, the agreement will state the responsibility of the partner(s) to develop and implement a child and/or a vulnerable adult safeguarding policy and procedures, including necessary risk assessments.
- 3.9 For the avoidance of doubt, and in accordance with the Code of Conduct, undertaking any CSHR activities which involve or directly impact children or vulnerable adults is not permitted without express permission from our Head of Safeguarding and Protection or the Chief Executive. It is also important to note that the Code of Conduct includes a duty on each Relevant Person to report any information concerning any perceived or actual behaviour, incidents or facts which may evidence or amount to a breach.

- 3.10 We take all reasonable precautions to ensure Staff, Directors, consultants, interns and volunteers do not pose a risk to children and we are proactive about building the capacity of our own Staff to understand their roles and responsibilities with respect to safeguarding. Our Head of Safeguarding and Protection will participate in specific trainings to be able to fulfil that role appropriately, monitor the implementation of our safeguarding commitments, provide or coordinate appropriate and regular safeguarding training to Staff and Directors, review all policies to ensure compatibility with our safeguarding commitments, and develop additional procedures where necessary for implementation.
- 3.11 Many of our activities take place online, and we generate a large number of communications materials and outputs in the conduct of our work. As we do so, we are committed to representing children and vulnerable adults with dignity and respect and to at all times taking steps to meet our obligations for the best interest of the child, including as relates to their images, stories, and data. This commitment includes:
- 3.11.1 Protecting the best interest of the child over any other consideration, including advocacy for children's issues.
  - 3.11.2 Avoiding communicating questions, attitudes and comments that are judgmental, insensitive to cultural values, cause embarrassment or humiliation, or that reactivate trauma for a child or vulnerable adult.
  - 3.11.3 Avoiding the involvement of children or vulnerable adults in any story that puts them at risk of familial, community or political backlash.
  - 3.11.4 Never using the full name or information that identifies the place of residence of any child or vulnerable adult, including in file names when sharing any images or files electronically, and never showing the face of any child known to be a victim of abuse.
  - 3.11.5 Taking all precautions to ensure an informed decision where a young person over the age of 18 wishes to have their identifying information shared.
  - 3.11.6 Respecting and complying with the child's wish to not have something reported, and taking into account child's right to participate, when in the best interest of the child.
  - 3.11.7 Obtaining permission from the child and the child's parent or guardian for images or text about the child or family to be used, including an explanation of the intended purpose.
  - 3.11.8 Ensuring authenticity by accurately portraying any child or vulnerable adult in their environment, and by not staging stories or photos, including by never asking anyone to adopt a contrived, artificial position or tell a story that is not their own. Communications should seek to understand and present the reality and context. Accurate captions should accompany all photos.
  - 3.11.9 Seeking to empower the children or vulnerable adult by giving them as much control as possible. This means that their views about their situation and their direct quotes should be used as much as possible. Practices that give control over production of the story to children/vulnerable adults are encouraged, for

example by permitting children to record images in the way they choose, considering children acting as journalists, or youth as paid reporters at our events, where relevant.

- 3.11.10 Reporting back to children/vulnerable adults after the story or photo or video has been published is strongly encouraged as a mark of respect and to increase understanding about how their input has been used.
- 3.11.11 Storing any images of children or vulnerable adults in a secure and password protected format.
- 3.12 We recognise the value of photography at our events and in our work, and in accordance with this policy take specific precautions when photos feature children or vulnerable adults:
  - 3.12.1 For group photos it should be explained to the group of adults and/or children what the photographs will be used for and consent should come from individuals in the group. Any individual who does not wish to be part of the photo, should be able to opt out, without it negatively impacting their participation in the event.
  - 3.12.2 For general photos, when using images of children in crowd scenes where it may be difficult or impossible to get consent, please consider:
    - (a) Would they expect their photograph or video to be taken at the event? Is it a public space/event?
    - (b) Is it unlikely that anyone would object to the photo or video being taken?
  - 3.12.3 When taking photos or video at a planned event, let people know in advance that this will happen and how the images will be used so that they can opt out of the event or notify the organizers that they do not want their image used.
- 3.13 In accordance with General Comment No. 12 to the UN Convention on the Rights of the Child, the following nine basic requirements must be respected for all processes in which children are heard and participate, including the reporting process. Everyone should be familiar with and follow these requirements:
  - 3.13.1 Transparent and informative: Children must receive full, accessible, diversity-sensitive and age-appropriate information about their right to express their views freely and to have their views given due weight, and about how this participation will take place, its scope, purpose and potential impact;
  - 3.13.2 Voluntary: Children should not be coerced into expressing views against their wishes and must be informed that they can cease involvement at any stage;
  - 3.13.3 Respectful: Children's views must be treated with respect, and children should be provided with opportunities to initiate ideas and activities. Persons and organisations working for and with children should respect children's views with regard to participating in events and meetings;
  - 3.13.4 Relevant: Children should draw on their knowledge, skills and abilities to express their views on relevant issues. Space needs to be created to enable

children to highlight and address issues they have identified as relevant and important;

- 3.13.5 Child-friendly environment: Environments and working methods should be adapted to children's capacities. Adequate time and resources should be available to ensure that children are well prepared and have the confidence and opportunity to contribute their views to the process;
- 3.13.6 Inclusive: Children are not a homogeneous group and participation needs to provide for equality of opportunity for all, including marginalized children, without discrimination on any grounds, including age, and be culturally sensitive to children from all communities. Special measures should be taken to include very young children and children from marginalized communities;
- 3.13.7 Supported by training: Adults need preparation, skills and support to facilitate children's participation effectively. Children also require capacity-building to strengthen their skills relevant to the reporting process, for example, in effective participation, awareness of their rights, public speaking and advocacy;
- 3.13.8 Safe and sensitive to risk: Adults have a responsibility towards the children with whom they work and must take every precaution to minimize the risk of violence, exploitation or any other negative consequences of their participation. Organizations facilitating child participation in the reporting process must have a clear child-protection policy in place for all the children who take part in activities related to this process;
- 3.13.9 Accountable: Children who have taken part in the reporting process (including in research, consultations, or the drafting the report) should be informed about how their views will be interpreted and used. CSHR will commit to ensuring that where we engage in any reporting processes that we will remain accountable through the process.

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#### **Excerpt 4 – Section of clause 4 of the Policy Handbook**

- 4.7 You must always show respect to others when using social media. A Relevant Person must never criticise CSHR, our clients, suppliers, business associates, or anybody else you come into contact with professionally through CSHR. Our other policies, in particular our Code of Conduct give guidance on the type of behaviour we consider unacceptable in the workplace, and we expect you to maintain the same high standards when online and using social media. Specifically, we will not tolerate any of the following:
  - 4.7.1 abusive or threatening language or images;
  - 4.7.2 sexually explicit language or images;
  - 4.7.3 unlawful or disrespectful comments;
  - 4.7.4 trolling (starting or pursuing arguments in an online community with the intention of disrupting normal discussions within that community);

4.7.5 false or misleading statements;

4.7.6 impersonating your colleagues or third parties; or

4.7.7 inciting somebody to commit a crime.

If any other Relevant Person is using social media to bully, harass or victimise you, you must follow the process in our Code of Conduct.

# CONTACT

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CLIFFORD  
CHANCE



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