



## Safeguarding Adults at Risk Policy

### Introduction

The Clay Pigeon Shooting Association Ltd (CPSA) is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults at risk involved in shooting in accordance with the Care Act 2014.

The CPSA will encourage its members, shooting grounds, clubs and businesses) to adopt and demonstrate their commitment to the principles and practice as set out in this Policy.

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## **1. Principles**

2.1 The guidance given in the Policy is based on the following principles:

- 2.1.1 All adults<sup>1</sup>, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or transgender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- 2.1.2 The CPSA will seek to ensure that our sport is inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.
- 2.1.3 The rights, dignity and worth of all adults will always be respected.
- 2.1.4 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.
- 2.1.5 We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk'<sup>2</sup>.
- 2.1.6 We all have a shared responsibility to ensure the safety and well being of all adults and will act appropriately and report concerns whether these concerns arise within shooting (e.g. inappropriate behaviour of a coach) or outside (e.g. in the wider community).
- 2.1.7 All allegations will be taken seriously and responded to quickly in line with this policy.
- 2.1.8 The CPSA 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<sup>3</sup>.
- 2.1.9 This policy and its procedures are mandatory and in line with that also in place by British Shooting.

## **2.2 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 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

### 3 Guidance and Legislation

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

- The Data Protection Act 1994 and 1998
- The Human Rights Act 1998
- The Care Act 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2010
- The Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Mental Capacity Act 2005
- Domestic Violence, Crime and Victims (Amendment ) Act 2012

### 4 Definitions

4.1 To assist working through and understanding this Policy a number of key definitions need to be explained:

4.1.1 **Adult or Vulnerable Adult or Adult at Risk?** In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse. Vulnerable is believed to be a disempowering term. To describe the adults who we are referring to in this document, we will use the definition from the Safeguarding Adults in Sport Steering Group (2013):

*'When we are speaking about adults at risk we are referring to those who have health or social care needs (irrespective of whether or not those needs are being met by social services) and who are unable to safeguard themselves as a result.*

*While we recognise that some people will be vulnerable due to their learning disability or mental health needs there are also those adults who are at risk due to a specific circumstance they may find themselves in, for example: domestic abuse; forced marriage; and sexual or commercial exploitation (this is not an exhaustive list).*

***In sport this may look like but is not limited to:***

- *a player being sent threatening and sexually explicit text messages from their coach;*
- *a member of a learning disabled sports club being exploited by another member who regularly takes money from them at lunch.*

#### **Adults at Risk**

- The Care Act (2014) replaces 'No Secrets (2000) definition of 'Vulnerable Adult'
- Explicitly applies to those aged over 18 even if they may be receiving what may be thought of as a "children" or "young people's" service
- Care and Support Needs:  
"The adult's needs arise from or are related to a physical or mental impairment or illness. Local authorities must consider at this stage if the adult has a condition as a result of either physical, mental, sensory, learning or cognitive disabilities or illnesses,

substance misuse or brain injury. A formal diagnosis of the condition should not be required”.

(Care Act statutory guidance)

- Includes carers

4.1.2 **Abuse** is a violation of an individual’s human and civil rights by another person or persons. See section 5 for further explanations.

4.1.3 **Adult** is anyone aged 18 or over.

4.1.4 **At Risk** is a term which has become broadly accepted to mean that someone may be more vulnerable to abuse than someone else. For example an adult with a learning disability may well be more at risk of financial abuse as they may struggle with managing their finances, this could leave them at risk from an unscrupulous person.

4.1.5 **Capacity** refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity.

## 5 Types of Abuse

5.1 **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.

5.2 **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.

5.3 **Domestic Abuse** – including psychological, physical, sexual, financial, emotional abuse.

5.4 **Discriminatory** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act. Research tells us that bullying of vulnerable groups can be an issue in sport. In a shooting setting this could be the harassing of an individual because they are or are perceived to be transgender.

5.6 **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. In a shooting setting, this could be training without a necessary break.

5.7 **Physical Abuse** – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.  
In a shooting setting, this could be a coach intentionally striking an athlete.

5.8 **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.

In a shooting setting, this could be a fellow athlete who sends sexually explicit text messages to an adult they are training alongside.

- 5.9 **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. In a shooting setting, this could be someone taking equipment from another athlete.
- 5.10 **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 hearing.  
In a shooting setting, this could be a coach not ensuring athletes have access to water.
- 5.11 **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.  
In a shooting setting, this could be an athlete threatening another athlete with physical harm and persistently blaming them for poor performance.
- 5.12 **Cyber Bullying** – cyberbullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it. See section 12.

Results from:

[www.huwy.eu/uk/topics/cyberbullying/cyberbullying-definition/old.digizen.org/cyberbullying/fullguidance/understanding/default.aspx](http://www.huwy.eu/uk/topics/cyberbullying/cyberbullying-definition/old.digizen.org/cyberbullying/fullguidance/understanding/default.aspx)

## 6 Signs and Indicators of Abuse

- 6.1 Abuse can take place in any context and by all manner of perpetrator. There are many signs and indicators that may suggest someone is being abused, these include but are not limited to:
  - 6.1.1 Unexplained bruises or injuries – or lack of medical attention when an injury is present.
  - 6.1.2 Person has belongings or money going missing
  - 6.1.3 Person is not attending / no longer enjoying their shooting sessions
  - 6.1.4 Someone losing or gaining weight / an unkempt appearance
  - 6.1.5 A change in the behaviour or confidence of a person.
  - 6.1.6 They may self harm.
  - 6.1.7 They may have a fear of a particular group or individual
  - 6.1.8 They may tell you / another person they are being abused – i.e. a disclosure.

## **7 What to do if you have a concern or someone raises concerns with you.**

- 7.1 You may become aware that abuse or poor practice is taking place, suspect abuse or poor practice may be occurring or be told about something that may be abuse or poor practice and you must report this to the CPSA Safeguarding Officer (SO), or, if the SO is implicated then report to the CPSA CEO.
- 7.2 If you are at an international event and have a concern then speak to your Team Manager.
- 7.3 If you are concerned someone is in immediate danger please contact the police.
- 7.4 It is important when considering your concern that you also consider the needs and wishes of the person at risk, taking into account the nature of the alert, more information on this is given in Appendix 1 'The Legislative Framework'

## **8 How to Record a Disclosure**

- 8.1 Make a note of what the person has said using his or her own words as soon as practicable and complete an Incident Form, submit to the SO.
- 8.2 Describe the circumstances in which the disclosure came about.
- 8.3 Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- 8.4 Be mindful of the need to be confidential at all times, this information must only be shared with your SO or their substitute and others on a need to know basis.
  - Consent must be obtained from the person affected.
  - Information can also be shared without consent where the 'vital interests' of the individual are affected (and he or she cannot give consent or consent cannot reasonably be obtained); or where there is a legal duty.
  - Liaise with the family/carers, providing they are not implicated and the person consents.
- 8.5 Share your concern either verbally or in writing with the SO or their substitute.
- 8.6 If the matter is urgent and relates to the immediate safety of an adult at risk then contact the police immediately.

## **9 Roles and Responsibilities of those within the CPSA network.**

- 9.1 The CPSA is committed to having the following in place:
  - 9.1.1 A Safeguarding Officer to produce and disseminate guidance and resources to support the Policy and procedures.
  - 9.1.2 A clear line of accountability within the organisation for work on promoting the welfare of all adults.
  - 9.1.3 Procedures for dealing with allegations of abuse or poor practice against members of staff and volunteers.
  - 9.1.4 A Steering Group that effectively deals with issues, manages concerns and refers to a disciplinary panel where necessary (i.e. where concerns arise about the behaviour of someone within the CPSA).

- 9.1.5 A Disciplinary Panel will be formed as required for a given incident.
- 9.1.6 Arrangements in place to work effectively with other organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- 9.1.7 Appropriate whistle blowing procedures and an open and inclusive culture that enables safeguarding and equality and diversity issues to be addressed.

## **10 Good Practice, Poor Practice and Abuse**

### **Introduction**

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental.

It is not the responsibility of any individual involved in shooting to make judgements regarding whether or not abuse is taking place, however, all CPSA personnel have the responsibility to recognise and identify poor practice and potential abuse, and act on this if they have concerns.

### **10.1 Good practice**

The CPSA advises that coaches of adult athletes:

#### **Should:**

- Aim to make the experience of shooting fun and enjoyable.
- Promote fairness and playing by the rules.
- Not tolerate the use of prohibited or illegal substances.
- Treat all adults at risk equally and preserve their dignity; this includes giving more and less talented members of a group similar attention, time and respect.

#### **Coaches and those working directly with adults at risk should:**

- Respect the developmental stage of each athlete and not risk sacrificing their welfare in a desire for team or personal achievement.
- Ensure that the training intensity is appropriate to the physical, social and emotional stage of the development of the athlete.
  
- Work with adults at risk, medical advisers and their carers (where appropriate) to develop realistic training and competition schedules which are suited to the needs and lifestyle of the athlete, not the ambitions of others such as coaches, team members, parents or carers.
- Build relationships based on mutual trust and respect, encouraging adults at risk to take responsibility for their own development and decision-making
- Always be publicly open when working with adults at risk:
  - avoid coaching sessions or meetings where a coach and an individual athlete are completely unobserved.
- Maintain an appropriate and open environment.
- Avoid unnecessary physical contact with young people and adults. Physical contact (touching) can be appropriate so long as:
  - it is neither intrusive nor disturbing

- the athlete's permission has been openly given
- it is delivered in an open environment
- Maintain a safe and appropriate relationship with athletes and avoid forming intimate relationships with athletes you are working with as this may threaten the position of trust and respect present between athlete and coach.
- Be an excellent role model by maintaining appropriate standards of behaviour.
- Gain the adult at risk consent and, where appropriate, the consent of relevant carers, in writing, to administer emergency first aid or other medical treatment if the need arises.
- Be aware of medical conditions, disabilities, existing injuries and medicines being taken and keep written records of any injury or accident that occurs, together with details of treatments provided.
- Arrange that someone with current knowledge of emergency first aid is available at all times.
- Gain written consent from the correct people and fill out relevant checklists and information forms for travel arrangements and trips. This should be the adult themselves if they have capacity to do so.

## 10.2 Poor practice

The following are regarded as poor practice and should be avoided:

- Spending excessive amounts of time alone with an adult at risk.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allowing or engaging in inappropriate touching of any form.
- Using language that might be regarded as inappropriate by the adult at risk and which may be hurtful or disrespectful.
- Making sexually suggestive comments, even in jest.
- Reducing an adult at risk to tears as a form of control.
- Letting allegations made by an adult at risk go uninvestigated, unrecorded, or not acted upon.
- Taking an adult at risk alone in a car on journeys, however short.
- Inviting or taking an adult at risk to your home or office where they will be alone with you.
- Sharing a room with an adult at risk.

**Note:** *At times it may be impractical to avoid some of these particular examples of poor practice. In this case, to protect both the adult at risk and yourself, seek written consent from the adult at risk and, where appropriate, their carers.*

If, during your care, you accidentally injure an adult at risk, they seem distressed in any manner, appear to be sexually aroused by your actions, or misunderstand/misinterpret something you have done, report these incidents as soon as possible to SO, CEO, Head Coach or Team Manager and make a brief written note of it. It may also be in the best interests of the adult at risk to discuss the matter with them openly and with others present and in a professional and sensitive manner that will avoid embarrassment; this is dependent on the individual athlete and the circumstances.





## **11 Whistle Blowing**

See Whistle Blowing Policy

## **12 Social Media**

### **12.1 How to Protect Yourself Online?**

- The CPSA has a separate Social Media Policy.

## **13 Photography**

### **13.1 Events**

Event organisers must set up an accreditation procedure, where anyone wishing to take photographs can be registered.

- Professional photographers should seek accreditation with the event organiser by producing their professional identification for the details to be registered.
- Amateur photographers should seek accreditation with the event organiser by producing their club or registration card and a letter from their club.
- Spectators wishing to take photographs should register their intent with the organiser.

### **13.2 Photography as a Coaching Aid**

Coaches must discuss the use of video or still photography with the shooters.

### **13.3 If you have concerns**

If you are concerned about any photography taking place at an event, contact the organiser and discuss it with them.

### **13.4 Use of Photographs**

Written permission must be obtained from the adult before photographs are used including on websites.

## **Further Information**

Other policies, procedures and supporting information can also be found on [www.cpsa.co.uk](http://www.cpsa.co.uk)

## **Review date**

This policy will be reviewed no later than September 2018 or sooner in the event of legislative changes or revised policies and best practice.



## Appendix 1

### Key Government Initiatives and Legislation

#### ■ Sexual Offences Act 2003

The Sexual Offences Act introduced a number of new offences concerning vulnerable adults and children. [www.opsi.gov.uk](http://www.opsi.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 there should be least restrictive intervention.

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

[www.opsi.gov.uk](http://www.opsi.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. [www.dca.gov.uk](http://www.dca.gov.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/government/publications/care-act-2014-statutory-guidance-for-implementation](http://www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation)

#### ■ Making Safeguarding Personal Guide 2014

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

[www.local.gov.uk/publications//journal\\_content/56/10180/6098641/PUBLICATION](http://www.local.gov.uk/publications//journal_content/56/10180/6098641/PUBLICATION)