



SAFEGUARDING POLICY

Revised 21/03/2024

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Purpose

1. This policy outlines GamLEARN's (**the Charity**) commitment to Safeguarding, its responsibilities, an assessment of potential risks, steps taken to reduce those risks and the steps that should be taken in the event of the Charity becoming aware of a safeguarding issue.

Policy Statement

2. GamLEARN is committed to pro-actively safeguarding vulnerable adults with whom the staff or anyone acting on our behalf, come into contact with during any activity related to the charity. Examples of GamLEARN activities in which staff may encounter vulnerable adults include: GamLEARN courses and delivery programmes, group member meetings, national or regional participation events. (This list is an example only)
3. Whilst the Charity is not routinely engaged in face-to-face activities at this time as many meetings are held remotely with its beneficiaries and through third parties (those whose services are bought in to deliver welfare on our behalf), the Charity nevertheless must ensure that appropriate due diligence is carried out on these third parties, ensuring they have the appropriate systems of control in place, including adherence to adequate safeguarding policies and training and procedures.
4. The welfare and safety of the person at risk is paramount. All vulnerable people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse. Some of our beneficiaries and supporters are additionally at risk because of the impact of previous experiences, their level of dependency, communication needs or other issues.
5. The Charity takes all reasonable care to protect beneficiaries and supporters.

Legal Obligation

6. Safeguarding is a complicated affair and exists within a framework of both criminal and civil law. Legislation is supported by a body of statutory guidance. The Charity, as a voluntary organisation, must comply with Section 11 of the Children's Act 2004, specifically the legal framework in statutory guidance "Working Together To Safeguard Children 2015", and the Care Act 2014. It is also under a duty to ensure that anyone that provides a service on the Charity's behalf also complies with Section 11.
7. We will seek to fulfil our legal obligations (Legal Framework details in Annexe A) and commitment to proactively safeguard and promote the welfare of anyone within GamLEARN.
 - The production of a policy and procedures with a clear line of accountability, to which all will comply.
 - At Trustee Board level – the designated manager – to take leadership responsibility for the Charity's safeguarding arrangements; to act as the organisational interface with the Local Authority whenever a situation arises.



- A culture of listening to vulnerable adults and taking account of their wishes and feelings, both in individual decisions and the development of any support services.
- Clear whistleblowing procedures which are suitably referenced in staff training and codes of conduct.
- Arrangements which set out clearly the process for sharing information with other professionals and with the Local Safeguarding Adults Board (LASB).
- The safer recruitment for individuals whom the Charity will permit to work regularly with vulnerable adults, carrying out the appropriate level of Disclosure and Barring Service (DBS) checks, depending on their access to vulnerable adults.
- Appropriate supervision and support for staff, including undertaking safeguarding training.
- Ensuring the staff are competent to carry out their responsibilities for safeguarding.
- Clear policies in line with those from the LASB for dealing with allegations; responding without delay to concerns and complaints regarding actual or potential abuse, harm, or maltreatment.

8. This policy applies to all employees, Trustees, volunteers, and anyone working on behalf of GamLEARN.

Responsibility and Accountability

9. Trustees are overall responsible for safeguarding, even if certain aspects of the work are delegated to the Founder and employees on contract to the Charity. They should proactively safeguard and promote the wellbeing and welfare of the Charity's beneficiaries, staff and volunteers and others who come into contact with the Charity. This is a key governance priority.
10. The issue of safeguarding is subject to regular reviews at Trustee Board level and is reported on by exception at Board of Trustee's meetings. In addition, 'Safeguarding' will be reported upon in the Annual Report and Accounts. There will be a lead Safeguarding Trustee appointed.
11. The Charity's lead for safeguarding policy and management is Tracy 'O'Shaughnessy, supported by Sandra Adams (Trustee Safeguarding oversight). The Safeguarding Lead will report to Trustees.

Risk Assessments

12. Our Trustees have a duty to manage and to protect the reputation and assets of the Charity. It is therefore vital that Trustees assess the risks that arise from the Charity's activities and operations involving vulnerable adults and develop and put in place appropriate safeguarding

policies and procedures to protect them. They must also undertake on-going monitoring to ensure that these safeguards are being effectively implemented and practiced. This is critically important because charities may be targeted by people who abuse their position and privileges to gain access to vulnerable people, or their records, for inappropriate or illegal purposes.



13. Key Safeguarding risks for the Charity are:

- Potential abuse of vulnerable adults occurring during Charity activities, through failure to safeguard them.
- Potential abuse of vulnerable adults occurring during third-party organised activities, supported, or funded by GamLEARN.
- Ensuring that those who run activities that may include vulnerable beneficiaries have the expertise, knowledge, and skills to do so properly.
- Failure to deal with any incident responsibly, appropriately and in a timely manner.
- Failure to ensure Trustees are clear about their responsibilities for safeguarding.
- Failure to ensure that staff, Trustees, and volunteers coming into contact frequently with vulnerable adults are appropriately vetted.
- The reputational risk of damaging public trust and confidence in the charity through the occurrence of any alleged or actual incident.

14. The Charity seeks to manage effectively the risks associated with activities, events through teams:

- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating them, for any new activities or events involving or potentially involving vulnerable adults, and if changes are being made to activities or events involving or potentially involving vulnerable adults.
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis.
- Ensuring that the appropriate DBS or basic disclosure checks are conducted, depending on eligibility, for any individuals working with vulnerable adults.
- Requiring new employees and individuals working with vulnerable adults familiarise themselves with the content of this policy and the Code of Safer Working Practice.

Code of Safer Working Practice

15. The Code (at Annexe A) is provided for all those across the Charity to follow, in working and volunteering with vulnerable adults. The Code represents the behaviours which constitute safe working practice. As such it will assist those working with vulnerable adults to do so safely and responsibly, enabling each to monitor their own standards of integrity and good practice. The Code sets clear expectations of behaviour and codes of practice which serve to reduce the possibilities of positions of trust being abused or misused, or false accusations being made.

Partnering Organisations

16. We must exercise due diligence with our partnering organisations that deliver welfare services on our behalf and conduct face-to-face, in person visits to any of our beneficiaries.

17. With regards to engaging with other charities or organisations under contract to deliver service/provision/welfare support. It is the Charity's responsibility to ensure that each of these organisations provides assurances to the Charity that it has adequate safeguarding policies and



procedures in place. Also, that they are reviewed regularly, under which the quality of delivery would be subject to routine scrutiny, and that details of any safeguarding incident which might have impact on the Charity or its reputation are advised to us in a timely manner. Without such policies and procedures, the Charity will not engage or contract any organisation to deliver welfare services on our behalf.

Incident Reporting

18. Staff and volunteers and Trustees need to be aware of their responsibilities for reporting concerns in relation to safeguarding matters and the circumstances in which they should make a referral to the Local Authority or Police in necessary.
19. Safeguarding concerns about vulnerable adults and others who come into contact with the Charity will be diligently and promptly responded to, recognising the sensitivity it may hold for those involved. Where there is a concern, this should be reported to the appropriate person (Tracy O' Shaughnessy) immediately where possible, but at least within 24 hours, to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken because of investigations, which may include contacting the police and or fulfilling legal duty to refer information to the DBS and or the Local Safeguarding Adults Board (LSAB) as required. Not all concerns justify a notification to the LA but MUST still be recorded.
20. The Trustees acknowledge their duties to make a Serious Incident report to the Charity Commission and other relevant bodies if:
 - There has been an incident where someone has been abused or mistreated (alleged or actual) and this relates to the activities of the Charity.
 - Beneficiaries of the Charity have been, or are alleged to have been, abused or mistreated while under the care of the Charity, or by someone connected with the Charity, for example a Trustee, staff member or volunteer: or
 - There has been a breach of both procedures or policies at the Charity which has put beneficiaries at risk, including failure to carry out checks which would have identified that person is disqualified under safeguarding legislation, from working with adults.

Safer Recruitment

21. Although most of the Charity's activities do not involve contact with children or working in 'regulated activity' with adults at risk, the Charity has a responsibility to ensure the suitability of those Trustees, employees (self – employed) and volunteers who may work with, or encounter adults at risk.
22. The Charity's recruitment process as well as the quality of our employment contract are critical to our approach to safeguarding; they must be sufficiently robust, rigorous and appropriately reviewed. Although, as previously stated, the Charity does not generally engage in 'regulated' activity with children or vulnerable adults, the Charity Commission recommends that Trustees always obtain a DBS check when they can, as it is an important tool in ensuring that the person is suitable to act. Any requirement for a DBS check is out in the job advert (if applicable). Given the usual nature of activity by the Charity, there is no current requirement



23. The Charity's priority staff posts requiring DBS checks are:

- Trustees and those in a Safeguarding role or Financial role
- Lead Safeguarding Officer

Facilitators of programmes

24. The Charity utilises the Disclosure Service to provide DBS checks of the appropriate level on staff, volunteers, and Trustees. Due to the Data Protection Act the Charity will rely on the Human Resources agency to ask to see any applicants/staff members DBS certificate and or number.

25. As part of recruitment good practice, the Charity will also make other checks, as undertaking DBS checks is not enough on its own; for example, taking up two written references for successful candidates, which will be checked, challenging employment gaps, declaring unspent relevant convictions, as part of the recruitment process.

Training

26. Training will be provided for conducting risk assessment in relation working with vulnerable adults. This will be identified as appropriate in advance by the Trustees and supplied to all staff, volunteers and others where required.

27. All members of GamLEARN must be made aware of this policy and given the opportunity to read it during their induction period, together with sight of the Government leaflet "What to do if you're worried that a child or vulnerable person is being abused" – Guide for Practitioners 2015.

28. Critical to training outcomes is that staff should always know to whom they report concerns.

Related Policies

29. This policy should be read in conjunction with the following Charity policies and procedures:

- Data Protection Policy
- Equal Opportunities Policy
- Health & Safety Policy
- Whistleblowing Policy
- Serious Incident Reporting Policy

Policy Review

30. This policy will be reviewed by the Designated lead annually and the refreshed version presented to the board of Trustees for review.



ANNEX A
To Safeguarding Policy
GamLEARN Safeguarding Policy
Legal Framework

The Charity's Safeguarding has been drawn up based on law and guidance that seeks to protect vulnerable people:

- Data Protection Act 1998, superseded 2018
- Sexual Offences Act 2003
- Charities Act 2011
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- Care Act 2014
- Charity Commission Guidance: 'How to protect vulnerable people' and 'Strategy for dealing with Safeguarding issues in Charities'

The primary legislation covering safeguarding for adults is the Care Act 2014



ANNEX B
To Safeguarding Policy
GamLEARN – Safeguarding Policy
Code of Safer Working Practice

Members of staff, volunteers and Trustees should:

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
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- Treat all vulnerable adults with respect and dignity, keeping your own language, attitude, and body language respectful.
- Actively communicate with vulnerable adults and where possible involve them in planning and running of activities.
- Develop a culture where staff and vulnerable adults feel comfortable with each other to point out inappropriate attitudes and behaviour in each other.
- Make it plain to whom someone can speak to about a personal concern and be proactive in addressing concerns and allegations.
- Keep physical contact specific to the needs of the activity and always seek permission from the person(s) first.
- Never use rough play, sexually provocative words and games or any forms of physical punishment.
- Never scapegoat, ridicule or reject a person, or allow others to do so.
- Obtain consent for any photographs/videos to be taken, shown or displayed.
- Remember that inappropriate behaviour can also occur over the telephone, email, social media, or internet – communication through social media should only be on public pages and avoid colloquial language/abbreviations which may be misinterpreted e.g., LOL. **(During Covid 19 restrictions, contact is made using a platform such as Microsoft Teams. Set out the specific 'rules' in terms of this policy and understand how mutual respect of everyone in the group is necessary for safeguarding reasons.)**
- Report incidents of alleged abuse



ANNEX C

To Safeguarding Policy

GamLEARN – Safeguarding Policy

Safeguarding Representative

- Tracy O'Shaughnessy is the appointed Designated Safeguarding Lead (DSL) who will monitor and evaluate all Safeguarding practices within GamLEARN and ensure the organisation is kept up to date with evolving safeguarding practice or legislative change and providing the main reference for advising and co-ordinating safeguarding cases.
- Sandra Adams (Trustee) is the Safeguarding representative on the Board of Trustees.

Role of The Designated Safeguarding Lead (DSL)

The DSL is ultimately responsible for the implementing of the GamLEARN Safeguarding Policy. Specifically, they will ensure:

- All central records are held and maintained electronically, and written copies of documents are stored securely only where this is deemed appropriate, adhering to GDPR.
- All employees and volunteers will have undergone a full Disclosure and Barring Service (DBS) and any other necessary checks completed.
- All employees and volunteers are aware of their responsibility for Safeguarding within this policy and know who the Safeguarding contacts are within GamLEARN.
- Complete a review of the Safeguarding policy to ensure all policy is up to date and accurate and report to the Trustees Board annually.
- All employees or volunteers receive Safeguard training in line with GamLEARN expectation.
- Ensuring that staff and volunteers can discuss safeguarding and any self-harm/suicide issues confidentially and receive guidance and support if situations arise.
- Ensuring that safeguarding implications are constantly reviewed across the scope of the service that GamLEARN delivers to adults and that these are fully considered in the development of all new projects.
- Ensuring this policy is fully integrated into the GamLEARN annual Risk Assessment.

Role of the Safeguarding Trustee

The Trustee will ensure:

- The lead keeps the board informed where appropriate of the any cases and actions taken whilst adhering the GDP regulations.
- Monitors the record keeping and vetting of all staff or volunteers within GamLEARN



- Ensures Trustees are aware of their responsibility regarding Safeguarding within GamLEARN
- Ensures the Policy is actively followed and shared with all members of GamLEARN.

Annex D

GamLEARN – Safeguarding Policy

Guidelines for GamLEARN Representatives

GamLEARN manages two principle safeguarding risks:

- Risks to vulnerable adults who may be affected by gambling related harm and
- Risks to vulnerable adults from staff or volunteers who wish to cause these people harm. GamLEARN does not work directly unsupervised with young people under the age of 18 years.

Arrangements for managing safeguarding and the reporting of potential issues.

Importance of raising concerns.

Everyone working within GamLEARN can play an important part in promoting the safety and wellbeing of people with whom they are working. It is not the responsibility of anyone working within GamLEARN, in a paid or voluntary capacity to decide whether a young person may be at risk. It is therefore vital that staff and volunteers raise all concerns of suspicions in line with the procedures as outlined below:

What to do if a person tells you they are self-harming or having suicidal thoughts

The following are guidelines on immediate action to be taken following a report of self-harm or similar:

- React calmly.
- Reassure the person that you are glad they have told you, and it is not their fault.
- Do not promise to keep it to yourself, at the earliest opportunity remind the person that you will have to pass this information on to somebody trusted to support the person in the best way possible (normally the GamLEARN Safeguarding Lead)
- Allow the person to explain how they feel.
- It is important to clarify what you have heard and to establish the basic facts. However, avoid asking leading questions and do not ask the person specific questions about explicit details.
- If possible, make brief notes during the initial disclosure, explaining to the person why you are doing this. If not possible to do at the time, make notes as soon as possible afterwards.
- If the person is unaware of the type of support and help GamLEARN can give, talk to them about it and provide information on GamLEARN and any relevant gambling helplines as appropriate.

Your information recording should include as far as is possible:

- The nature of the disclosure (i.e., self-harm, potential suicide).
- A description of any visible injury



- Dates and times and any other factual information (being careful to distinguish between fact and opinion and hearsay)

Staff and volunteers should not attempt to investigate any disclosure, suspicion, or allegation beyond the gathering of information as outlined above.

Inform the Tracy O'Shaughnessy (Safeguarding Lead) immediately of your conversation by calling the mobile number as listed on the sheet below. If the Founder is uncontactable, call the Lead Safeguarding Trustee. In an emergency if there is immediate risk of danger to a person call 999.

Other agencies to share with the person are:

- Samaritans - 116 123
- Crisis line - 0800 731 2864

Action where a report or suspicion of abuse is made concerning a paid member of staff or volunteer.

In the unlikely event that a person reports inappropriate behaviour towards them or another person from a member of staff, it is important that you raise this with the lead immediately, who will inform the Board of Trustees.

If the allegation concerns the lead, then the Chairman of GamLEARN must be notified immediately.

If the allegation concerns the Chairman of GamLEARN, then the lead must be notified immediately.

Contact Details:

Safeguarding Lead:

Tracy O'Shaughnessy – Tracy@GamLEARN.org.uk

Safeguarding Trustee

Sandra Adams – sla41@hotmail.co.uk

Selection and Recruitment of staff and volunteers to work with GamLEARN

GamLEARN recognises that anyone may have the potential to abuse a young or vulnerable person in some way and therefore all reasonable steps are taken to ensure that unsuitable individuals are prevented from working or volunteering within GamLEARN.

All prospective staff and volunteers must be vetted through the Disclosure and Barring Service (DBS) and undergo an Enhanced disclosure and be registered for the DBS subscription service.

All prospective staff and volunteers must fulfil the following requirements to be able to work within GamLEARN:

- Have 'lived' experience of gambling related harm
- Must be an active GamLEARN member.
- Must allow GamLEARN to contact two independent referees and two written references must be provided, on official headed paper. Authenticity of the reference must also be validated by speaking to the person who provided the reference and calling the telephone number as listed on the headed notepaper.
- Must attend appropriate Safeguarding training as provided by GamLEARN, at least annually.

