



SAFEGUARDING CHILDREN & YOUNG PEOPLE POLICY & PROCEDURES

Quay Climbing Centre Clip 'n Climb Exeter Boulder Exe

Designated Safeguarding Officer: Jennifer Thomas
Management Safeguarding Lead: Gavin Atkins
Director Responsible for Safeguarding: Alison Smith

VERSION 2.1 – 15 October 2025



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SAFEGUARDING CHILDREN & YOUNG PEOPLE POLICY & GUIDELINES

Introduction & Key Principles

The Quay Climbing Centre Group's Safeguarding Children & Young People Policy is underpinned by the following principles laid out in the NSPCC CPSU Standards 2016:

- **Welfare First** - children and young people have a right to enjoy sport, free from all forms of abuse, exploitation and poor practice.
- **Inclusion** - all children and young people have equal rights to protection from harm. All children and young people should be encouraged to fulfil their potential, and inequalities should be challenged
- **Responsibility** - everyone has a responsibility to support the care and protection of children. We all have a duty of care to children and young people who take part in sporting activities within our centres and/or led by our instructors and employees in any setting where the activity is delivered.
- **Partnership** – we work with statutory agencies, local safeguarding partnerships and our sport governing bodies.
- **Transparency** – we maintain clear reporting procedures and open communication so that everyone understands what is expected of them and how to respond to a safeguarding incident.

It is mandatory for all employees and volunteers working for The Quay Climbing Group to comply with the group's Safeguarding Children and Young People Policy and Procedures and Codes of Practice.

“Everyone who takes part in sport has the right to participate in an enjoyable and safe environment. Sports organisations have a duty of care to safeguard children and young people and protect them from harm.” NSPCC CPSU

Legal Framework

This safeguarding policy is underpinned by the legal duties and statutory guidance that apply to all organisations working with children and young people in England.

Our responsibilities are defined by the following legislation:

- **Children Act 1989** – establishes the duty to safeguard and promote the welfare of children, including the duty of local authorities to investigate where there is reasonable cause to suspect significant harm.

- **Children Act 2004** – builds on the 1989 Act and places a duty (Section 11) on a range of organisations, including those providing sports activities, to ensure their functions are carried out with regard to the need to safeguard and promote the welfare of children.
- **Children and Social Work Act 2017** – introduced the system of local multi-agency safeguarding partnerships, replacing Local Safeguarding Children Boards.
- **Safeguarding Vulnerable Groups Act 2006** – establishes the legal framework for safer recruitment and the barring of unsuitable individuals from working with children.
- **Working Together to Safeguard Children (2023)** – statutory guidance on multi-agency working to safeguard and promote the welfare of children.
- **Equality Act 2010** – requires us to provide safeguarding and welfare without discrimination and with due regard to the needs of children with protected characteristics.

We will adopt best practice guidelines set out by industry bodies and our sport governing bodies including:

- **Child Protection in Sport Unit (CPSU – NSPCC)**: the leading reference point for safeguarding in sport.
- The **British Mountaineering Council (BMC)** and **Association of British Climbing Walls (ABC)**.

“Safeguarding is everyone’s responsibility. All employees, volunteers, participants and parents share this commitment.”

All employees, coaches, volunteers, participants, parents and directors are expected to understand these duties and ensure that their practice, conduct, and decision-making reflect the requirements set out in this statutory framework.

Policy Scope

This policy and associated guidelines/Codes of Conduct apply to:

- All activities provided by the Quay Climbing Group (company name Quay Climbing Centre Ltd) including activities delivered at Quay Climbing, Clip ‘n Climb Exeter and Boulder Exe **and** activities delivered by employees of Quay Climbing that take place in external venues including, but not limited to, outdoor climbing sessions, training and attendance at competitions and events.
- All employees, coaches and volunteers working for the Quay Climbing Group
- Children and young people aged 18 or under participating in activities delivered by The Quay Climbing Group

- Young people aged 18 and under who are employed by the Quay Climbing Centre
- Parents, carers and visitors to our centres and activities.

Associated Policies

The following codes and policies are referenced in the Safeguarding Policy and provide guidance or govern practices that form part of our wider Safeguarding approach:

- Whistleblowing Policy (included within this policy)
- Safer Recruitment Policy
- Codes of Conduct for coaches/instructors, parents and participants
- Anti Bullying Policy
- Online Safety/Social Media Policy
- Filming and Photography Policy
- Employee Handbook

Company Addresses/Locations

Company Registered Address:

Quay Climbing Centre Ltd, Haven Road, Exeter, EX2 8AX

Company Locations/Centres:

Quay Climbing Centre – Haven Road, Exeter, EX2 8AX

Clip 'n Climb Exeter – Haven Road, Exeter, EX2 8AX

Boulder Exe – Tudor Street, Exeter, EX4 3BR


Monitoring

This policy will be reviewed every two years, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by regulatory or governing bodies (such as the BMC or ABC)
- as a result of any other significant change or event.

This policy was last reviewed on 11 / 13 / 2025 [Date]

Managing Director:

Signed 

Damian Johnson

Director with Responsibility for Safeguarding:

Signed 

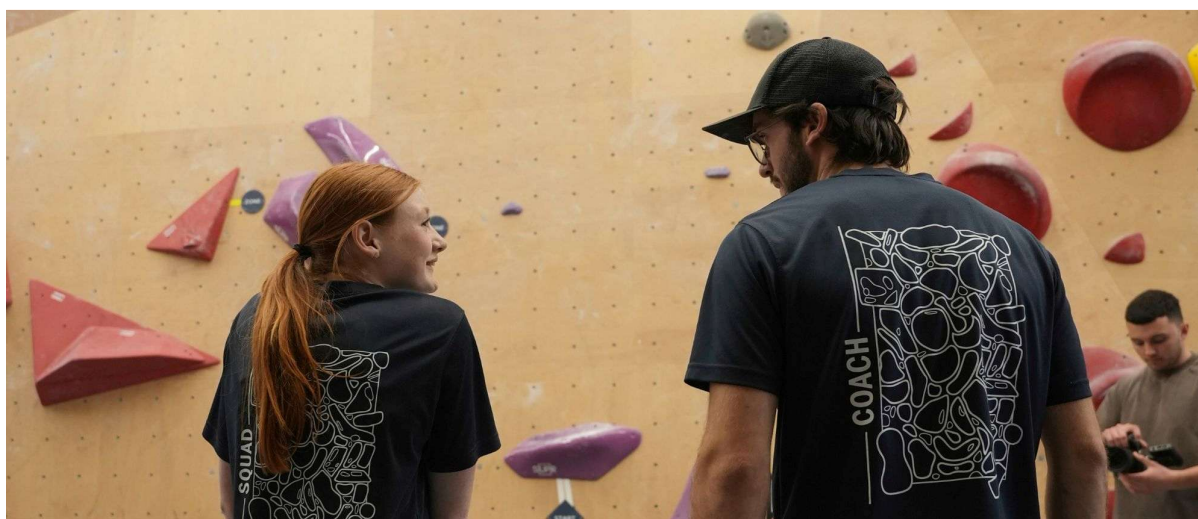
Alison Smith

SAFEGUARDING POLICY STATEMENT

Note: The terms 'child', 'children' and 'young person' describe any person under the age of 18 and may be used interchangeably in this document.

Our Statement

Our organisation acknowledges its duty of care to safeguard and promote the welfare of children and young people. It is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with with any requirements laid out by the British Mountaineering Council (BMC) and Association of British Climbing Walls (ABC).



The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background, all children:

- have a positive, safe and enjoyable experience at centres operated by The Quay Climbing Centre Ltd
- can undertake activities in a safe and child-centred environment
- are protected from abuse whilst participating in climbing and bouldering activities delivered by The Quay Climbing Centre

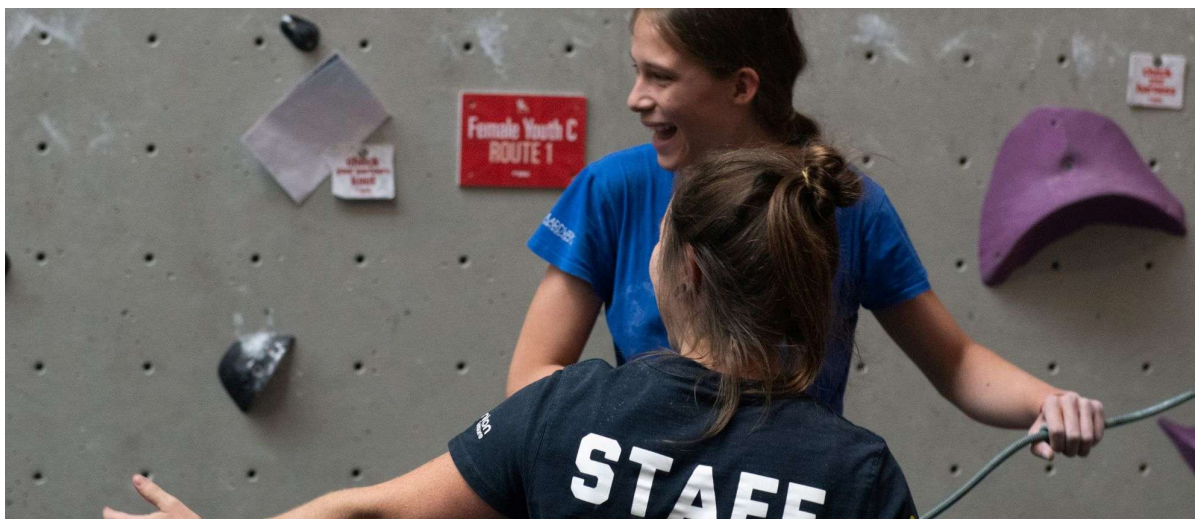
We acknowledge that some children, including deaf and disabled children or those from Black, Asian and minoritised ethnic communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

Our Policy: What We Will Do

As part of our safeguarding policy we will:

- promote and prioritise the safety and wellbeing of children and young people whilst in the care and responsibility of The Quay Climbing Group.
- value, listen to and respect children and young people
- ensure robust safeguarding arrangements and procedures are in operation and that a safeguarding culture is embedded across the company.
- adopt safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
- provide effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about our policies, procedures and behaviour codes and follow them confidently and competently
- ensure that our venues and activities are appropriately risk assessed in line with industry best practice and our own **Standard Operating Procedures**, considering the needs of all users, including children and young people
- ensure that there are clear **Codes of Conduct** in place for the delivery of activities, for the young people taking part in regular activities (such as Coaching, Clubs or Squads) and for the parents/carers of those children.
- ensure appropriate action is taken in the event of all incidents or concerns, from lower-level concerns and poor practice to more serious abuse and that a clear **Anti Bullying Policy** is in place and implemented.
- provide support to the individual(s) who raise or report the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- ensure that escalation routes to the Designated Safeguarding Lead and to statutory agencies and/or industry bodies are understood and clearly communicated
- ensure that a **Whistleblowing Policy** is in place to support employees, volunteers or participants to safely raise concerns
- record and store information securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office]

- prevent the employment or deployment of unsuitable individuals by recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made in line with a clear **Safer Recruitment Policy**
- ensure that the welfare of young people who volunteer or work for the Quay is safeguarded as part of our **Safer Recruitment Policy**
- appoint a nominated **Designated Safeguarding Officer (DSO)** for children and young people (who will typically be someone who is not a director of the company or Centre Manager/Director), a deputy who will typically be the Centre Director and a lead director/board member for safeguarding (who will typically be one of the company owners).
- develop and implement an effective **Online Safety/Social Media Policy** and related procedures
- ensure that there are clear **Guidelines for the Use of Photography/Filming**
- share information about safeguarding and good practice with all users of our centres through posters and availability of information on our websites and in specific activity information (for example Youth Club and Youth Squad documentation)
- make sure that children, young people and their parents know where to go for help if they have a concern



The policy and procedures will be widely promoted and are mandatory for everyone involved in The Quay Climbing Centre Group. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal or exclusion from the organisation.

RECOGNISING HOW CHILDREN & YOUNG PEOPLE CAN BE HARMED

What is Child Maltreatment?

Maltreatment is a term used to describe the ways in which children are harmed – it encompasses all forms of ill-treatment, abuse, neglect and exploitation.

Maltreatment may result from action or inaction by a volunteer, employee, family member/person known to the young person, member of the public or another young person. Abuse is where a child is treated cruelly, violently or forcefully by an adult or another child. Abuse is a form of maltreatment. The Children Act (1989) states there are four main types of abuse, outlined below:

Physical Abuse

Where adults physically hurt or injure children. In a climbing situation this might occur if the child is forced to train or climb beyond his or her capabilities. It may also occur if the training disregards the capacities of the child's immature and growing body. In more extreme cases this can take the form of physical attack i.e. hitting, shaking, burning or biting them.

Emotional Abuse

Occurs when a child is not given love, help and encouragement or is subjected to threats, humiliation, bullying or lack of affection. It can, conversely, also occur if a child is over protected, preventing them from participation in socialising. In a sporting/climbing context this may be present in the unrealistic expectations of what a child can achieve by parents, coaches or even fellow climbers. This can also occur in the undermining of a young person through humiliation. This abuse often manifests itself in the form of bullying (see section What Is Bullying for further details).

Sexual Abuse

Occurs when a child knowingly or unknowingly takes part in an activity which meets the sexual needs of the adult(s) involved. It could range from sexually suggestive comments to physical sexual activities. Exposing young people to pornography is also a form of sexual abuse. In a sporting context this may take the form of photography or videoing for the sexual gratification of the viewer. Coaches and volunteers are often placed in a position of great trust, and it is when this trust is abused that sexual abuse can occur.

Neglect

This includes situations in which adults fail to meet a child's basic physical needs (e.g. food, hygiene, medical care). This may involve the lack of medical attention or

consistently leaving children alone and unsupervised or monitored. Neglect can also occur if a supervisor fails to ensure children are safe or exposes them to undue risk of injury.

There are additional forms of maltreatment that may present safeguarding or child protection issues, including Exploitation and Bullying. All stakeholders should be aware of the way in which the following issues may impact young people:

Exploitation

Where a child or young person is manipulated, coerced or deceived into activities for someone else's gain. This can include **Child Sexual Exploitation (CSE)** where children are groomed coerced into sexual activity in exchange for things such as gifts, money, drugs or affection. Children may be deceived into believing they are in a loving relationship making the abuse harder to recognise. It can also include **Children Criminal Exploitation (CCE)** where a child is forced or coerced into criminal activities, such as drug trafficking or carrying weapons. This often involves organised criminal gangs and can include practices like 'county lines', where children are exploited to move drugs across regions. Exploitation can occur online or offline, and may involve grooming, threats, or violence. It often involves a power imbalance, where the child is made to feel dependent or fearful. The effects can be long-lasting, impacting the child's emotional, physical, and social well-being.

Modern Slavery is a type of abuse that is more likely to be associated with adults, but children can also be victims of modern slavery. It encompasses slavery, human trafficking, forced labour and domestic servitude. It is often linked to exploitation, such as CSE and CCE.

Child Trafficking is when children are recruited, moved or transported and then exploited, forced to work or sold. It is important to note that trafficking is not about distance, a child can be trafficked from one street to another.

Radicalisation and Extremism

Radicalisation is the process by which someone comes to believe or support extremist ideologies that are associated with terrorist groups. Extreme views can be political, religious or ideological. In some cases, radicalisation can lead to involvement in these groups and/or terrorist acts.

So Called 'Honour Based' Abuse

A crime of incident committed to protect or defend the 'honour' of a family or community. Examples include **Female Genital Mutilation (FGM)** which is a criminal

offence in the UK and **Breast Ironing** which is considered a form of child abuse in the UK.

Forced Marriage

In a forced marriage, one or more of the people do not or cannot consent to the marriage (due to age or disability), duress may have been used, and coercive action may have been used to force the marriage. It is illegal for 16 and 17 year olds (and anyone under 16) to marry in England and Wales, even with parental consent.

Online Abuse

Any type of abuse that happens over the internet or a mobile network. For example, exposure to harmful content or experience of bullying or grooming. Online abuse may be committed by people the child knows (including other children) or by strangers. It can occur alongside offline abuse.

Domestic Abuse

Domestic abuse is where a child sees, hears or experiences the impact of abuse in their own home. It can be an isolated event or a pattern of incidents. A child might also experience domestic abuse in their own relationships (often known as teenage relationship abuse.).

Child on Child Abuse

Child on child abuse is where children abuse other children. It can also be referred to as peer on peer abuse. It can involve bullying, physical abuse, sexual violence or harassment and may take place directly or online. Initiation or hazing are both forms of abuse involving humiliation or harassment of a child in a group.

Bullying

Bullying behaviour is unwanted, aggressive behaviour which involves a real or perceived power imbalance. The behaviour is often repeated or has the potential to be over time. It is one of the most common forms of abuse and is something that must be taken seriously – the consequences of bullying can be devastating to both the victim and their family. Bullying can take many forms but typically falls into one of the following categories:

- Physical – such as hitting, pushing, kicking or theft of property
- Verbal – such as remarks that are offensive in nature, often personal and often in contravention of protected characteristics
- Emotional – such as persistent negative feedback or manipulation
- Exclusion – deliberately leaving someone out of an activity or a group
- Extortion – blackmailing, being dared or forced to steal, demands

- Damage to property – hiding or defacing property, kit, devices
- Cyber bullying – bullying through social media, messaging, spreading rumours, posting derogatory comments
- Prejudice based bullying – gendered, homophobic, transphobic or racist behaviours or name calling

Bullying behaviour may be direct such as violence, torment, ridicule, taunting or persistent teasing. It may also be undertaken indirectly through online tools such as the posting of unacceptable comments, posts or images through social media sites.

Within sport and climbing there is the potential for bullying to take place where:

- A child is pushed too hard in training by a parent or coach without due respect to physical and emotional wellbeing
- A coach adopts a ‘win at all costs’ philosophy or places unwarranted pressure on a young climber
- Climbers intimidate their peers – peer on peer bullying
- Climbers feel pressurised by peers or coaches to do routes that are too hard for them or beyond their scope

Bullying is not tolerated by The Quay Climbing Group. Our **Anti Bullying Policy** sets out what we will do to tackle bullying and how we will support young people and their families. It is mandatory for all employees of the Quay Climbing Group to adhere to the guidelines set out in this policy.

Abuse, in all its forms, can affect children and young people at any age. It can have serious and long-lasting effects on their physical, emotional, and social well-being. If abuse is not recognised and addressed appropriately, its impact may continue into adulthood.

The Quay Climbing Group is committed to ensuring that all children and young people are protected from harm and that any concerns are responded to promptly and effectively. This applies to children and young people participating in our activities and under 18 year olds who are employed by the company.

Possible Signs of Abuse

It is not always easy to recognise a situation where abuse is occurring or has already occurred. The Quay Climbing Group acknowledges that its employees and volunteers are **not necessarily experts at such recognition**. The Quay Climbing

Group therefore expects them to discuss any concerns they may have with regards to the welfare of a child or young person with the **Designated Safeguarding Officer or, in their absence, the Management Safeguarding Lead**

“It is NOT the responsibility of those involved in The Quay’s activities to decide whether abuse is occurring, but it is their responsibility to act upon any concerns.”

Some children or young people may have additional vulnerabilities and may face additional barriers or difficulties in communicating any concerns of problems because of their race, gender, age abilities, religion, sexual orientation or political persuasion. Adults need to recognise this and be particularly sensitive should concerns be raised by such children or in relation to them.

Below are listed some of the characteristics which may be evidence of abuse. These are by no means exhaustive and are only indicators of potential abuse, **not** confirmation that abuse is taking place.

- Unexplained or suspicious injuries such as bruising, cuts or burns, particular if situated on a part of the body not normally prone to injury
- Unexplained changes in behaviour: withdrawal, aggression, anxiety
- Distrust or fear of certain adults, for example those with whom a close relationship would normally be expected
- Disclosure of abuse or concerning comments
- Inappropriate sexual awareness
- Displaying variation in eating patterns, including overeating or loss of appetite
- Difficulty making friends and/or a child being prevented from socialising with other children
- Poor hygiene or inappropriate clothing

HOW TO RESPOND TO A DISCLOSURE, SUSPICION OR ALLEGATION

Be Vigilant and Aware of the Possibility of Abuse

It is understandable that people who are well motivated and committed to climbing find it hard to believe that children may be suffering harm in a climbing environment or at home. However, you should be vigilant and open to the possibility that abuse may be occurring. If a young person behaves in a way that gives rise to concern, this may be an indicator of a problem. There may be an acceptable explanation for this behaviour, but it is better to act on concerns rather than ignore them.

You should also be aware of attitudes of employees and volunteers and of the interactions between them. There is no place for complacency or acceptance of behaviours that indicate a poor safeguarding culture or, worse, damaging practice (for example excusing or normalising behaviours “they are always like that”). Failure to report condones poor practice.

“If you become aware of anything that makes you concerned you should raise it – to the Designated Safeguarding Officer.”

If You Receive a Disclosure or Witness Abuse/Poor Practice

If you receive a disclosure or witness abuse/poor practice it is important that you act upon it. You may see something in your day to day work at the company, you may be told something by a young person or colleague, or you may be present at a time when abuse occurs. Allegations of abuse may be made a long time after the event (for example by an adult who was abused as a child or by a young person who reports something that occurred some time ago).

The Quay Climbing Group has adopted the ABC Safeguarding Guidelines and flowchart to determine the course of action you should take if you become aware of anything of concern. Your first line of advice is the Designated Safeguarding Officer. In the event that the concern relates to the Designated Safeguarding Officer you should speak to the Director with Responsibility for Safeguarding or contact the ABC Safeguarding Team or the NSPCC as external agencies with the experience to advise in these situations.

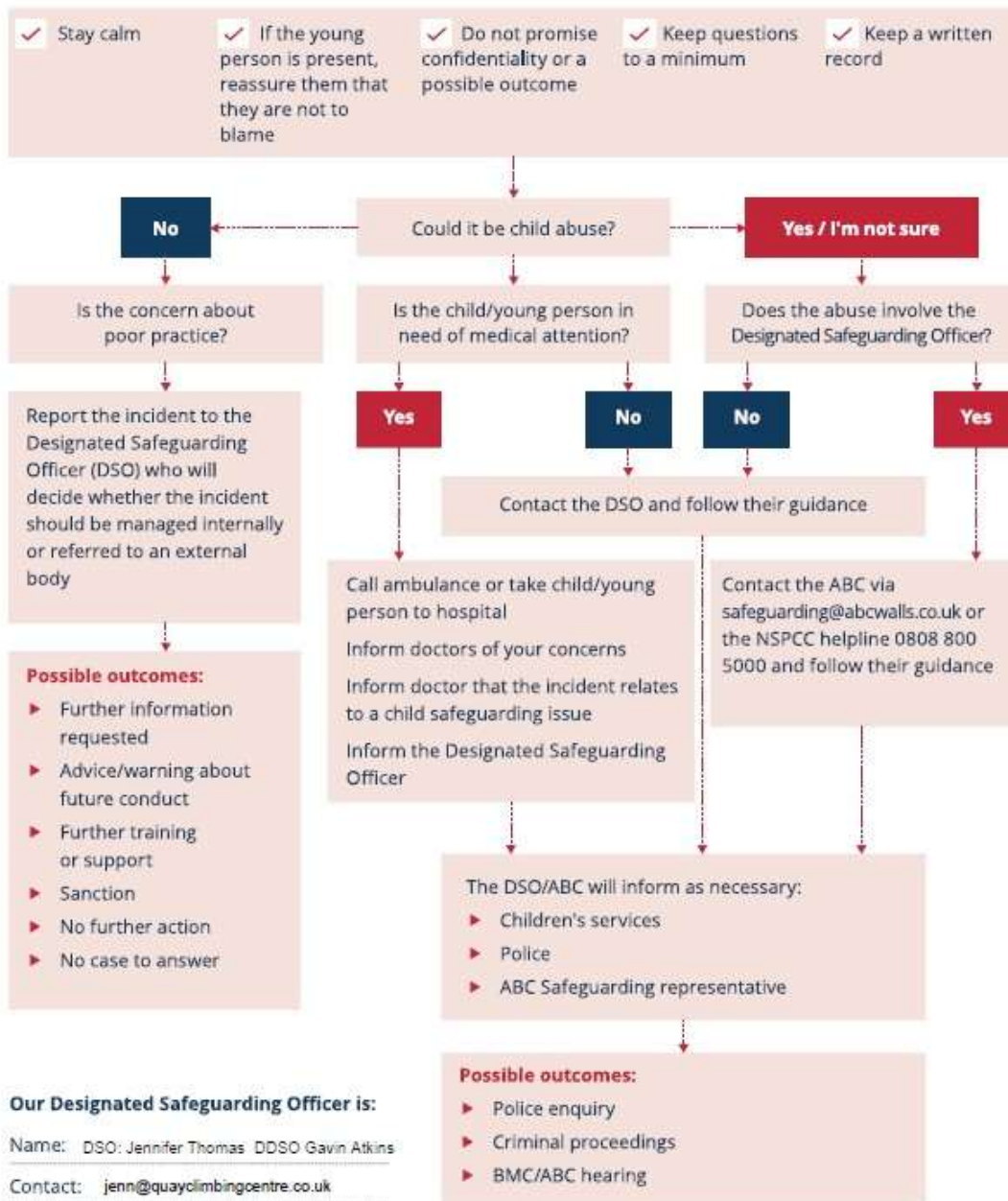
What to Do – Decision Tree and Guidance

This decision tree applies regardless of where the disclosure or incident takes place. Ensure that emergency services are contacted if the young person requires medical treatment or is in immediate danger.

SAFEGUARDING PROCESS



This flow chart illustrates the appropriate process to follow when dealing with concerns, disclosure, or allegations about staff, coaches, or volunteers



Key Safeguarding Contacts

| Quay Climbing Group Safeguarding Contacts | |
|---|--|
| Designated Safeguarding Officer | Jennifer Thomas jenn@quayclimbingcentre.co.uk t. 01392 426 850 |
| Deputy Designated Safeguarding Officer/Management Lead for Safeguarding | Gavin Atkins gavin@quayclimbingcentre.co.uk t. 01392 426 850 |
| Director Responsible for Safeguarding & Governance | Alison Smith alison@quayclimbingcentre.co.uk t. 07795 652 788 |

| Safeguarding Support Contacts – Industry and NSPCC | |
|---|--|
| Association of British Climbing Walls (ABC) Safeguarding Advice | safeguarding@abcwalls.co.uk |
| British Mountaineering Council (BMC)/GB Climbing Safeguarding | safeguarding@thebmc.co.uk |
| NSPCC Safeguarding Helpline | help@NSPCC.org.uk t. 0808 800 5000 |
| Childline Helpline | t. 0800 1111 |

| Police and Devon Safeguarding Agencies | |
|--|--|
| Emergency Services | Dial 999 – where there is immediate risk of harm or need for medical attention |
| Children’s Front Door/MASH (Devon Multi-Agency Safeguarding Hub) – for concerns about the welfare of a child | Emergency concerns: 0345 155 1071 Consultation: 01392 388 428 mashsecure@devon.gov.uk |
| LADO (Local Authority Designated Officer) – for allegations against an adult who works with children | ladosecure-mailbox@devon.gov.uk t. 01392 384 964 |
| Children’s Social Care Emergency Duty Team (out of hours team) | t. 0845 6000 388 |
| Devon Safeguarding Partnership | devonscp.org.uk |

| Useful Websites | |
|---------------------------------------|--|
| Child Protection in Sport (CPSU) | thecpsu.org.uk |
| Childline | childline.org.uk |
| Association of British Climbing Walls | abcwalls.co.uk |
| Protect (Whistleblowing Advice) | protect-advice.org.uk |

RECORDING INFORMATION

For Employees Or Volunteers Reporting A Disclosure Or Concern

In all cases it is important that you record what you have seen or been told using **The Quay Climbing Safeguarding Incident Form (on Deputy and in the Safeguarding Folder at all centres)**. This form will be used to share information and may be passed to other agencies involved in safeguarding children (such as the police, social services, medical professionals, industry safeguarding bodies). Any form of abuse can ultimately result in a criminal conviction. It is important that you keep an open mind and that any allegations are kept in the strictest confidence.

In the event of any reportable situation use the ABC Flowchart to guide you always remembering the 5 key principles:

- stay calm
- reassure the young person that they are not to blame
- do not promise confidentiality or an outcome
- keep questions to a minimum and do not ask leading questions
- record everything accurately, in the words of the person making the disclosure and immediately upon receiving the allegation/experiencing a concern

If the young person is in immediate danger or requires medical attention call 999.

Send the Incident Form to the Designated Safeguarding Officer.

“Remember, it is not your responsibility to resolve the situation. The DSO will provide guidance and will consult professional bodies as appropriate.”

For Stakeholders (Parents/Carers/Young People) Reporting A Concern

Please contact the Designated Safeguarding Officer or Management Lead for Safeguarding who will complete the Incident Form with you.

Where The Concern Relates To The Designated Safeguarding Officer Or Management Lead For Safeguarding.

In the event that your concern relates to the Safeguarding Team at the Quay Climbing Group please contact the Director Responsible for Safeguarding or report directly to the ABC safeguarding help desk for advice and guidance.

“If you are in any doubt or do not feel sharing your concerns with a Director or member of the team at Quay Climbing, please refer to our Whistleblowing Policy which is designed to support you to raise concerns independently. You may also seek guidance from the NSPCC 24 hour helpline 0808 800 5000 or the ABC Safeguarding Team.”

Where the concern is relates to an employee, contractor or volunteer working for or with the Quay Group, they will be notified that an allegation has been made and what will happen next, including whether they will be suspended from their duties pending investigation.

GDPR: CONFIDENTIALITY AND STORAGE OF INFORMATION

Information recorded relating to allegations will be held confidentiality and stored securely by the Quay Climbing Group. Records will be stored securely, in locked, non-portable filing cabinets with access limited to the Designated Safeguarding Officer, Management Safeguarding Lead and Director with responsibility for Safeguarding. In the event that the allegation involves a member of the Safeguarding Team, the ABC or the NSPCC are the professional bodies who will advise how to handle information recorded.

All safeguarding records are to be kept for at least 10 years or until the young person reaches the age of 25 (whichever is the longest).

CODES OF CONDUCT & GOOD PRACTICE

The Obligation Of Quay Climbing Group

The Quay Climbing Group accepts responsibility for the implementation of this Safeguarding Policy.

The Designated Safeguarding Officer will be the key report for any concerns relating to Safeguarding. The Director responsible for Safeguarding and the Management Lead for Safeguarding will work with the DSO to ensure appropriate governance of safeguarding and training for stakeholders including:

- Publication and communication of the Safeguarding Policy to all employees and stakeholders alongside associated policies (Anti Bullying, Whistleblowing, Online Safety and Photography)
- Reviewing the policy every 2 years or when guidance changes
- Communicating to centre users and parents/carers our safeguarding policy and approach
- Ensuring safer recruitment practice including Disclosure and Barring Enhanced Service checks (DBS checks) for adults who meet our thresholds and work with young people on a regular basis.
- Providing guidance and training to all employees working with young people and ensuring appropriate moderation processes are in place to enable ongoing CPD and development



Codes Of Conduct For All Stakeholders

The Quay Climbing Group has adopted Codes of Conduct for all stakeholders involved in the provision or participation in coaching, instruction and activities provided by the Group. These codes outline expectations of, and commitments to, the stakeholders involved in our activities. They are designed to ensure that young people are safe from harm and can climb in a positive and supportive environment.

The following Codes of Conduct are provided to all participants in our youth activities and available to view in our centres:

- **Code of Conduct for Coaches/Instructors** – provided to all employees and volunteers working with young people and/or working for our business
- **Code of Conduct for Young People** – age appropriate codes have been developed for participants in our clubs ranging from those attending clubs for younger children (primary age) to clubs aimed at teenagers and those climbers invited to join our Squad Programmes
- **Codes of Conduct for Parents/Carers** of young people attending clubs/squads

Understanding Positions of Trust

All employees/volunteers must respect their position and demonstrate integrity in relationships. There can be a risk of power imbalances in the relationship between coaches/instructors and young climbers – the codes of conduct and good practice expectations are in place to ensure appropriate boundaries and positive practices.

“All adults who work with young people are in a position of trust which has been invested in them by parents/carers and the young people who take part in our activities.”

The Duty to Adopt Good/Best Practice at all Times

All those engaged in delivering activities and coaching to young people should adhere to the following best/good practice guidelines:

- Always deliver sessions in line with industry best practice and safety protocols outlined in Standard Operating Procedures and relevant instructor training
- Always act in line with expectations laid out in the Safeguarding Policy
- Consider the welfare of young people at all times – activities should be fun and accessible to all participants
- Pay particular attention to:
 - Not over climbing or over training young climbers

- Keeping enjoyment at the heart of what we do and encouraging healthy approaches to competition
- Motivating young people through positive feedback and constructive criticism
- Ensure young climbers can climb in an environment where inherent risk is kept to a minimum
- Never allow young climbers to climb when injured or unfit to climb
- Ensure all equipment meets PPE standards
- Where restraint is required to keep a young person safe – always follow processes outlined in training and report immediately to the DSO
- If physical support is required (i.e. spotting or support bouldering) ensure that the young person is aware of what is happening and has consented to this approach. Ensure parents/carers are aware of this approach and respect their views.
- In the event that you have to supervise young people in a changing area, ensure another adult is present. Ideally parents should take responsibility for these situations.
- The following can only be sanctioned with prior permission from the Designated Safeguarding Lead and the Management Lead for Safeguarding:
 - Taking young people alone on car journeys
 - Spending time alone with a young person who is not a direct relation
- The following must never be sanctioned:
 - Taking young people to your home (unless a direct relation)
 - Sharing a room with a young person or young people
 - Making sexually suggestive comments to a young person
 - Allowing young people to consume alcohol or take illegal recreational drugs
 - Allowing any physically rough or sexually provocative contact or games

IDENTIFYING POOR PRACTICE

What Is Poor Practice?

Poor practice is anything that contravenes the Quay Safeguarding Policy, best practice for delivering activities across our organisation (outlined in Standard Operating Procedures) or failure to adhere to the Codes of Conduct and Good Practice laid out for all employees in this document and in the Employee Handbook. Poor practice occurs where there is a lack of understanding, awareness and education – particularly in relation to what constitutes a safe, child-centred environment. Poor practice is not necessarily abuse, rather it is a breach of the codes of conduct which infringes an individual's rights. In the context of Safeguarding, poor practice relates to the behaviour of an employee or volunteer that causes distress or potential harm to a child, young person or vulnerable adult. In the widest context poor practice relates to any failure to observe best practice standards for delivery of our services and health and safety considerations.

Examples of poor practice in a climbing/coaching context include (but are not limited to):

- Delivering sessions that are not safely managed and where risks are not mitigated
- Over training or pressuring young people during climbing sessions – training that is too demanding for the development age of the child
- Rought, physical or sexually provocative games
- Not giving young people the opportunity to contribute and make decisions
- The use of sexually inappropriate or suggestive comments, even in jest
- Inappropriate physical contact
- Shouting continuously or bullying tactics
- Not calling out inappropriate language from young people
- Failure to follow event guidelines, so putting children in danger, or emergency procedures where an accident has occurred/or is likely to occur in the future.
- Coaching while under the influence of alcohol or drugs
- Failing to respond to an allegation made by a young person or failure to report something of concern
- A combination of minor incidents could also be regarded as poor practice.

PROCEDURE FOR INVESTIGATIONS AND DISCIPLINARY PROCESSES

Procedure For Dealing With Poor Practice

If you have any concerns about poor practice, use the decision flowchart on page 15 to determine the first course of action. Where concerns relate to poor practice of a safeguarding nature the first line of report should be to the Designated Safeguarding Officer and the Management Safeguarding Lead.

- If the incident meets the threshold for abuse, the Designated Safeguarding Officer will follow the procedures for reporting abuse as outlined in the flowchart. Advice will always be taken from statutory authorities/industry bodies regarding the next steps, pending any criminal or external investigation.
- If the incident relates to poor practice (not abuse) or the authorities do not pursue the matter, the Management Lead for Safeguarding will review the incident and determine the next course of action.
- In all cases, the Designated Safeguarding Office and Management Lead for Safeguarding, in consultation with any relevant governing bodies, will determine if it is appropriate for the accused employee or volunteer to be placed on temporary suspension from all or some duties pending an investigation.

Internal Investigation Procedures

An internal investigation group committee will be convened to consider all reports of poor practice. When dealing with safeguarding matters this group is typically referred to as the Safeguarding Referral Group or Case Group. This group will comprise the Designated Safeguarding Officer, the Management Lead for Safeguarding/Centre Director and may include a Company Director (typically the Director response for Safeguarding). External advisors, such as technical experts or representatives from industry bodies may also be part of this group where the Directors feel additional expertise is required.

Investigation procedures and, if required, any Disciplinary proceedings will follow the procedures set out in the Disciplinary Process in the Employee Handbook.

The outcome of a process relating to an allegation of abuse/poor practice may be:

- Requirement to undertake further training
- Requirement to work under supervision when delivering services to children
- Formal warning
- Sanction – including suspension or dismissal in the case of serious breaches, repeated breaches or gross misconduct

- No further action
- No case to answer

Where concerns relate to the Designated Safeguarding Officer or Management Lead for Safeguarding, the Director Responsible for Safeguarding will take the lead and consult with the ABC Safeguarding team.

We have a duty to report to the Disclosure and Barring Service any employee who has harmed/posed a risk of harm to a child and, following investigation, has been removed from regulated activity (or left the company upon an allegation being made).

Support for Employees and Stakeholders

If you have received a disclosure, reported an incident or are the subject of an allegation you may wish to speak to someone confidentially to help you deal with what you have heard or are experiencing. The Quay will advise of mental health and other support available through our membership of the Federation of Small Business and/or industry bodies such as the ABC.

The Quay pledges to treat all those involved in a safeguarding report or incident fairly and equitably, with transparent processes. Confidentiality is essential and, in some cases, there may be criminal proceedings or further investigations by professional agencies such as Social Services. It is expected that you keep personal details linked to the situation confidential.

What Happens If You Are Accused Of An Abusive Action?

In the event that you are accused of an abusive action or poor practice:

- Make notes of all your actions/contacts with the young person in question as soon as possible
- Seek access to professional and legal advice
- Follow the procedures laid out in the Safeguarding Policy
- Accept that colleagues may not be in a position to discuss the matter with you while the investigation is underway
- Accept that you may be suspended from working with young people or from work while any investigation is underway

These situations are incredibly challenging for all concerned. The Quay will do its utmost to remain impartial in all matters relating to an allegation. The main concern with any incident is the child's welfare but it is important that the welfare of anyone accused is also considered.

WHISTLEBLOWING POLICY

The company has adopted a Whistleblowing Policy to support all employees and stakeholders to raise concerns or issues about someone or something in the organisation that constitutes poor practice, is an illegal activity or contravenes the Safeguarding Policy. A copy of this policy is also published in the Employee Handbook.

Policy Statement

This organisation encourages a free and open culture in dealings between its managers, employees, and all people with whom it engages in business and legal relations. In particular, this organisation recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Workers who, in the public interest, raise genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

This policy is underpinned by the legal framework set out in the Public Interest Disclosure Act 1998 (PDA) which protects workers who make a protected disclosure about wrongdoing in the workplace from dismissal or detrimental treatment.



Protected Disclosure

A disclosure is 'protected' if it meets these criteria:

- The worker **reasonably believes** the information shows one or more of the following:
 - A criminal offence
 - Breach of a legal obligation
 - Miscarriage of justice
 - Danger to health or safety
 - Damage to the environment
 - Deliberate concealment of any of the above
- The disclosure must be made in the public interest (a key test introduced by the Enterprise and Regulatory Reform Act 2013).

A protected disclosure occurs when an employee/volunteer/contractor/board member/job applicant provides certain types of information, either to the employer or to a governing body/statutory body, which has come to their attention through work with an organisation. The 'whistleblower' is not usually directly or personally affected by the identified issue, danger or illegality, but may be in fear of repercussions for reporting it.

Protected disclosure is there to support employees and stakeholders to speak up where they think there is malpractice or breach of policies. The following do not typically fall under the remit of a protected disclosure:

- Exclusively workplace grievances
- Disputes with an employer linked to employment contracts
- Challenge to disciplinary or grievance procedures (Appeals processes are in place for this and are outlined in the Employee Handbook)
- When it is your job to uncover a wrongdoing (ie a police officer)
- When the information is disclosed in a legally privileged setting

Untrue Allegations

No disciplinary or other detrimental action will be taken against a whistleblower who makes an allegation in reasonable belief that it is in the interest of the welfare and wellbeing of the general public, even if the allegation is not substantiated by an investigation. An employer is vicariously liable for detrimental treatment and if this occurs it should be immediately raised with a Manager or Director so that the matter can be investigated thoroughly. Detrimental treatment includes, for example, harassment, bullying or not complying with a person's rights and entitlements under their contract of employment.

However, disciplinary action may be taken against a whistleblower who makes an allegation carelessly, maliciously, for personal gain or where the disclosure contains information which the worker does not substantially believe to be true. This may constitute gross misconduct for which summary dismissal is the sanction.

Procedure

- If a worker wishes to raise or discuss any issues which might fall into one of the categories listed in clause (1), they should contact the Centre Director/Management Lead for Safeguarding or, in their absence one of the Company Directors. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the worker who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the worker's working relationships are not prejudiced by the fact of the disclosure.
- If a worker reasonably believes that the relevant failure (i.e. one of the set of circumstances listed above under clause (1)) relates wholly or mainly to the conduct of a person other than someone who works for the Quay Climbing Centre Ltd, then they should make that disclosure to that other person's employer.
- Where the individual believes that it is inappropriate to make the disclosure within the organisation (for example the Disclosure relates to practices of the organisations Directors or Centre Director) or where previous disclosures have been unsuccessful, they should contact either:
 - The ABC Safeguarding Team for advice and guidance; or
 - Protect (formerly known as Public Concern at Work) – the UK's leading charity advising on Whistleblowing – protect-advice.org.uk or telephone 0203 117 2520
- The Whistleblower may make their initial report verbally or in writing but should outline relevant information in writing as soon as possible including:
 - Name of the person making the allegation and contact details
 - Factual details about the allegation including names and positions of relevant individuals, what occurred, when it occurred and who was involved
 - Provide any supporting information or detail witnesses present
- The allegation will be reviewed and, where appropriate, fully investigated.
- The Whistleblower will receive an acknowledge of the reported allegation in writing within 5 days of the disclosure with an indication of the steps being taken (for example investigation, potential duration, support mechanisms)

All details will be stored confidentially and in line with GDPR legislation

APPENDIX 1

SAFEGUARDING CHILDREN AND YOUNG PEOPLE REPORT FORM

To be completed as fully as possible if you have concerns regarding a child or young person. This form should be sent to the Designated Safeguarding Officer and Management Lead for Safeguarding.

| Section 1 – Incident/Report Date | | | |
|---|-----|--|----|
| Date of Incident | | | |
| Date of Report (if different) | | | |
| Section 2 – Your Details | | | |
| Name | | | |
| Position in (or relationship to) the organisation | | | |
| Contact number | | | |
| Contact email | | | |
| Section 3 – Young Person’s Details | | | |
| Name | | | |
| Address | | | |
| Date of birth/age (if known) | | | |
| Section 3 – Parent/Guardian Details | | | |
| Name (s) | | | |
| Contact phone number(s) | | | |
| Email address (es) | | | |
| Address: | | | |
| Relationship to Young Person | | | |
| Is this person a legal guardian | Yes | | No |
| Is the Parent/Carer aware of this report | Yes | | No |
| If No, please explain reasons | | | |

| Section 4 – Details of concern | |
|--|--|
| Please complete the following section with as much detail about the specific concern or allegation. Please give details about what you have seen/been told/other (includes dates/times/locations etc). Please also give details of witnesses or others who may be involved in the situation. Please state clearly where information is fact or professional opinion. | |
| Date/Time of Incident | |
| What Happened | |
| Nature of the allegation/concern | |
| Any visible or observed signs of abuse (describe any injuries, behavioural signs or indirect signs). | |
| The Young Person's account of what happened and how they were impacted. Remember do not ask leading questions. | |
| Actions taken so far including whether anyone else has been contacted/who? | |

| Section 5 – Details of the person alleged to be causing harm (if known) | | | | |
|---|-----------------------|-----|--|----|
| Name | | | | |
| Address | | | | |
| Contact telephone | | | | |
| Date of Birth/Age | | | | |
| Role in organisation | | | | |
| Do they have contact with other young people in the course of their work/role | | | | |
| Section 6 – Other Professionals Contacted | | | | |
| NSPCC | | Yes | | No |
| If yes | Name | | | |
| | Contact No | | | |
| | Case/Ref No. | | | |
| | Advice Given | | | |
| ABC Safeguarding | | Yes | | No |
| If yes | Name | | | |
| | Contact No | | | |
| | Case/Ref No. | | | |
| | Advice Given | | | |
| Police | | Yes | | No |
| If yes | Name | | | |
| | Contact No | | | |
| | Case/Ref No. | | | |
| | Advice Given/Comments | | | |
| Medical Services/Ambulance | | Yes | | No |
| If yes | Name | | | |
| | Contact No | | | |
| | Case/Ref No. | | | |
| | Comments | | | |

| | | | | | |
|--|-----------------------|-----|------------------------|----|--|
| Devon MASH or LADO | | Yes | | No | |
| If yes | Name | | | | |
| | Contact No | | | | |
| | Case/Ref No. | | | | |
| | Advice Given/Comments | | | | |
| Section 10: Contact with Safeguarding or Other Personnel in the organisation | | | | | |
| Who else has been informed of this issue? – and what was the reason for information sharing. | | | | | |
| | | | | | |
| Consultation with Safeguarding Team | | | Dates and times | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Completed Form copied to Designated Safeguarding Lead/Management Lead for Safeguarding | | | | | |
| Your Signature: | | | | | |
| Date: | | | | | |

OFFICE USE ONLY

Section 11 – Ongoing Case Notes – Designated Safeguarding Lead or Safeguarding Team. Please complete as a chronology




| | | | |
|----------|--|------------------------------|--|
| Date | | Other Professionals Involved | |
| Summary: | | | |
| | | | |
| Date | | Other Professionals Involved | |
| Summary: | | | |
| | | | |

| | | | |
|----------|--|------------------------------|--|
| Date | | Other Professionals Involved | |
| Summary: | | | |
| Date | | Other Professionals Involved | |
| Summary: | | | |
| Date | | Other Professionals Involved | |
| Summary: | | | |

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