Safeguarding Adults Policy and Procedures.

Policy updated July 2026

Control Sheet

Approvals

Think Active Advisory Board – Updates May 2025	8th May 2025
Think Active Advisory Board	9th September 2026

Next Scheduled Review dates

Review Date	
8th May 2025	Completed – 1. Added low level concern 2. Added statement from board champion 3. Removed terminology Safeguarding Adults at risk to just Adults 4. Updated flowcharts 5. Added useful contacts at the bottom of the policy 6. Rephrased the 6 principles originally had been copy and pasted from the care act 2014 added paragraph
June 2026	1. Updated legislation and statutory guidance references. 2. Added Care and Support Statutory Guidance. 3. Added Working Together to Safeguard Children (2023) reference. 4. Added Online Safety Act 2023 reference. 5. Updated Mental Capacity Act section to include Liberty Protection Safeguards (LPS). 6. Updated cyberbullying section to include wider online harms. 7. Updated radicalisation wording to align with Prevent safeguarding guidance. 8. Updated review arrangements.
June 2027	
May 2028	
May 2029	

Designated Lead Officer
Bradley Jacques - Partnership Manager (CYP Lead)

Deputy Designated Lead Officer
Kerry Luckett – Head of Business Operations

Board Champion
Liam Hope

Key Compliance Dates
Disclosure and Barring Service Checks (DBS) checks will be undertaken where roles meet the legal eligibility criteria and where a risk assessment identifies this as appropriate.
Team member training Annual review
Safeguarding Lead Training Continuous Learning with annual review
Board Member Training Annual Review

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Board commitment to Safeguarding

The Think Active Board is fully committed to promoting the safety, wellbeing, and dignity of all adults engaging in our wider work, projects and initiatives. Safeguarding is a fundamental part of our work and responsibility, and we uphold the highest standards in ensuring that our environment is safe, supportive, and respectful for everyone. (Liam Hope, Board Safeguarding and Welfare Champion)

Safeguarding Adults

Think Active is committed to safeguarding and promoting the welfare and safety, both physically and emotionally, of every adult who participates in activities either directly organised by Think Active or through partners working collaboratively with us.

We firmly believe that everyone has the right to take part in sport free from harm, bullying or persecution and that sport can play a significant role in the social, emotional, physical and moral development of young people and adults. Sport helps people grow and develop and can provide opportunities for enjoyment and achievement. Through sport young people and adults can develop valuable qualities such as leadership, confidence and self-esteem.

Everyone has the right to have fun, be safe and free from harm whether training for a local team, playing for a local club or representing their sport and country at an international level.

Safeguarding is everyone's responsibility. If you have concerns about an adult's safety and or wellbeing you must act on these. It is not your responsibility to decide whether or not an adult has been abused. It is however your responsibility to act on any concerns.

Introduction

Think Active is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in all sports in accordance with the Care Act 2014.

Think Active safeguarding adults' policy and procedures apply to all individuals involved in Think Active.

Think Active will encourage and support partner organisations, including clubs, groups, organisations, deliverers, suppliers, and sponsors to adopt and demonstrate their commitment to the principles and practice of equality as set out in this safeguarding adult's policy and procedures.

Principles

The guidance given in the policy and procedures is based on the following principles:

- Equality and Protection: Every adult regardless of personal characteristics or circumstances has the right to safety and protection from abuse.
- Inclusivity and Accessibility: Think Active is committed to adapting and evolving to ensure sport is accessible and inclusive for everyone.
- Respect and Dignity: All individuals will be treated with respect and their worth upheld.
- Awareness of Changing Needs: Recognition that adults' needs may change over time, particularly for those requiring care or support.
- Shared Responsibility: Everyone involved has a duty to report concerns, whether internal or external.
- Seriousness and Swift Action: All allegations are treated with urgency and in accordance with established safeguarding procedures.
- Collaboration with Authorities: Full cooperation with statutory agencies and safeguarding boards is a priority.

The six principles of adult safeguarding

The Care Act 2014 sets out the six Safeguarding principles these will underpin all Think Active's safeguarding processes, ensuring that they are person-centered, focused on empowerment, prevention, proportionality, protection, partnership, and accountability, and that they work in a way that promotes the well-being, safety, and dignity of individuals at risk.

1. Empowerment - People being supported and encouraged to make their own decisions and informed consent.
2. Prevention – It is better to take action before harm occurs.

3. Proportionality – The least intrusive response appropriate to the risk presented.
4. Protection – Support and representation for those in greatest need.
5. Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. Accountability – Accountability and transparency in delivering safeguarding.

Making Safeguarding Personal

Think Active sets out to make Safeguarding personal meaning that adult safeguarding should be person led, and outcome focused. Emphasising on engaging the person concerned about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control. As well as improving quality of life, well-being and safety. Wherever possible, Think Active will discuss safeguarding concerns with the adult concerned to obtain their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary. Where an adult has substantial difficulty understanding, retaining, weighing or communicating information, Think Active will consider whether advocacy, family support or other communication assistance is required to enable meaningful involvement in safeguarding processes

Wellbeing Principle

The concept of wellbeing is threaded throughout the Care Act 2014, and it is one that is relevant to adult safeguarding in sport and activity. Wellbeing is different for each of us, Think Active will embed the wellbeing themes below and ensure they are threaded through all work undertaken by the organisation.

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health and emotional wellbeing
- Protection from abuse and neglect
- Control by the individual over their day-to-day life (including support provided and the way it is provided)
- Participation in work, education, training or recreation
- Social and economic wellbeing
- Domestic, family and personal domains

Legislation

The practices and procedures within Think Active's Adults policy are based on the principles contained within the UK legislation and Government Guidance. They take the following into consideration:

- Care Act 2014
- Care and Support Statutory Guidance (issued under the Care Act 2014)
- Protection of Freedoms Act 2012
- Domestic Abuse Act 2021
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005, including Deprivation of Liberty Safeguards (DoLS)
- Sexual Offences Act 2003
- Human Rights Act 1998
- Data Protection Act 2018 & UK GDPR
- Online Safety Act 2023, where safeguarding concerns involve online or digital harm

Types of Abuse and Neglect

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

- **Self-Neglect -** Failure to care for personal hygiene, health, or environment, including behaviours like hoarding.
- **Modern Slavery -** Covers slavery, human trafficking, forced labour, and domestic servitude—often involving coercion and abuse.
- **Domestic Abuse & Coercive Control -** Includes psychological, physical, sexual, financial, and emotional abuse; also encompasses 'honour'-based violence within any family relationship.

- **Discriminatory Abuse** - Targeting individuals due to race, gender, disability, or other protected characteristics under the Equality Act.
- **Organisational Abuse** - Neglect or poor care within institutions or care settings, including repeated or systemic failings.
- **Physical Abuse** - Acts like hitting, slapping, restraint, misuse of medication, or other physical harm.
- **Sexual Abuse** - Unwanted or non-consensual sexual activity, including harassment, assault, exploitation, and exposure to inappropriate material.
- **Financial or Material Abuse** - Theft, fraud, coercion over financial matters, or misuse of someone's property or benefits.
- **Neglect** - Failure to provide necessary care, support, food, heating, or medical treatment.
- **Emotional or Psychological Abuse** - Includes threats, isolation, intimidation, verbal abuse, and controlling behaviour.

Other Relevant Safeguarding Issues (Not Listed in the Care Act 2014)

- **Cyberbullying and Online Harm - The use of social media, messaging applications, gaming platforms, email, websites, or other digital technologies to harass, intimidate, manipulate, exploit, threaten, discriminate against, or humiliate another person.**
- **Forced Marriage** - Marriage without consent, including where individuals lack capacity; now a criminal offence under the Anti-social Behaviour, Crime and Policing Act 2014.
- **Mate Crime** - Abuse, manipulation or exploitation carried out by someone who has formed or claims to have formed a friendship or relationship with the person. This may involve financial exploitation, coercion, sexual exploitation, criminal exploitation or emotional abuse and disproportionately affects people with learning disabilities and other disabled adults.
- **Radicalisation** - The process through which a person comes to support terrorism, violent extremism, or extremist ideologies associated with terrorist groups. This may occur through personal relationships, community influences, online activity, or social media. Concerns should be reported in accordance with safeguarding procedures and may require referral through Prevent safeguarding pathways.
- **Female Genital Mutilation (FGM) -** Legally defined as all procedures involving partial or total removal of all external female genitalia, or other injury to the female genital organs. This is a severe form of abuse, as defined in the Female Mutilation Act 2003, and Serious Crime Act 2015.

Signs and indicators of abuse and neglect.

Abuse can occur in any environment and can be perpetrated by a wide range of individuals. It may be inflicted by anyone; individuals may suspect that a participant is experiencing abuse or neglect. There are various signs and indicators that may suggest someone is being abused or neglected, including but not limited to:

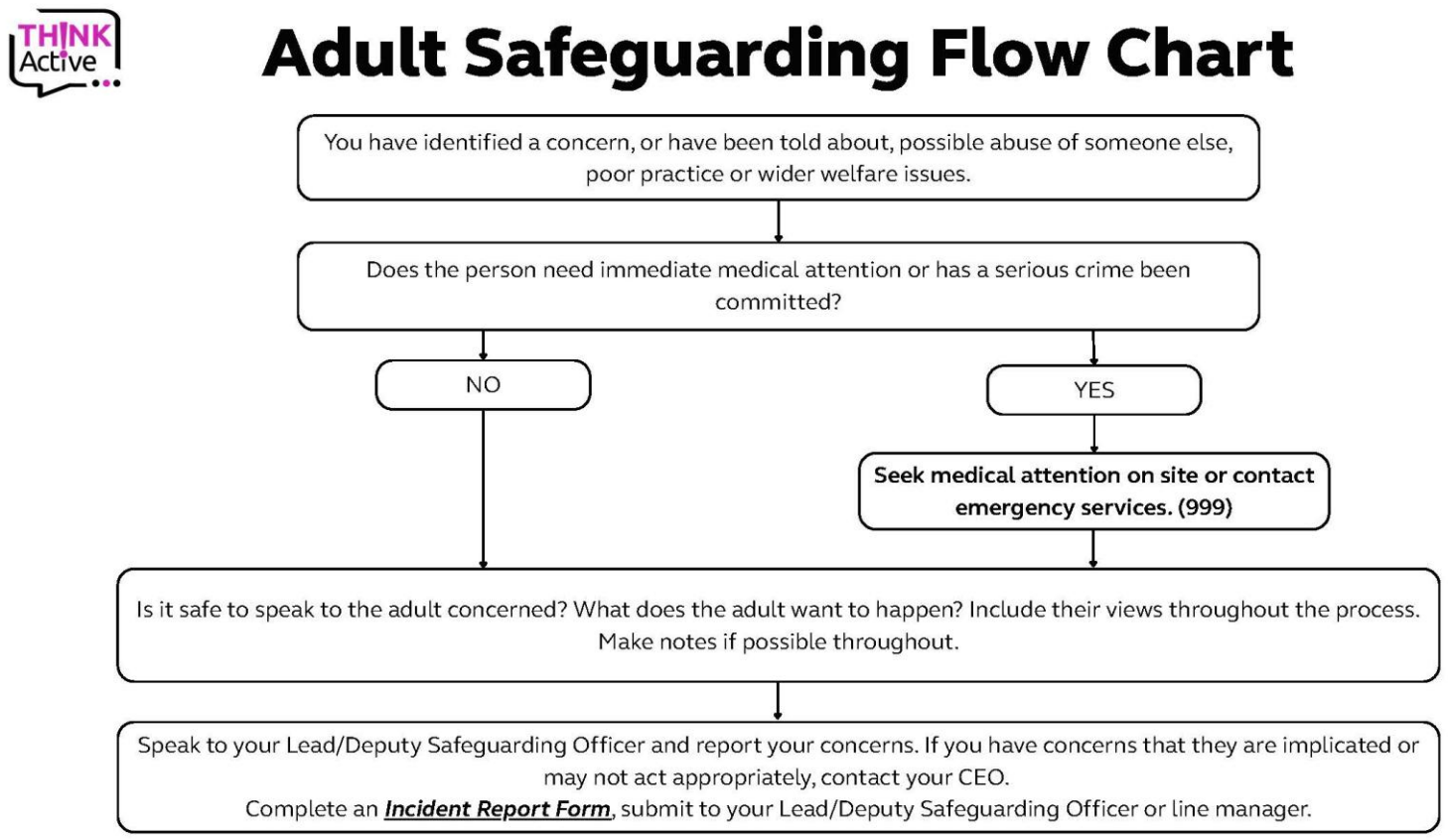
- **Unexplained injuries or lack of medical attention** – e.g. bruises, cuts, or sprains that are not properly treated or explained, especially if repeated.
- **Missing belongings or money** – personal items or money repeatedly going missing during sessions or events.
- **Disengagement or absence from activities** – participants suddenly stop attending or show a clear loss of interest in sessions, events, or teams without a clear reason.
- **Neglected appearance or hygiene** – noticeable changes such as being unclean, wearing inappropriate kit, or not bringing necessary equipment.
- **Changes in mood, confidence, or behaviour** – someone becomes withdrawn, unusually aggressive, anxious, or fearful.
- **Signs of self-harm** – visible injuries that may be self-inflicted, or conversations suggesting emotional distress.
- **Fear of individuals or groups** – reluctance or anxiety around certain participants, volunteers, or staff.
- **Direct disclosure of abuse** – the person tells you or someone else they are being hurt, neglected, or mistreated.
- **Bullying or harassment** – especially targeting protected characteristics
- **Neglect of participant needs** – e.g. denying rest, water, or necessary breaks during sessions
- **Persistent threats or intimidation** – such as one athlete threatening or scapegoating another for poor team performance.

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

It is not your responsibility to decide whether or not an adult has been abused. It is, however, everyone's responsibility to

respond to and report concerns.
If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the Think Active Lead Safeguarding or Welfare Officer, or, if the Lead Safeguarding or Welfare Officer is implicated then report to the Think Active CEO.
When raising your concern with the Club Welfare Officer or Lead Safeguarding Officer, remember Making Safeguarding Personal. It is good practice to seek the adult's views on what they would like to happen next and to inform the adult you will be passing on your concern.
Reporting a concern can be completed via the online form or alternatively completing the form at the bottom of this policy and emailing to safeguarding@thinkactive.org.
Safeguarding concerns can be raised through a range of accessible channels. Reasonable adjustments and communication support will be made available to enable reporting and participation in safeguarding processes.

Incident Report Form click to access



Think Active Safeguarding designated persons: (Name - Designation - Contact)
Bradley Jacques- Lead Safeguarding Officer - 07548973053
Kerry Luckett - Deputy Safeguarding Officer - 07885200473
Safeguarding email address: safeguarding@thinkactive.org

Think Active - Reporting a Concern

There are concerns/suspicions about a person's behaviour.
OR
There has been disclosure or an allegation about a person's behaviour

What are your concerns regarding?

Adult safeguarding

Do you need to take action to ensure the immediate safety or medical welfare of the adult?

Yes

- **Call an ambulance.**
- **Tell a doctor that there may be a safeguarding issue.**
- **Call the police.**

Is the Lead and Deputy Safeguarding Officer implicated?

No

Inform Think Active's Lead and Deputy Safeguarding Officer. Make notes and complete ***Incident Report Form***, submit to Lead Safeguarding/ Welfare officer.

Yes

Inform CEO, make notes and complete ***Incident Report Form***. Submit to the CEO. Allocate person in the organisation to investigate.

Poor practice

Is the Lead and Deputy Safeguarding Officer implicated?

Yes

No

Inform Lead and Deputy Safeguarding Officer. Make notes and complete ***Incident Report Form***, submit to Lead Safeguarding/ Welfare Officer.

Investigated by Lead and Deputy Safeguarding Officer/CEO with the support of the case management group Steering Group.

Lead Safeguarding or Deputy Safeguarding Officer follows their organisation's policy in conjunction with local Multi-Agency Safeguarding Adults Policy and Procedures. Possible referral to Police/Adult Social Care/Multi Agency Safeguarding Hub/ Local Safeguarding Adults Board.

Possible Outcomes:

- Criminal proceedings
- Police enquiry
- Adult Care Safeguarding Assessment
- Disciplinary measures
- Case management group to decide on the management of any remaining concerns
- No further action

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Remember to involve the adult throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity.

How to respond to a concern

- Make a note of your concerns.
- Record what the person has communicated using their own words or preferred communication method wherever possible. Complete an Incident Form and submit to the Think Active Lead Safeguarding or Welfare Officer.
- Remember to make safeguarding personal. Discuss your safeguarding concerns with the adult, obtain their view of what they would like to happen, but inform them it's your duty to pass on your concerns to your lead safeguarding or welfare officer.
- Describe the circumstances in which the disclosure came about.
- Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- Be mindful of the need to always be confidential, this information must only be shared with your Lead Safeguarding or Welfare Officer and others on a need-to-know basis.
- If the matter is urgent and relates to the immediate safety of an adult, then contact the emergency services immediately.

Roles and responsibilities of those within Think Active

Think Active is committed to having the following in place:

- A Lead Safeguarding/Welfare Officer to produce and disseminate guidance and resources to support the policy and procedures.
- A clear line of accountability within the organisation for work on promoting the welfare of all adults.
- Procedures for dealing with allegations of abuse or poor practice against members of staff and volunteers.
- A Steering Group or Safeguarding Referral 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 Think Active).
- A Disciplinary Panel will be formed as required for a given incident, if appropriate and should a threshold be met.
- Arrangements to work effectively with other organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Appropriate whistle blowing procedures and an open and inclusive culture that enables safeguarding and equality and diversity issues to be addressed.
- Clear codes of conduct are in place for coaches, participants, officials, spectators and other relevant individuals.

Low level concerns

A low-level concern is any concern about a person in a position of power, has behaved in a way that is inconsistent with the appropriate code of conduct or does not meet the threshold of harm or is not considered serious enough to refer to the local authority.

Low level concerns include a spectrum of behaviours which may be intentionally designed to facilitate abuse or unintentional, inadvertent or thoughtless.

Examples of low-level concerns

- Showing favouritism
- Being over-friendly
- Inappropriate language
- Intimidation, punishment or degrading treatment

All low level concerns that are raised are handled sensitively, Think Active's Safeguarding team will weigh up information to distinguish between unprofessional behaviour and intentional harm or abuse.

The low-level concern will follow the Safeguarding flow chart and initial steps to contact parties concerned will be followed.

Good/Poor practice

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental.
It is not the responsibility of any individual involved in Think Active to make judgements regarding whether or not abuse is taking place, however, all Think Active representatives have the responsibility to recognise and identify poor practice and potential abuse, and act on this if they have concerns.
Think Active will ensure that coaches or deliverers engaging with adult participants:

- Adopt and endorse the Think Active Codes of Conduct.
- Will have completed a course in basic awareness in working with and safeguarding Adults.
- Where appropriate completed a DBS check and where not appropriate a self-declaration form completed.
- Has confirmed and acknowledged the Think Active Safeguarding policy

Everyone should:

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

Equality, Diversity and Inclusion Considerations.

Think Active is committed to creating an inclusive environment where all adults are treated with dignity, fairness and respect. We recognise that some individuals and groups may experience additional barriers, increased vulnerability to abuse or discrimination, or may face challenges in reporting safeguarding concerns.
Safeguarding arrangements will be applied fairly and consistently, regardless of an individual's:

- Age
- Disability
- Sex
- Gender reassignment
- Marriage and civil partnership status
- Pregnancy and maternity
- Race, ethnicity or nationality
- Religion or belief
- Sexual orientation
- Socio-economic background

Think Active recognises that discrimination, prejudice, harassment, victimisation and exclusion can have a significant impact on an individual's wellbeing and may increase safeguarding risks.
We are committed to:

- Promoting equality of opportunity and inclusion.
- Making reasonable adjustments where required to support participation and engagement.
- Providing safeguarding information in accessible formats where required, including Easy Read, large print, plain English, audio, translated materials and communication support. Adults will be supported to communicate their views, wishes and desired outcomes using their preferred method of communication, listening to and valuing the views, wishes and experiences of adults involved in our activities.
- Responding appropriately to concerns involving discriminatory abuse, hate incidents or unequal treatment.
- Challenging behaviours, attitudes and practices that may negatively impact the safety, wellbeing or dignity of others.
- Working to remove barriers that may prevent individuals from accessing support, reporting concerns or participating in activities.

All safeguarding concerns will be considered in the context of an individual's personal circumstances and protected characteristics, ensuring that responses are person-centred, proportionate and inclusive.

Digital Safeguarding

Think Active recognises that safeguarding concerns may occur both in person and online. Staff, volunteers, partners and participants should use digital communication responsibly and in accordance with Think Active's social media Policy and Code of Conduct.

Concerns relating to online abuse, cyberbullying, exploitation, inappropriate communications, online grooming, harassment or radicalisation should be reported using the same safeguarding procedures outlined within this policy.

Relevant Policies

This policy should be read in conjunction with the following Think Active policies, procedures and guidance documents:

- Safeguarding Children and Young People Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Code of Conduct
- Complaints Policy and Procedure
- Disciplinary Policy and Procedure
- Social Media Policy
- Privacy Policy
- Data Protection Policy
- Health and Safety Policy
- Risk Assessments

All policies are available from Think Active upon request and should be considered alongside this Safeguarding Adults Policy when responding to concerns regarding the welfare, safety, and wellbeing of adults.

Definitions

To assist working through and understanding Think Active's Safeguarding Adults Policy several key definitions are explained below:

- **Adults are** anyone aged 18 or over:
- **Adults in need of care and support** is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors. Naturally, a person's disability or frailty does not mean that they will inevitably experience harm or abuse. In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined by considering a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors.
- **Abuse** is a violation of an individual's human and civil rights by another person or persons. See section 4 for further explanations.
- **Adult safeguarding** is protecting a person's right to live in safety, free from abuse and neglect.
- **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 (MCA 2005).

Incident Report Form

Safeguarding Adults Incident form – Where possible complete the Online Form
To be completed as fully as possible if you have concerns regarding an adult. It is important to inform the adult about your concerns and that you have a duty to pass the information onto the safeguarding officer. The safeguarding officer will then look at the information and start to plan a course of action, in conjunction with yourself, the adult involved and if necessary social care or other relevant organisations.

	Safeguarding Concern Form
Use this form to record any safeguarding concern, however trivial. Forward it **immediately** to Lead Safeguarding Officer. Answer every question; continue a blank sheet if necessary. Email: **safeguarding@thinkactive.org** Lead Safeguarding Officer – **Kerry Luckett - 07885 200 473** Deputy Safeguarding Officer – **Bradley Jacques - 07548 973053**	
Report ref no. (internal use)	

Details of person at risk			
Name of person		DOB:	
Service (or home address)			

About You (the person filling in this form)			
Your name		Job title	
Service		Date	

About the safeguarding concern	
If this incident/concern has also been reported on an Incident/Accident Report, attach the Report appropriate reference.	
Are you reporting your own concern, or one raised by someone else?	
If you are raising a concern made by someone else, please provide their full name, status, and contact details	
Please provide details of the concern you have including dates, times, descriptions of events, full names and whether the information is first-hand or the accounts of others.	
The person at risks account (if applicable). **Include what they want the outcome to be**	
Provide details of the person causing harm (if known)	

Provide details of any witnesses to the concern	
Provide details of any previous incidents or concerns relating to this person (if known)	
Actions: Please state the immediate actions you took in response to the concern:	
Note:	
People contacted	
You must pass this form **immediately and confidentially** to the Think Active CSW lead safeguarding officer (follow order of reporting if lead is not available). The lead safeguarding officer will then inform external people as necessary. You should only contact people outside Think Active CSW to deal with an immediate emergency (for example, police or ambulance service). **Give details below of any people outside Think Active CSW that you have communicated this concern to – give name, position, contact details, and the date and time that you contacted them:**	
Declaration: I have completed all sections of this form to the best of my knowledge	
Signature	

Guidance and information

Making Safeguarding Personal
There has been a cultural shift towards Making Safeguarding Personal within the safeguarding process. The safeguarding process used to involve gathering a detailed account of what happened and determining who did what to whom. Now the outcomes are defined by the person at the centre of the safeguarding process.

The safeguarding process places a stronger emphasis on achieving satisfactory outcomes that take into account the individual choices and requirements of everyone involved.
“What good is it making someone safer if it merely makes them miserable?” – Lord Justice Mundy, “What Price Dignity?” (2010)

What this means in practice is that adults should be more involved in the safeguarding process. Their views, wishes, feelings and beliefs must be considered when decisions are made.

The Care Act 2014 builds on the concept, stating that “We all have different preferences, histories, circumstances and lifestyles so it is unhelpful to prescribe a process that must be followed whenever a concern is raised.”

However, the Act is also clear that there are key issues that should be considered when abuse or neglect are suspected, and that there should be clear guidelines regarding this.

Capacity – Guidance on Making Decisions

The issue of capacity or decision making is a key one in safeguarding adults. It is useful for organisations to have an overview of the concept of capacity. We make many decisions every day, often without realising. We make so many decisions that it's easy to take this ability for granted. But some people are only able to make some decisions, and a small number of people cannot make any decisions. Being unable to make a decision is called "lacking capacity".

To make a decision we need to:

- Understand information
- Remember it for long enough
- Think about the information
- Communicate our decision

A person's ability to do this may be affected by things like learning disability, dementia, mental health needs, acquired brain injury, and physical ill health. The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides the framework for this to happen. The MCA is about making sure that people over the age of 16 have the support they need to make as many decisions as possible.

Our ability to make decisions can change over the course of a day**.** Here are some examples that demonstrate how the timing of a question can affect the response:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

To help you to understand the MCA, consider the following five points:

1. Assume that people are able to make decisions, unless it is shown that they are not. If you have concerns about a person's level of understanding, you should check this with them, and if applicable, with the people supporting them.
2. Give people as much support as they need to make decisions. You may be involved in this – you might need to think about the way you communicate or provide information, and you may be asked your opinion.
3. People have the right to make unwise decisions. The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.
4. If someone is not able to make a decision, then the person helping them must only make decisions in their "best interests". This means that the decision must be what is best for the person, not for anyone else. If someone was making a decision on your behalf, you would want it to reflect the decision you would make if you were able to.
5. Find the least restrictive way of doing what needs to be done.

Consent and Information Sharing

Think Active team members and volunteers should always share safeguarding concerns with their safeguarding lead or welfare officer in the first instance, except in emergency situations. As long as it does not increase the risk to the individual, the worker or volunteer should explain to them that it is their duty to share their concern with their safeguarding lead or welfare officer.

Think Active recognises that safeguarding information sharing is essential to protecting adults from abuse and neglect. Information will be shared lawfully, proportionately, securely, and only with those who need to know, in accordance with the Data Protection Act 2018, UK GDPR, the Care Act 2014 and relevant safeguarding guidance.

The safeguarding lead or welfare officer will then consider the situation and plan the actions that need to be taken, in conjunction with the adult and in line with the Think Active's policy and procedures and local safeguarding adults board policy and procedures.

Individuals may not give their consent to the sharing of safeguarding information with the safeguarding adult's team for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view on whether it is best to share information.

If they still do not consent, then their wishes should usually be respected. However, there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people, or a serious crime has been committed. This should always be discussed with your safeguarding lead and the local authority safeguarding adults' team.

If someone does not want you to share information outside of the organisation or you do not have consent to share the information, ask yourself the following questions:

- Is the adult placing themselves at further risk of harm?
- Is someone else likely to get hurt?
- Has a criminal offence occurred? This includes: theft or burglary of items, physical abuse, sexual abuse, forced to give extra money for lessons (financial abuse) or harassment.
- Is there suspicion that a crime has occurred?

If the answer to any of the questions above is 'yes' - then you can share without consent and need to share the information.

When sharing information there are seven Golden Rules that should always be followed.

1. Seek advice if in any doubt
2. Be transparent - The Data Protection Act (DPA) is not a barrier to sharing information but to ensure that personal information is shared appropriately; except in circumstances where by doing so places the person at significant risk of harm.
3. Consider the public interest - Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
4. Share with consent where appropriate - Where possible, respond to the wishes of those who do not consent to share confidential information. You may still share information without consent, if this is in the public interest.
5. Keep a record - Record your decision and reasons to share or not share information.
6. Accurate, necessary, proportionate, relevant and secure - Ensure all information shared is accurate, up to date; necessary and share with only those who need to have it.
7. Remember the purpose of the Data Protection Act (DPA) is to ensure personal information is shared appropriately, except in circumstances whereby doing so may place the person or others at significant harm.

Legislation and Government Initiatives

Sexual Offences Act 2003
http://www.legislation.gov.uk/ukpga/2003/42/contents
The Sexual Offences Act introduced a number of new offences concerning vulnerable adults and children. www.opsi.gov.uk

Mental Capacity Act 2005
http://www.legislation.gov.uk/ukpga/2005/9/introduction
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

Safeguarding Vulnerable Groups Act 2006
http://www.legislation.gov.uk/ukpga/2006/47/contents
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

Deprivation of Liberty Safeguards
https://www.gov.uk/government/collections/dh-mental-capacity-act-2005-deprivation-of-liberty- safeguards
Deprivation of Liberty Safeguards (DoLS) were introduced through the Mental Capacity Act 2005 to protect people who lack capacity and may be deprived of their liberty in their best interests. Think Active also recognises the future implementation of Liberty Protection Safeguards (LPS), which are intended to replace DoLS and provide a revised legal framework for authorising deprivation of liberty arrangements.

Disclosure & Barring Service 2013
https://www.gov.uk/government/organisations/disclosure-and-barring-service/about

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

The Care Act 2014
http://www.legislation.gov.uk/ukpga/2014/23/introduction/enacted
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.

Care and Support Statutory Guidance (Care Act 2014) - This statutory guidance supports implementation of the Care Act 2014 and provides the framework for adult safeguarding, safeguarding enquiries, information sharing, partnership working and Making Safeguarding Personal. Think Active will have regard to this guidance when responding to safeguarding concerns.

Online Safety Act 2023 - The Online Safety Act 2023 strengthens protections against harmful online content and behaviour. Think Active recognises that safeguarding concerns may arise through social media, messaging applications, websites, gaming platforms and other digital environments and will respond appropriately to any concerns raised.

Making Safeguarding Personal Guide 2014
http://www.local.gov.uk/documents/10180/5852661/Making+Safeguarding+Personal+-+Guide+2014/4213d016-2732-40d4-bbc0-d0d8639ef0df

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

Useful contacts

If you wish to contact Think Active's Safeguarding team, please email Safeguarding@thinkactive.org

Lead Safeguarding Officer – Bradley Jacques 07548 973053

Deputy Safeguarding Officer –Kerry Luckett: 07885 200 473

Please note our typical office hours are 9-4pm Monday to Friday and will respond as soon as possible outside of these hours.

In an emergency, please call: 999

If you have safeguarding or welfare concerns over a child, young person or adult, please use the links below for further advice and support

Coventry: Multi Agency Safeguarding Hub (MASH)

Solihull Safeguarding

Warwickshire Safeguarding

Ann Craft Trust help and support

Further support, advice and guidance on safeguarding and welfare is available in our Club Support Toolkit

Ann Craft Trust - Safeguarding Adults in Sport and Activity:
Website: www.anncrafttrust.org
Email: Ann Craft Trust Telephone: 0115 951 5400

Further Information

Think Active follows recognised safeguarding standards and guidance published by Sport England and the Ann Craft Trust to support good safeguarding practice across sport and physical activity settings.
Policies, procedures and supporting information are available on the Think Active website.

Lead Safeguarding Officer**: Bradley Jacques - bradley.jacques@thinkactive.org**
Deputy Safeguarding Officer**: Kerry Luckett – Kerry.luckett@thinkactive.org**

Review date
This policy will be reviewed annually, or sooner following legislative changes, safeguarding incidents, organisational learning, updates to statutory guidance, or changes in recognised best practice.

Thanks also to members of the Safeguarding Adults in Sport Steering Group.

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