

SECTION THREE

REPORTING PROCEDURES



The Government's guidance 'Working Together to Safeguard Children 2013' states that 'safeguarding is everyone's responsibility and sets out how individuals and organisations should work together to safeguard and promote the welfare of children.'

England Hockey has developed policies, procedures and systems to manage concerns or allegations of poor practice and abuse against young people. England Hockey will always work in accordance with procedures as set out in the guidance.

The responsibility of The Hockey Family is to read, implement, monitor and evaluate the safeguarding policies, procedures and systems, so that in the event of a concern being raised a smooth process can be followed.

This section is divided into two parts:

ONE

RESPONDING TO CONCERNS

If a young person or adult has concerns, it is important that they are able to report them to someone at the club. It is therefore important that the club members know how to respond, and who will do this.

TWO

TAKING APPROPRIATE ACTION

Once a concern has been reported, it is important that appropriate action is taken. It will not be the club's responsibility to decide if action needs to be taken, unless a child is at immediate risk of harm. It is, however, the club's responsibility to report the concerns appropriately in accordance with England Hockey's policies, procedures and systems.



RESPONDING TO CONCERNS

Concerns may be raised in response to the following: There are a number of reasons a person might need to report a concern:

- something a young person has said to you – a disclosure
- signs or suspicions of abuse
- allegations made against a member of staff or a volunteer
- allegations made about a parent, carer or someone not working within the sport
- bullying
- a breach of the Code of Ethics and Behaviour
- observation of inappropriate behaviour
- anything which makes them uncomfortable based on inappropriate behaviour of an adult or changes in behaviour of a young person
- behaviour being contrary to England Hockey's Safeguarding and Protecting Young People in Hockey Policy and Procedures and Code of Ethics and Behaviour.

It is important to note that even if an incident occurs outside the hockey environment, it should still be reported to England Hockey if the adult or young person concerned is involved in hockey. This is in accordance with standard practice in sport.

ALWAYS

- Stay calm
- Reassure the person reporting their concerns that they have done the right thing in telling you
- Keep an open mind
- Listen carefully to what is said and take them seriously
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer. To help you to do this, try to ask questions starting with tell me about, explain to me, describe.
- Tell them what you will do next and with whom the information will be shared
- Report the incident to your Welfare Officer or England Hockey Ethics and Compliance Manager
- Record in writing what was said using the young person's own words as soon as possible, using the England Hockey Safeguarding Referral Form (Template 2).

DEALING WITH CONCERNS – WHEN TO INVOLVE ENGLAND HOCKEY

It is really important to deal with issues swiftly and effectively, using the most appropriate people and level of support. The following examples highlight concerns and responses at the most appropriate level for the concern:

SCENARIO ONE:

Incident dealt with at Club level

Concern

It is reported to your Welfare Officer that a young player has received some text messages from other players in the team. The messages are derogatory about their playing ability. The text messages are read by your Welfare Officer who is in agreement as to their derogatory nature.

Response

Your Welfare Officer and coach agree they will speak generally to the whole team regarding respect and support of each other and highlight the benefits to their hockey if they build the team spirit and ultimately work more cohesively, bringing success as a team. The text messages are not specifically mentioned to the team but the young player is supported by your Welfare Officer and the messages are monitored.

No further text messages are received.

Information regarding the concern and the response are recorded and held securely by your Welfare Officer (See England Hockey guidance: 'Principles of Safe Data Storage').

SCENARIO TWO:

Incident requiring advice from England Hockey

Concern

Your Welfare Officer receives information from several parents and young players about one of the coaches at the club, who has been putting their arm around the shoulders of some of the young players when talking to them about coaching, some of them feel uncomfortable about this. The coach is also regularly on his mobile phone during coaching sessions.

Response

Your Welfare Officer phones England Hockey Ethics and Compliance Team for advice on how to handle this matter.

England Hockey advise your Welfare Officer to talk to the coach involved as soon as possible and explain what has been reported. The WO should listen to the coach and establish their response. The club should establish why this behavior is happening? Is the coach inexperienced? Does the coach understand the behavior is not acceptable?

The coach states they don't realize this isn't acceptable, but, after discussion can understand why it might make people feel uncomfortable and why he needs to have full concentration on the pitch at all times.

Your WO states they take these matters seriously and inform the coach they will be monitoring future sessions. If the behavior doesn't improve, the club will not continue employing the coach. The club and coach to review the situation in 3 months times, assuming no further incidents are reported in the meantime.

Club to ensure all coaches sign up to the 'Code of Ethics and Behaviour' and understand their responsibility to safeguard young people.

Club to host a coaches briefing at the beginning of the season to establish expectations, reporting procedures, give coaches an opportunity to ask questions, agree how to deal with certain situations i.e. managing challenging behaviour.

Your WO should make a record of all conversations and actions agreed and keep securely.

Assuming the coaches behavior improves, club keeps records of incident. If behavior doesn't improve, contact England Hockey again for further guidance.

SCENARIO THREE:

Incident needing immediate referral to England Hockey

Concern

Your club Chairman reads an article in the local paper about a teacher who has been suspended from their role, following allegations about an inappropriate relationship with a pupil at the school. The teacher is also a Junior Team Manager at the hockey club.

Response

Your Chair informs your Welfare Officer who informs England Hockey's Ethics and Compliance Manager immediately for advice.

England Hockey's Case Management Panel is consulted on the incident and will lead the process for establishing facts, liaison with statutory agencies and will inform club of any actions agreed.

NEVER

- Panic
- Make promises you cannot keep, including promises to keep secrets
- Make a young person repeat the information unnecessarily
- Question the detail of what the young person has shared
- Delay in reporting to your Welfare Officer or England Hockey Ethics and Compliance Manager
- Make assumptions
- Approach the alleged abuser
- Take sole responsibility.



IMPORTANT REMINDERS

- Your organisation's Welfare Officer should be your first point of contact
- Welfare Officers should not deal with issues in isolation, they should receive support in dealing with issues by other trusted people (will vary according to organisation)
- Minimise the number of people that you share a concern with, only share information on a need to know basis
- If in doubt – ask for advice from your organisation's Welfare Officer or England Hockey (Ethics and Compliance Team)
- Deal with incidents and concerns quickly – problems escalate when they don't get addressed.

It is acknowledged that taking appropriate action is never easy and the discovery that a member of a club or colleague may be acting inappropriately, bullying or abusing a child will raise concerns and emotional feelings for the person receiving the concern, and among other colleagues.

These emotions may evolve around feelings of:

- Doubt: Is it true?
- Guilt: Should I have known?
- Did I miss something?
- Did I have any suspicions?
- Should I have said something?
- Fear: Will others or I be suspected?
- What actions should be taken?
- Confusion: What will happen?
- What will be the effect?
- Concerns: What can I do to support all those people who may need support?
- How will it affect further relationships or contact with children?
- Are there systems in place to expose future situations?

These are natural responses, but remember that the safety and welfare of young people is paramount.

It is NOT the club's responsibility to decide if a child is being abused or poor practice has occurred.

Any concerns or allegations will be managed by England Hockey, with the club's cooperation and assistance.

It IS your responsibility to report your concerns, not act on them.

Speak to your Welfare Officer or England Hockey Ethics and Compliance Manager who will:

- support you
- listen to you
- take all concerns seriously
- act immediately within hockey's policies, procedures and systems
- advise you what actions you need to take (if required).



TAKING APPROPRIATE ACTION

England Hockey has clear procedures for reporting concerns. It is important that you follow the procedure detailed and fulfill YOUR role in the process.

It is NOT your responsibility to decide if a situation is poor practice, abuse or bullying, but it IS your responsibility to report your concerns.



HOW DO YOU REPORT THE CONCERNS?

The following diagrams illustrate the reporting process depending on whether the concerns are from within or outside the hockey environment.

It is important that information regarding the concerns is recorded properly and promptly. To assist with this process, England Hockey has developed a Safeguarding Referral Form which outlines the information that is required.

As soon as possible after concerns have been reported to you, complete the safeguarding referral form and contact your Welfare Officer. In their absence, contact England Hockey's Ethics and Compliance Manager on 01628 897500 or email: safeguarding@englandhockey.co.uk

Additional contact details can be found in the 'Useful Contacts' document.

WHO DO YOU REPORT THE CONCERNS TO?

If the England Hockey Ethics and Compliance Manager is not available, and a child is at immediate risk or in danger, you must avoid delay and seek advice from your local authority Children Social Care Department (previously Social Services) and the Police.

You should report to the Local Authority Children's Social Care Department (Social Services) or Police in the area that the child lives (see England Hockey Reporting Procedures).

As soon as possible, inform England Hockey's Ethics and Compliance Manager and share the action taken to date.



"I enjoy playing with my friends and having fun!"

FOR OTHER SITUATIONS, WHERE A CHILD IS NOT AT IMMEDIATE RISK OR DANGER:

Working in an affiliated club or organisation

- You must report your concerns or any information received to the Welfare Officer
- The Welfare Officer may seek advice or refer the matter to England Hockey Ethics and Compliance Manager.

Working in a school

- You must inform the designated teacher, who will follow their reporting procedures. Also advise England Hockey's Ethics and Compliance Manager for their information.

If your concern is regarding the Welfare Officer, report directly to the England Hockey Ethics and Compliance Manager.

WHAT HAPPENS NEXT?

Statutory Agencies will follow procedures under The Children Acts 1989 & 2004, and Government Guidance "Working Together to Safeguard Children".

Where a concern is reported to England Hockey and further action is required, England Hockey's Ethics and Compliance Manager and England Hockey's Case Management Group will follow the Safeguarding and Protecting Young People Complaints and Disciplinary Regulations. These are available on request from England Hockey and on the England Hockey website www.englandhockey.co.uk/safe.

At all times England Hockey will support and communicate with the Club Welfare Officer where required in the management of the situation.

In some circumstances it may be most appropriate for the matter to be handled at local level e.g. on matters relating to minor poor practice or bullying. If this is appropriate suitable guidance will be given by the England Hockey Ethics and Compliance Manager.

REFERENCES:

HM Government 2013: Working Together to Safeguard Children
<https://www.education.gov.uk/about/dfes/statutory/goo213160/working-together-to-safeguard-children>



REPORTING CONCERNS OF POSSIBLE ABUSE **WITHIN** A HOCKEY ENVIRONMENT IN RELATION TO A YOUNG PERSON

What to do if you are concerned about the behaviour of any volunteer, staff of England Hockey or any other member of the Hockey family.



POTENTIAL OUTCOMES

There are a number of potential outcomes from this process; therefore this list is not exhaustive:

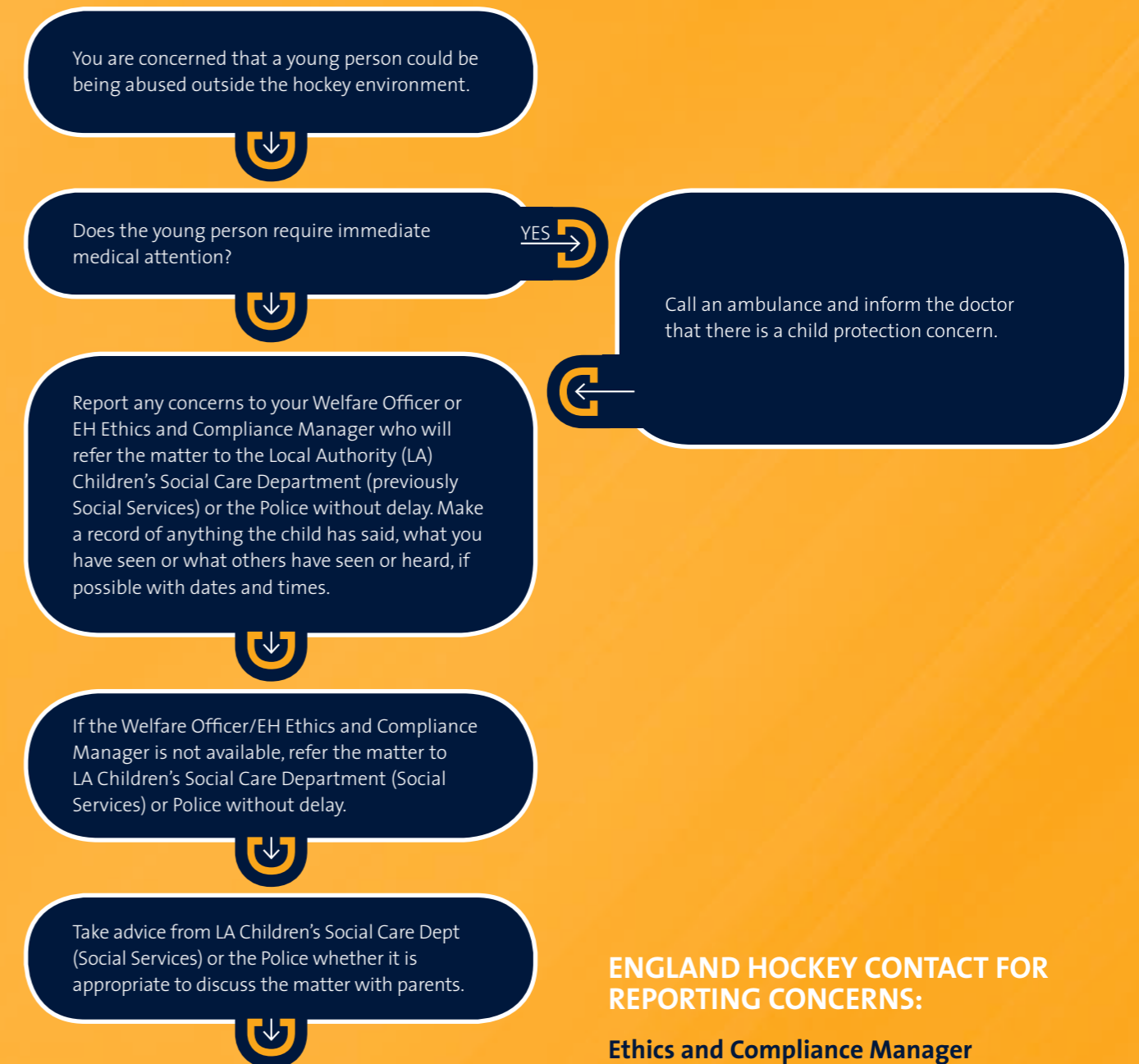
- Referred back to club/organisation with advice on process to be followed
- Training, retraining or mentoring recommended
- Conditions applied to further involvement in hockey
- Interim suspension, pending further enquiries
- Referral to statutory agencies
- Sharing information with statutory agencies and other sports
- Case passed to EH Independent Safeguarding Disciplinary Panel to be dealt with under the EH Safeguarding Regulations.

It is natural to be concerned about the potential implications of reporting concerns. These are natural responses, but remember that the safety and welfare of young people is paramount. Reported concerns will be dealt with professionally and confidentially.

NOTE: England Hockey's Safeguarding and Protecting Young People (SPYP) Complaints and Disciplinary Regulations (Safeguarding Regulations) can be found at www.englishockey.co.uk/safe

REPORTING CONCERNS OF POSSIBLE ABUSE **OUTSIDE** THE HOCKEY ENVIRONMENT IN RELATION TO A YOUNG PERSON

What to do if you are concerned that a young person is being abused outside the hockey environment (but that concern is identified through that young person's involvement in hockey).



ENGLAND HOCKEY CONTACT FOR REPORTING CONCERNS:

Ethics and Compliance Manager (Lead for Safeguarding):

Tel: 01628 897500

Email: safeguarding@englandhockey.co.uk

NSPCC Helpline (free 24 hour helpline):

0808 800 5000

Also see 'Useful Contacts' document.

GOOD PRACTICE IN SHARING INFORMATION

Some information that may need to be shared regarding a concern for the well-being of a young person may be personal and/or sensitive.

The following principles are good practice in how this information is shared:

GOLDEN RULES OF SHARING SENSITIVE INFORMATION¹

1. The Data Protection Act is not a barrier to sharing information, it provides a framework to ensure personal information is shared appropriately.
2. Be open and honest with the young person (and / or their family where appropriate) about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice if you are in any doubt. Advice could come from England Hockey Ethics and Compliance Manager, NSPCC, Local Authority Children's Social Care Dept (Social Services) or the Police. It may be possible to gain the advice without disclosing the identity of the young person.
4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgment, that lack of consent can be overridden in the interest of the young person. You will need to base your decision on the facts of the situation.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the young person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, share only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. (Inform the England Hockey Ethics and Compliance Manager of your actions).

CONFIDENTIALITY

- Every effort must be made to ensure that confidentiality is maintained when an allegation has been made and is being investigated.
- Only tell individuals who need to know and can help to manage the concern.

Confidentiality is essential and if maintained will ensure:

- the safety of the young person involved
- that action is taken to protect the young person
- that individuals involved in any complaint are protected from gossip and assumptions
- that individuals who have a complaint against them receive fair treatment, without prejudice or pre-judgment
- that all policies, procedures and systems can work to manage any situation quickly, professionally and effectively.

IMPACT IF CONFIDENTIALITY IS BREACHED

If confidentiality is breached the following can happen:

- the young person is put in danger either by further inappropriate action of any adult involved or other individuals who hear about any concern through rumours through lack of action
- any investigation by either England Hockey or the statutory agencies may be invalidated by misinformation or rumours
- individuals with a complaint against them may be victims of inappropriate behaviour from club members
- the policies, procedures and systems in place will not support or uphold any complaint or concern.

“I trust the coaches and helpers and I know I can go straight to them with a problem.”



WHISTLE BLOWING POLICY

If there is a concern with regard to the behaviour of an adult towards a young person, it is important that you share your concerns with the England Hockey Ethics and Compliance Manager.

All information received and discussed will be treated in confidence and only shared with those individuals within England Hockey who will be able to manage and resolve the situation. On occasion it may be necessary to seek advice, or inform the statutory agencies e.g. Children's Social Care or the Police. All concerns will be taken seriously and managed according to the England Hockey Safeguarding Young People Policies and Procedures.

GENERAL PRINCIPLES

A member of the Hockey Family is often the first to realise that a young person's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation. In these circumstances it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice.

England Hockey is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, individuals are encouraged, if they have serious concerns about any aspect of a young person's safety and welfare, to come forward and voice those concerns.

This policy makes it clear that individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within England Hockey rather than overlooking a problem or blowing the whistle outside.

It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly. This includes the interests of England Hockey, its employees, all persons registered as members of England Hockey and any persons who are the subject of any complaint, as well as the person making the complaint.

SAFEGUARDS

England Hockey is committed to good practice and high standards and wants to be supportive of everyone within the Hockey Family.

England Hockey recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged poor practice. If an individual believes what they are saying to be true, they should have nothing to fear, because in reporting their concern they will be doing their duty to the young person concerned.

England Hockey will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect individuals when they raise a concern in good faith.

Any investigation into allegations of poor practice will not influence or be influenced by any disciplinary procedures that already affect individuals unless there may be a pattern of poor practice/abuse which requires the cases to be linked /dealt with together.

CONFIDENTIALITY

England Hockey will do its best to protect the identity of the whistleblower when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by the whistleblower may be required as part of the evidence. They will be given prior notice of this and a chance to discuss the consequences.



ANONYMOUS ALLEGATIONS

This policy encourages the whistleblower to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered (at the discretion of the England Hockey Case Management Group).

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources or factual records.

UNFOUNDED ALLEGATIONS:

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, it is established that they have made malicious or frivolous allegations, or for personal gain, disciplinary action may be taken against them. In such cases, England Hockey's disciplinary procedure will apply.

USE OF THE WHISTLE BLOWING POLICY

The whistle blowing policy should only be followed if the person raising the concern feels unable to follow the standard reporting procedures as set out in England Hockey's Safeguarding and Protecting Young People in Hockey Policy and Procedures.



HOW TO RAISE A CONCERN

Individuals should raise the concern in the first instance with the England Hockey Ethics and Compliance Manager

on 01628 897500

or by post to England Hockey,
Bisham Abbey National
Sports Centre, Marlow,
Buckinghamshire, SL7 1RR
(you should mark the envelope
'private & confidential');

or email

safeguarding@englandhockey.co.uk

If you believe that you have not received a satisfactory response to your concern, you should contact the Finance and Administration Director.

Concerns may be made verbally or in writing to the England Hockey Ethics and Compliance Manager (as above). The individual should set out the background and history of the concern, giving names, dates and places where possible and the reason why they are particularly concerned about the situation. The earlier the individual expresses concern, the easier it is for someone to take action.

Although the whistleblower is not expected to prove the truth of an allegation, they will need to demonstrate to the England Hockey Ethics and Compliance Manager that there are sufficient grounds for their concern.

If your concern is about the England Hockey Ethics and Compliance Manager, you should refer the matter to England Hockey's Finance and Administration Director.

If you do not want, or feel unable, to report the matter to England Hockey, a number of external agencies are also available for reporting purposes. See 'Useful Contacts' document.



HOW WILL ENGLAND HOCKEY RESPOND?

The action taken by England Hockey will depend on the nature of the concern. In all cases the matter will be referred to the England Hockey Case Management Group.

In order to protect individuals it is likely that the England Hockey Ethics and Compliance Manager will conduct initial enquiries so that the Case Management Group can decide whether an investigation is appropriate and, if so, what form it should take.

The amount of contact between the people considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the whistleblower as part of the investigation process.

When any meeting is arranged, the whistleblower has the right, if they so wish, to be accompanied by a friend or a person of their choice who is not involved in the matter to which the concern relates.

England Hockey will take steps to minimise any difficulties which individuals may experience as a result of raising a concern. For instance, if the whistleblower is required to give evidence in criminal or disciplinary proceedings, England Hockey will advise them about the procedure.

England Hockey accepts that the whistleblower needs to be assured that the matter has been properly addressed. Subject to legal constraints, they will receive information about the outcome of any investigation, and the action that is to be taken against those whose actions caused them concern. Also, if appropriate, what policy changes are to be made to minimise the possibility of a similar concern being raised in the future.

HOW CAN THE MATTER BE TAKEN FURTHER?

This policy is intended to provide individuals with a way in which they can raise concerns about the safety and welfare of any young person involved in any hockey activity under the jurisdiction of England Hockey. England Hockey hopes individuals will be satisfied that any child protection matter they raise has been considered properly. If they are not satisfied, and if they feel it is right to take the matter outside England Hockey, they should contact:

- their Local Safeguarding Children's Board (LSCB)
- their local Children's Social Care Dept (Social Services)
- their local police

If they do take the matter outside England Hockey, they will need to ensure that they do not disclose prohibited confidential information. They must check this before they make contact.

ENGLAND HOCKEY COMPLAINTS PROCEDURE

What to do if you have a complaint about the way England Hockey has dealt with a Safeguarding Young People or Child Protection issue.

England Hockey is committed to providing high levels of customer satisfaction. If you are not satisfied with the way England Hockey have handled a Safeguarding or Protecting Young People issue, please refer to the final section of the Safeguarding Young People in Hockey Complaints and Disciplinary Regulations.