

THE LAA, YOUNG PEOPLE AND VULNERABLE ADULTS SAFEGUARDING POLICY.



Introduction

The Light Aircraft Association acknowledges the duty of care to safeguard and promote the welfare of children, young people and vulnerable adults and is committed to ensuring safeguarding best practice. Based on government guidance and best practice from organisations including LAA Youth and Education Support (YES), the Scout Association and the Guides, we recommend that this document is used by the LAA and all its Struts, Member Clubs and associated organisations.

This policy:

- Applies to all adults and anyone working on behalf of the LAA.
- Recognises that the welfare and interests of children, young people and vulnerable adults are paramount in all circumstances; and
- Aims to ensure that all children, young people and vulnerable adults have a positive and enjoyable experience in a safe environment and are protected from abuse whilst participating in LAA activities.

The LAA will:

- Promote the safety and wellbeing of children, young people and vulnerable adults; and accepts the responsibility to take reasonable and appropriate steps to ensure their welfare.
- Ensure that everyone is clear about their roles and responsibilities in respect of safeguarding;
- Promote LAA safeguarding policies and procedures; ensuring that trustees, staff and volunteers take seriously all concerns and allegations of abuse and respond appropriately;
- Securely maintain and store confidential, detailed and accurate records of all safeguarding concerns;
- Will monitor best practice in the safe recruitment of staff and volunteers working with children, young people and vulnerable adults;
- Ensure that robust safeguarding arrangements and procedures are in operation; and
- Address without delay any failure to comply with this policy.

Monitoring

This policy will be reviewed annually by the CEO and revisions recommended to the LAA Board. This policy may also be reviewed in the following circumstances:

- Changes in legislation or government guidance (including Working, relevant legislative changes and national child protection and safeguarding policies and procedures);
- In the light of learning identified by a Local Safeguarding Children Board;
- As a result of any other significant change or event.

Safeguarding Responsibilities

It is the policy of the LAA to safeguard the welfare of all children, young people and vulnerable adults by protecting them from neglect and from physical, sexual and emotional harm.

We are committed to:

- Taking the interests and well-being of children, young people and vulnerable adults into account, in all our considerations and activities.
- Respecting the rights, wishes and feelings of the children, young people and vulnerable adults with whom we work.
- Taking all reasonable practicable steps to protect them from neglect, physical, sexual and emotional abuse.
- Promoting the welfare of children, young people and vulnerable adults and their protection within a position of trust.

All LAA staff, volunteers and event organisers working with the LAA are responsible for putting this policy into practice at all times. They have a responsibility to ensure that young people are protected from harm. It is the responsibility of each adult to ensure that:

- Their behaviour is appropriate at all times.
- They observe the rules established for the safety and security of children, young people and vulnerable adults.
- They follow the procedures following suspicion, disclosure or allegation of abuse.
- They recognise the position of trust in which they have been placed.
- In every respect, the relationships they form with the children, young people and vulnerable adults are appropriate.

All LAA volunteers should follow the **CODE OF PRACTICE** below and advice laid out in the **LAA Yellow Card** (see Appendix 1). The card should wherever possible be made available to volunteers in advance of a planned activity. On the day of an event a copy of the **Yellow Card** should be given to each volunteer, read and carried by them for the duration.

CODE OF PRACTICE

- Be a good role model with behaviour and an attitude that are in line with our values.
- Comply with all applicable UK laws and guidance. If you are part of an activity outside the UK, you must also abide by the law of that country
- Ensure you follow LAA policies and procedures and re-read them from time to time as they may be amended
- Be responsible, fair and accountable in the way you perform your role
- Respect others' privacy.

- Communicate with others in an open and respectful way whether in person, by phone, writing or digital media
- Must not act fraudulently or dishonestly, or do anything which brings (or is likely to bring) the LAA into disrepute or have a negative impact on the LAA or its reputation.
- Volunteers should avoid situations where they are alone with a young person or vulnerable adult. This precaution protects all parties by removing the feeling of threat from an insecure participant, and by providing a witness if an accusation of improper behaviour is made.
- Physical contact between an individual and a volunteer or instructor should be avoided. There are instances when it is necessary, for example, to demonstrate a skill, but such contact should remain impersonal so there is no risk of it being misinterpreted.

What happens if someone doesn't follow the Code?

Where someone doesn't follow the Code it is referred to as a breach. If someone believes you have acted in a way that breaches this Code they are entitled to let the LAA know and the LAA will formally investigate using the following Procedures:

Procedures

UK legislation and best practice requires that in any activity involving children and vulnerable adults, a Children and Vulnerable Adults Officer (CVAO) should be nominated. In the case of LAA Strut events, this will be nominated locally. In LAA HQ activities, this role will be taken by either the CEO or another nominated individual.

All allegations or suspicions of abuse, no matter how insignificant they might seem or when/where they occur, must be referred to the CVAO immediately. No information must be withheld or filtered. Young people and vulnerable adults' welfare is always paramount.

If the CVAO receives allegations or suspicions of abuse they must follow the actions set down below at all times. These procedures enable us to fulfil our legal as well as our moral responsibilities.

If the CVAO is implicated in any way, the referral must **immediately** be made to the LAA CEO on **07967 381884**.

CVAO Actions are outlined on the following page.

CVAO ACTIONS

TO BE TAKEN AS SOON AS POSSIBLE FOLLOWING AN ALLEGATION OR SUSPICION OF ABUSE – ALWAYS WITHIN 24 HRS

1) Write down notes:

- Dates, times, facts, observations (verbatim speech if possible).
- Try to ensure that you have all relevant details recorded.
- No investigation or questioning is to be undertaken.

2) Contact LAA HQ and the CEO:

- Details of any complaints should be sent to: The Chief Executive. Light Aircraft Association. Turweston Aerodrome, Brackley, Northants. NN13 5YD. steve.slater@laa.uk.com
- LAA Policy requires that all allegations/suspicions will be referred immediately to statutory agencies. These will include the Local Safeguarding Children Board or Safeguarding Adults Board for the area of the event and the home area of the young or vulnerable person.

3) Follow advice from LAA HQ prepare a confidential file

- Take no further action unless advised to do so.
- Record all notes, all conversations and advice received.
- Ensure you date, time and sign your notes.

If a child or vulnerable person is at imminent risk of significant harm you should IMMEDIATELY contact the police by ringing 999.

- You should then follow the procedures; as detailed above.
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CVAO DO'S AND DON'TS

Do:

- Remain calm, approachable and receptive
- Listen carefully, without interrupting
- Acknowledge you understand how difficult this may be
- Make it clear that you are taking what is said seriously
- Reassure them that they have done the right thing in telling you
- Let them know that you'll do everything you can to help them
- Make a written record of exactly what has been said.

Don't:

- Promise confidentiality
- Ask leading or probing questions
- Investigate
- Repeatedly question or ask the complainant to repeat the disclosure
- Discuss the disclosure with people who do not need to know
- Delay in reporting the disclosure to the Safeguarding team.

Photography, video and audio recording at LAA events involving young or vulnerable people.

There have been concerns about the risks to children, young people and vulnerable adults when their images are used on websites (including on social networking sites and YouTube etc) and in publications but following a few simple guidelines (based upon those suggested by the NSPCC) will reduce the potential for concern.

- Avoid using both the name and the photograph of a child, young person or vulnerable adult in a publication or on a website.
- Seek permission from parent or guardian
- Only allow photographs to be taken of suitably dressed subjects and in appropriate situations
- Follow Young People First (the Yellow Card) at all times
- You should ask for the child, young person or vulnerable adult's permission to use their image. This ensures that they are aware of the way the image will be used. This does not need to be a formal permission form, an informal verbal agreement that explains what the photo will be of and how it will be used is sufficient.
- When photographs featuring young people are being taken specifically for use in advertising and/or promotional material, it is recommended that written consent is obtained using a specific release form.
- When a newspaper photographer is scheduled to attend an event involving young or vulnerable people it is recommended that consent using a permission process as above, is obtained in advance in order to avoid any confusion.
- External media companies will be keen to use full names. If you are being asked for more detailed information and they want the full name and age then it's acceptable to give it. Never provide the full address of the young person. For group photos you can ask media companies to use a collective term such as "Cub Scouts from the 6th Anywhere Air Scout Group".
- Photographs taken by press photographers that invade personal privacy are subject to the Independent Press Standards Organisation (IPSO) Code of Practice.

General Data Protection Act (GDPR)

The General Data Protection Act is unlikely to apply in the majority of LAA young peoples' activities and the fear of breaching the act should not be used to stop people from taking videos, photographs or audio, such as:

- Photographs, video and audio taken for personal use. For example photographs taken by parents of their daughter and her friends at an event would be for "personal use".
- Photographs taken and kept for official use, (for example for an identity card at an event) and stored (electronically or in hard copy) with other personal data, are likely to fall under the provisions of the GDPR.
- In most cases, even where the act applies, asking permission to take the photograph and storing that photograph (and the associated data) securely and appropriately would be enough to ensure compliance.



LAA Yellow Card - Code of Practice

To give positive guidance, this card sets out a code of behaviour for all adults involved in LAA activities. Every adult should have a copy of this code. It is designed so you can keep it with you at all times during LAA activities.

Check that:

- You have your own copy.
- All other adults involved in working with young people have a copy.
- Parents/Carers are made aware of the yellow card and our child protection policy.

Code of behaviour

- **Do** keep to this code at all times.
- **Do** treat everyone with dignity and respect.
- **Do** set an example for others to follow.
- **Do** plan activities that involve more than one other person being present, or at least within sight and hearing of others.
- **Do** treat all children, young people and vulnerable adults equally – do not show favouritism.
- **Do** respect children, young people and vulnerable adults' right to personal privacy.
- **Do** allow children, young people and vulnerable adults to talk about any concerns they may have.
- **Do** encourage others to challenge attitudes or behaviours they do not like.
- **Do** avoid situations where you are likely to be alone with a young person or vulnerable adult.
- **Do** make everyone aware of our safeguarding arrangements.
- **Do** remember this code at sensitive moments, eg when helping someone who has been bullied, bereaved or abused.
- **Do** tell other adults where you are and what you are doing.
- **Do** remember someone else might misinterpret your actions, even if you mean well.
- **Take any allegations or concerns of abuse seriously and refer them to your CVAO immediately.**

- **Do not** trivialise abuse.
- **Do not** form a relationship with a young person or vulnerable adult that is an abuse of trust.
- **Do not** drink alcohol when you are directly responsible for young people or vulnerable adults.
- **Do not** ever allow children or young people on LAA activities to drink alcohol.
- **Do not** allow abusive activities, eg initiation ceremonies or bullying.
- **Do not** take part in inappropriate behaviour or contact, whether physical, verbal or sexual.
- **Do not** take part in physical contact games with children, young people and vulnerable adults.
- **Do not** make suggestive remarks or threats to a young person or vulnerable adult, even in fun.
- **Do not** use inappropriate language when writing, phoning, emailing or using the internet.
- **Do not** let allegations, suspicions, or concerns about abuse go unreported.
- **Do not** rely just on your good name to protect you.

APPENDIX 2.

CEO ACTIONS IN EVENT OF A COMPLAINT OR ALLEGATION OF ABUSE

Any allegation should be forwarded to the CEO by a CVAO as soon as possible - always within 24hrs.

The CEO will make contact (telephone or direct) asap with the CVAO to discuss the allegation or suspicion and will additionally communicate the situation to the LAA Chairman, Secretary or other delegated Board member.

The CEO will refer the allegations/suspicions to statutory agencies such as the Local Safeguarding Children Board or Safeguarding Adults Board for the area of the event and the home area of the young or vulnerable person, and work upon the basis of any advice or guidance offered.

Written minutes will be made of any such discussions, and will be kept along with notes of all conversations and advice received, in a confidential file at LAA HQ.

Further Investigation and Actions

If an LAA member of staff is involved, investigation and actions will be carried out as specified in the LAA Staff Handbook.

If an LAA volunteer is involved, the CEO will after discussion with the complainant and if necessary the volunteer involved, make a decision as to the most appropriate way forward and whether a full investigation is required.

1. Full investigation not required:

The complaint will be logged and referred to the group or organising team's CVAO for further resolution, support or education. A report will be requested on progress within a 30 day period. The complaint can be referred back to the assessment stage if it remains unresolved. A formal letter of response will be prepared for both the complainant and the volunteer involved.

2. Full investigation required:

When a complaint requires an investigation it will progress to:

Step 1: Investigating the complaint

The complaint will be sent on to the CEO and another nominated Board Director, or Directors. The complainant and the volunteer involved will be contacted by the nominated investigator, confirming:

- That the complaint has been received.
- Indicating how they propose to deal with the matter.
- Giving an estimate of how long it will take to give a final response to the complaint.
- If a complaint is taking longer than anticipated to resolve, the complainant will be kept informed of this and told when to expect further contact. The investigator will make contact with the complainant at least once every 14 days unless agreed otherwise.

The amount of contact between the Investigator, complainant and volunteer will depend on the nature of the matters raised; the potential difficulties involved and the clarity of the information provided. If necessary, and at any stage of the investigation, a complainant or volunteer may be asked for further information.

Step 2: Carrying out the investigation

The CEO or other appointed investigator will assess how best to approach each investigation on a case-by-case basis. The Investigator must meet with or talk to the complainant individually, as well as the accused party and witnesses. The investigator will contact all relevant people who need to contribute to the investigation, to inform them of the investigation taking place and to explain their involvement.

The investigation will involve gathering all the relevant facts, including statements from witnesses and relevant documentary material. The Investigators will use this to form the basis of their decisions about the complaint, and where applicable (as outlined in step 3 below), writes a report of the investigation.

Any individual who is invited to attend a meeting to discuss a complaint has the right, if they so wish, to be accompanied by a colleague or a friend who is not involved in the complaint.

Step 3: Closing the complaint - collating and sharing findings.

The CEO, in conjunction with any delegated LAA Board member and the organising team's CVAO, will decide whether or not an investigation report is required.

Investigation report not required: Some complaints or feedback may be resolved by agreed action (verbal or written) between a complainant and the CEO without the need for any further investigation or written report to be produced. If this is a verbal agreement, the investigator will send a written follow-up to the complainant for reference. Any findings and outcomes will held by LAA HQ and may be shared with local Safeguarding Boards so that a copy of the complaint being closed is fully recorded.

Investigation report required: The CEO will contact all necessary parties in writing once the investigation has been completed; to inform of the investigation findings and of any action taken, or planned, as a result of the findings. Any findings and outcomes will be held by LAA HQ and may be shared with local Safeguarding Boards so that a copy of the complaint being closed is fully recorded. The complaint is then closed.

Action plans/outcomes: Complaint outcomes which fall within the scope of specific procedures, such as the managing concerns about adult volunteer behaviour or procedures, will be referred to the Board for further consideration.

Complaints appeals and review process: An appeals process will involve delegated LAA Board members reviewing the original investigation - including the information and evidence gathered to form the outcome; reviewing any sanctions applied and reinvestigating in the light of any new information.