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CAMPAIGN



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Safeguarding Children & Vulnerable Adults

POLICY & GUIDANCE

April 2019

How to use this Policy & Guidance

This document is in several parts. You only need to read the sections of the document that are relevant to you.

1. Policy Statement

All those covered by 2-6 below should read this to find out about the LCC' general policy on safeguarding children and vulnerable adults.

2. Guidance for LCC Trustees

Read this if you are an LCC trustee.

3. Guidance for LCC Staff

Read this if you are an LCC staff member.

4. Guidance for LCC Groups

Read this if you organise activities for an LCC Group, especially if children or vulnerable adults are likely to participate.

5. Guidance for LCC Ride leaders

Read this if you lead cycle rides and/or other activities for your Group.

6. Guidance for Participants

Read this if you are under 18 or a vulnerable adult planning to attend a LCC cycling or other activity, or if you are a parent, guardian or carer.

I. Policy Statement

LCC provides activities for its own members and volunteers; members, staff, volunteers and service users of other organisations; and to the public. These groups may sometimes include children and young people under the age of 18, and adults who may be particularly vulnerable.

We are committed to ensuring the well-being of everyone who participates in LCC activities and will take every practical step to minimise the risk of harm, paying particular attention to the needs of those who are most vulnerable, including children and vulnerable adults.

We are also committed to supporting fully our volunteers and staff in their work to deliver our charitable aims and strategic objectives, including protecting them from potential liabilities and false suspicions and allegations of abuse.

I.1 Who are children and vulnerable adults?

In this document, a **child** is anyone under the age of 18 years old, as defined by relevant legislation.

A **vulnerable adult** is someone of 18 years or older who is unable to care independently for themselves. This might include people who:

- Have a physical disability, illness or injury, or are severely frail though old age
- Are experiencing mental health issues including dementia, or have learning disabilities
- Are in need of community care
- Are unable to protect themselves from harm, through domestic violence or substance addiction.

I.2 Welcoming children and vulnerable adults

LCC helps everyone enjoy cycling. We welcome children and vulnerable adults on all activities that are suitable for them as individuals. We are committed to equal opportunities and diversity and aim to treat everyone with dignity and respect, and not to discriminate on grounds of age, disability,

ethnicity, race, sex (gender), sexual orientation, gender reassignment, religion or belief or non-belief, marriage or civil partnership, or pregnancy or maternity.

While we are the experts at providing and supporting cycling activities, we are not able to provide specialist care and support for people who have special needs or who are unable to care independently for themselves, or to take special responsibility for looking after children and young people under the age of 18.

- We will only accept children under the age of 18 on activities when they are accompanied by a parent, legal guardian or other person with equivalent responsibility for them such as a teacher or youth worker.
- We will only accept adults who cannot care for themselves independently if accompanied by a carer or support worker to assist with their everyday needs. In the case of activities aimed at LCC members, if a person with special needs is a member, we do not expect their carer or support worker to be a member too.

Participation in all activities is subject to their suitability for individual participants. LCC activity leaders have an enhanced duty of care towards participants, and sometimes need to make judgements that take into account the safety and enjoyment of everyone involved in an activity. They have a right to refuse a participant if in the leader's opinion this would result in danger to the individual, or danger or major disruption to the rest of the group. We will strive to make such judgements on a fair and practical basis, without making stereotypical or unwarranted assumptions.

1.3 Who is responsible?

Everyone helping the LCC run its activities is responsible for providing children and vulnerable adults with appropriate safety and protection. This includes:

- 1 Members of staff, both practically when working with children and vulnerable adults and in ensuring management practices, procedures and guidance are in place to ensure children and vulnerable adults are protected.

- 2 Volunteers, including those in LCC Groups who organise and deliver activities where children and vulnerable adults are likely to participate.
- 3 Trustees, who are expected to ensure the LCC complies with the law and that LCC policies and objectives are implemented as effectively as possible.

1.4 What we will do

We will take all reasonable measures to protect the welfare of children and vulnerable adults involved with LCC activities and minimise their risk of harm by:

- 1 Having appropriate safeguarding procedures and practices in place, tailored to the organisation's needs, and striving to ensure they are implemented.
- 2 Producing practical and appropriate guidance for the participants, volunteers and staff on our procedures, and ensuring it is easily available and publicised.
- 3 Working closely with appropriate partner agencies.
- 4 Referring any concerns promptly to the appropriate authorities.

1.5 Updates and revisions

The LCC safeguarding policy, procedures and guidelines will be reviewed on a regular basis. They are subject to change at any time, based on updated legislation and feedback regarding best practice

2. Guidance for LCC Trustees

The policy and guidance set out in this document has been approved by the Board. Trustees should review this document yearly and must satisfy themselves that it remains appropriate. Any changes made to this document to ensure it remains appropriate must be approved by the Board.

2.1 Responsibilities of Trustees

The [Charity Commission guidance](#) on safeguarding tells trustees that:

“Protecting people and safeguarding responsibilities should be a governance priority for all charities. As part of fulfilling your trustee duties, you must take reasonable steps to protect people who come into contact with your charity from harm.”

This is an individual, legal responsibility for all trustees even if the operational application of LCC’s Policy & Guidance is delegated to staff through the CEO. **This document should be read in conjunction with the Charity Commission guidance, with which trustees must comply.**

Trustees shall also ensure (through the CEO and staff as needed) that LCC Groups and leaders of LCC cycle rides are informed of this Policy & Guidance and take note of it.

The Board shall ensure it stays abreast of relevant legal and regulatory changes, and of relevant new guidance (e.g. from the Charity Commission), and shall take proper account of these when revising this Policy & Guidance.

Any trustee who believes that this Policy & Guidance is not being properly observed, or that an unreported incident has occurred, or that the charity is otherwise at risk of not meeting its safeguarding obligations, must report this immediately to the CEO and Chair of the Board.

2.2 Communicating this guidance

It is the responsibility of trustees to ensure this guidance is communicated to all relevant parties, even if this is in practice delegated to staff via the CEO, and to take all reasonable steps to ensure it is complied with.

2.3 Reporting Serious Incidents

The Charity Commission defines what constitutes a serious incident. **Trustees required to report serious incidents to the [Charity Commission](#).**

3. Guidance for LCC Staff

3.1 Reporting incidents and keeping a register

The guidance given in this document for LCC Groups and LCC Ride Leaders also applies to activities run by LCC staff. All staff running LCC activities should therefore read and comply with that guidance.

If an incident occurs then it should be reported **immediately** to the **LCC Safeguarding Officer** who shall also inform the CEO.

The CEO shall make sure a **register of all reported incidents** is kept and **notify the Board of trustees** at each meeting of any incidents that have occurred since the previous meeting. This register shall also record how each matter was handled.

The CEO will immediately inform the Chair of the Board of Trustees if a **serious incident** has occurred and how it is being handled.

3.2 Running activities with unaccompanied children or vulnerable adults

The Board may from time to time give permission to the CEO for activities to be conducted under the supervision of staff that involve **unaccompanied children or unaccompanied vulnerable adults** (these may or may not be in partnership with other bodies, such as schools or youth organisations). **Permission to do so shall be given only on the basis that the Board is satisfied that relevant and appropriate safeguarding policies and procedures are in place to cover these activities.**

The **CEO shall be responsible making the request** to the Chair for such activities to be run. Staff shall not conduct such activities unless instructed by the CEO on the basis that permission has been given by the Board.

4. Guidance for LCC Groups

It is useful to read the Guidance for Participants (below) and the Guidance for LCC Ride Leaders (below) in conjunction with this section.

4.1 Who should read this guidance

Volunteers involved in organising activities specifically targeted at families/children and vulnerable adults, or where children or vulnerable adults regularly attend, should be familiar with this guidance and ensure it is implemented. Coordinators and organisers in Groups and that don't run targeted activities should still be aware of the contents of this guidance and be prepared to implement it.

4.2 Why we need this guidance

LCC provides activities for a wide range of people. We have a duty of care to ensure the well-being of everyone who participates in them and to minimise the risk of harm, and a moral duty as well as a legal and an insurance obligation to safeguard those who are particularly vulnerable, including children and vulnerable adults. Our partner organisations and funders require us to demonstrate that we have appropriate policies and procedures in place. And it is vital we support fully our volunteers and staff, including protecting them from potential liabilities and false suspicions and allegations of abuse.

4.3 General principles

We help everyone enjoy cycling, including children and vulnerable adults. We are committed to equal opportunities and diversity and aim to treat everyone with dignity and respect, and not to discriminate on grounds of age, disability, ethnicity, race, sex (gender), sexual orientation, gender reassignment, religion or belief, marriage or civil partnership, or pregnancy or maternity.

While we are the experts at providing and supporting cycling activities, we can't provide specialist care, supervision or support for children and for those who are unable to care independently for themselves. Children under 18 and those with special needs must be accompanied by others who take responsibility for meeting their needs.

It is important to ensure that volunteers don't work unsupervised on a regular basis with unaccompanied children and young people under 18 and/or with vulnerable adults.

Otherwise our activities might be classified by law as ‘regulated activities’ and the people organising them will require enhanced background checks to establish that they are not barred from working in this way. Organisations which knowingly allow barred people to work on regulated activities are breaking the law.

Participation in all activities is subject to their suitability for individual participants. Leaders of cycling and other activities sometimes need to make judgements that take into account the safety and enjoyment of everyone involved in an activity. So long as a judgement is not based on stereotypical assumption or prejudice, they are well within their rights to refuse a participant if they believe this would result in danger to the individual or danger or major disruption to the rest of the group.

It is also not our responsibility to investigate or intervene in suspected cases of abuse or ill treatment, but it **is** our responsibility to refer such cases to the appropriate authorities, and to recognise that as organisers and leaders of activities in a position of trust, we may be made aware of signs of abuse, or even have it disclosed to us.

When organising activities:

- 1 Ensure that, when promoting activities, you help potential participants judge their suitability by including details such as cycling length, pace, grade/difficulty, and advice on matters such as clothing, footwear and equipment required. Give contact details for more information and be prepared to discuss this in more detail with individual enquirers. Try to refer to other organisations more suitable for an enquirer’s needs where necessary.
- 2 If working with other organisations who work with children or vulnerable adults (for example schools or community groups), make clear from the outset in writing that they are responsible for the supervision and support of their participants.
- 3 Inform people at the start of an activity what to expect, and be prepared to turn away those they consider ill-equipped or not capable of doing the activity, so long as their decision is based on practicalities and not stereotypical or prejudiced assumptions.

- 4 Arrange for extra volunteers on activities aimed at children or people with special needs, to ensure there is cover in case of accident or illness.
- 5 Always report incidents promptly and correctly using the standard [LCC incident report form](#).
- 6 Be sensitive about taking photos and films of activities. Ask the participants first if anyone would prefer not to be featured, and respect their wishes. You should use a [photo consent form](#). If working with schools or organisations dealing with children or vulnerable adults, abide by any policies they have about written permission.
- 7 Consider including cycle activities in your programme that are accessible to a wide range of people. For more information, see our [ride leader training](#).

4.4 Welcoming children and young people

Children under 18 must be accompanied by an adult with parental responsibility, such as a parent, legal guardian, carer, teacher or youth worker. LCC volunteers cannot provide direct care and supervision to people under 18.

LCC is no longer able to accept unaccompanied young people aged 15-17 on LCC activities, even with written consent from a parent or guardian. We are responsible for ensuring that accompanying adults are aware of their responsibility for supervision and direct care. This is particularly important when participants are not already well-known to the Group.

- 1 Include a statement in your programmes and publicity, for example: “Cycle riders must be 18+ or accompanied by a responsible adult”.
- 2 If working with a school or youth organisation bringing people under 18, make clear to the organisation that they must provide sufficient supervising adults who will take responsibility for the children and young people.
- 3 Where accompanied under 18s are present on a cycling or other LCC activity, the organiser should remind the group before the start of the activity that LCC volunteers are not responsible for their direct care and supervision.

- 4 If you use a signing in form or register, consider including a tick box for responsible adults to confirm they understand their responsibilities.
- 5 Don't be afraid or embarrassed to ask for proof of age if you think it necessary.
- 6 If an unaccompanied person is under 18, it is best for everyone that they do not participate in the activity. Do your best to ensure that they are safe, for example by asking for a contact number and making arrangements with a parent or guardian. Under special circumstances, for example, if you are far from the young person's home and no-one else is available to ensure they can get home safely, you may choose to include them as a one off. In this case:
 - Keep a close eye on the young person and check they are accounted for throughout the activity.
 - Keep a note, and complete the [incident report form](#).
 - Make sure that the young person and their parent or guardian are aware that they will need to be accompanied in future.

4.5 Welcoming vulnerable adults

A vulnerable adult is someone 18 or over who is unable to care independently for themselves. This could be due to a physical or learning disability, illness or injury or mental health issues; old age; substance addiction; domestic violence or abuse or other reasons. It can be a temporary or a permanent condition.

LCC volunteers cannot provide direct care to anyone with special needs. We ask for a carer or support worker to accompany them if necessary. We encourage people with special needs to contact leaders or organisers beforehand to discuss suitability of activities.

Note that providing care for adults with special needs is generally classified by law as a 'regulated activity' and organisations must take special precautions before permitting individuals to provide it (see under General Principles above).

- 1 Make sure the carer or support worker knows they are responsible for the direct needs of the person they're accompanying.
- 2 Take a note of an emergency contact number and any important medical details that can be passed to the emergency services if required.
- 3 It can be difficult to identify levels of independence, and these may change over time. For example, an individual who has been attending activities on a regular basis may experience deteriorating physical or mental health. If you have concerns and feel they should be accompanied by a carer, you can seek advice from the LCC safeguarding officer and could ask them tactfully and discreetly to arrange to bring along a carer in future.
- 4 Carers and support workers accompanying vulnerable adults on activities intended primarily for members are not required to be members themselves.

4.6 Concerns about abuse

Your Group may typically have little contact with children or vulnerable adults, so it is unlikely volunteers will encounter concerns about abuse. However, if you regularly welcome children and vulnerable adults, though abuse remains thankfully rare, it is possible you may have concerns from your own observations of participants, or have such concerns raised with you. As a trusted adult, you may even have abuse disclosed to you by a victim. Abuse can include not only physical and sexual abuse but also emotional abuse and neglect. Vulnerable adults can also be at risk of financial exploitation or may come to harm through self-neglect or their own behaviour.

- 1 If anyone is under serious threat of physical harm or in need of urgent treatment during a LCC activity:
 - **Dial 999 immediately** and ask for the **police**, if a criminal offence is being or is likely to be committed, and/or **ambulance** in cases of medical need.
 - When it is safe to do so, make notes of the incident and its outcome, fill in an **incident report form** and return to LCC central office.

- If there is an issue of violence or abuse, be prepared to answer further questions from the police and/or the local authority. Contact the safeguarding officer (safeguarding@lcc.org.uk or 020 7234 9310) for advice and support, and see also Appendix 1.
- 2 If there is no immediate danger but you have a suspicion or concern that abuse is taking place or when an allegation of abuse has been made:
- Make a note of your concerns as soon as possible, within an hour of any incident if you can.
 - Contact the local authority's children and family services team (see contacts). They may ask for a written report and will advise what should be in it.
 - Fill in an **incident report form** and return to LCC central office attaching a copy of any written report made to the local authority. Don't record personal details of people involved on the report form..

The LCC safeguarding officer is here to support and guide you throughout this process. Please contact them if you need assistance.

3 Generally:

- When working with children and vulnerable adults, be sensible and self-aware, and avoid placing yourself into situations where your actions may be misinterpreted. Avoid agreeing to supervise a child or vulnerable adult while a parent or carer is absent especially if this means being left alone with them.
- If someone discloses abuse to you, be sympathetic and supportive, but don't agree to keep confidences. Explain it is your duty to pass on information appropriately.
- Keep concerns confidential. Only share details as necessary with trusted senior volunteers and staff and the appropriate authorities.

- Don't risk putting yourself in difficulty or danger by attempting to investigate the case yourself or to challenge the alleged abuser.

4.7 Summary

- 1 Be familiar with this guidance and ready to explain it to cycling/activity leaders.
- 2 Ensure publicity helps people judge the suitability of an activity.
- 3 Communicate our policy that children and young people under 18 must be accompanied by an adult with parental responsibility.
- 4 Be prepared to discuss the suitability of an activity with enquirers, and ensure people with special needs know they must be accompanied by someone responsible for their direct care. Carers don't have to be LCC members.
- 5 Enlist extra volunteers on activities specifically aimed at children and people with special needs.
- 6 Know how to get hold of the contact details for your local authority Child and Family services.
- 7 Ensure incident reports are completed correctly and promptly.
- 8 Support leaders in dealing with concerns about abuse, keep appropriate contact details and ensure incidents and referrals are reported to staff promptly and accurately.

4.8 Useful contacts

- **Emergency:** Police/Ambulance telephone 999
- **LCC safeguarding officer:** email safeguarding@lcc.org.uk or call 020 7234 9310.
- **LCC insurance and other toolkits.** <https://lcc.org.uk/pages/activism>.
- **Local authority child and family services.** Contact the County or unitary council and ask for child and family services. See the phone book or www.gov.uk which has a list of all councils in the UK. They normally have out- of-hours emergency contacts.

- **Police** (non-emergency calls). England 0300 123 1212
- **NSPCC helpline** telephone 0808 800 5000, www.nspcc.org.uk/helpline

5. Guidance for LCC Ride Leaders

The LCC helps everyone enjoy cycling. We welcome children, young people under 18 and vulnerable adults on all activities that are suitable for them as individuals, so long as they are accompanied.

Be aware that:

- Everyone under 18 must be accompanied by an adult with parental responsibility.
- People with special needs must be accompanied by someone responsible for their direct care (who needn't be a LCC member).

At the start of an activity:

- Inform people what to expect
- Say that people with medical concerns can raise them discreetly and confidentially with you. If they do, take a note of emergency contact numbers or vital medical details that could be of use to the emergency services.
- Remind adults accompanying children and young people of their responsibility for direct care and supervision. Remind carers of their responsibilities.

- So long as a judgement is not based on stereotypical assumption or prejudice, don't be afraid to exclude people for whom you believe the activity to be unsuitable; or if their participation would result in danger to the individual or danger or major disruption to the rest of the group.

During the activity:

- If anyone is under serious threat of physical harm or in need of urgent treatment dial 999 and ask for the police and/or ambulance as appropriate.
- Be sensible and self-aware. Avoid placing yourself into situations where your actions may be misinterpreted.

After the activity:

- If an incident has occurred, please complete the [incident report form](#) and return it to the LCC office.

6. Guidance for Participants

We are committed to ensuring the well-being of everyone who participates in LCC activities and will take every practical step to minimise the risk of harm, paying particular attention to the needs of those who are most vulnerable, including children and vulnerable adults. We are also committed to supporting our hardworking volunteers and staff who help deliver our charitable aims.

Please help us by reading and observing the following guidance. It is particularly relevant to children and young people; their parents, guardians and carers; vulnerable adults and others with special needs; and their carers and support workers.

We help everyone enjoy cycling. We are committed to equal opportunities and diversity and aim to treat everyone with dignity and respect, and not to discriminate on grounds of age, disability, ethnicity, race, sex (gender), sexual orientation, gender reassignment, religion or belief or non-belief, marriage or civil partnership, or pregnancy or maternity.

Everyone is welcome to participate in our activities, so long as the activity is practically appropriate for a particular individual. However we are unable to provide specialist care and support for those that need it. We are also unable to accept responsibility for children under 18, who must be accompanied by a responsible adult.

When attending LCC activities:

- 1 Check that an activity is appropriate for you before turning up. Group cycling listings usually include an indication of length, pace and difficulty so check this carefully, and follow any advice about clothing and equipment. If in doubt, contact the organisers in advance.
- 2 If you are under 18, you will need to be accompanied by a responsible adult when participating in activities, such as your parent, legal guardian, carer, teacher or youth worker.
- 3 If you are under 18 and are participating in activities using tools, such as biking maintenance, you must be supervised at all times by a parent, guardian or responsible adult.
- 4 Please do not be offended if asked for proof of age.
- 5 If you are a responsible adult accompanying children or young people under 18, be aware that you are responsible for their direct care and supervision, and that this is not the responsibility of LCC staff and volunteers.
- 6 If you are an adult who is unable for whatever reason to care for themselves independently, or needs specific help in order to participate in an activity safely (for example because of an illness or disability), you must be accompanied by another adult such as a carer or support worker who takes responsibility for your care. If you are a LCC member and the activity is aimed at members, there is no need for your carer or support worker to be a member too.

- 7 If you are a carer or support worker accompanying someone who is unable to care for themselves independently or who needs special assistance, please be aware you are responsible for their direct care and/or special assistance, and that this is not the responsibility of LCC staff and volunteers.
- 8 Please tell the cycling leader or organiser discreetly and in confidence about any medical conditions that may affect your ability or that of the people in your care to participate safely.
- 9 Before and during the activity, please follow the advice of the leader or organiser. Leaders have to take responsibility for everyone's safety and enjoyment, and can refuse to accept people who in their judgement may place themselves or the group in danger, or seriously disrupt the activity, so long as a judgement is not based on stereotypical assumption or prejudice.
- 10 If you have any concerns about the behaviour of anyone participating in an activity, such as abusive, threatening or inappropriate behaviour, raise this discreetly with the cycling leader. If you have concerns that a child or vulnerable person is being placed in danger or abused, you can raise this with your local authority, the NSPCC helpline (in the case of children, tel 0808 800 5000, www.nspcc.org.uk/helpline) and/or the LCC safeguarding officer (safeguarding@lcc.org.uk or call 020 7234 9310). If you suspect that anyone is ever in immediate danger call the police.
- 11 Everyone under 18 must be accompanied by a responsible adult when participating in LCC activities.

APPENDIX - Questions when referring concerns about abuse

The questions are likely to be asked by the local authority should you refer a concern about abuse to them. You may find it helpful to consider them when making notes or a referral. Keep any written documents containing personal details strictly confidential and store them in a safe place. LCC staff are here to support you. If you need any guidance, please get in touch with the safeguarding officer.

- 1 Your name, role and contact details.
- 2 The organisation's name and contact details.
- 3 Child or vulnerable adult's name, age/date of birth (estimated if unknown) and contact details.
- 4 Whether or not you are reporting concerns on behalf of someone else.
- 5 A brief description of what prompted the concerns, including dates, times and other specific factors, making a clear distinction between fact, opinion and hearsay, including:
 - Any visible bruising or injuries.
 - Any indirect signs such as behavioural changes.
 - The child or vulnerable adult's account of any signs or injuries, if any.
 - Whether the child or vulnerable adult has been spoken to directly, and their account of any signs or injuries, or any disclosures.
 - Any contact with parents/carers or support workers including:
 - Their names and contact details.
 - Times and dates of discussion.
 - What was said.
 - Has anyone been alleged to be the abuser? Give further details.
 - Where and when do you suspect the abuse to have taken place? Was it on your activity or elsewhere?
 - Is anyone else involved and have they been contacted? Are there any witnesses?
 - Their names and contact details.
 - Times and dates of discussion.
 - What was said.