

**Rotary**  
Great Britain & Ireland



**Rotary International  
in Great Britain & Ireland**

# **Safeguarding Guidance**

## **2021/22**

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# The Rotary International in Great Britain & Ireland

## Safeguarding Guidance

### Introduction

#### Compliance

The aim of this guidance document is to support the Rotary International in Great Britain & Ireland (Rotary GB&I/RIBI) Safeguarding Policy (Children) and Safeguarding Policy (Vulnerable Adults) and to give a brief overview of Safeguarding together with information on specific activities. The Rotary GB&I Safeguarding Policies are available online and are not part of this supporting guidance document. The Safeguarding Policy is one of three policies under the heading of 'Compliance' which also includes the Health & Safety Policy and the Equality & Diversity Policy.

The Constitution of Rotary GB&I provides that every club in the Area (Great Britain, Ireland, the Channel Islands and the Isle of Man) is bound in all things, not contrary to law, by the Constitution and the By-Laws of the Association and shall observe the provisions thereof.

It goes without saying that clubs are also bound by the general law of the jurisdiction within which that club is located. Rotary GB&I does not seek to advise clubs on matters of general law, but does try to help clubs to ensure that they comply with certain specific legal frameworks which are likely to apply to the regular activities of all or most clubs and the policies and this guidance document have been compiled with this in mind.

Clubs and districts are recommended to adopt the three Compliance policies. Adherence to these policies should ensure that no club inadvertently finds itself in breach of these areas of general law.

The three Compliance policies should be discussed and adopted at district and club level and the combined [Compliance Statement](#) endorsing this should be signed and returned as appropriate, i.e. the Club Compliance Statement should be signed by the Club President (or Secretary) on behalf of the club and returned to the District Secretary; the District Compliance Statement should be signed by the District Governor and the District Secretary and returned to the Rotary GB&I Support Centre office.

### Who are we setting out to protect?

We need to protect three groups of people: children and vulnerable adults from abuse and, to a lesser extent, ourselves from misunderstandings and from failing to follow guidelines.

#### Children

Section 60 of the Safeguarding Vulnerable Groups Act 2006 defines a child as "a person who has not attained the age of 18". (In Scotland for some purposes adulthood is reached at the age of 17; for the purposes of safeguarding the age is 18). It is our duty to ensure that children should be protected while they are in our care. It is our further duty to know what to do if children who come into our care, even if only temporarily, show signs of having been abused (please see Appendix I: Forms and signs of abuse, and Appendix J: Dealing with complaints, accusations and whistleblowing).

#### Vulnerable adults

The term 'vulnerable adult' has been amended as it was felt to be inappropriate to label an adult as vulnerable solely due to their circumstances, age or disability. In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving one of the following services:

- Health care
- Relevant personal care
- Social care work

- Assistance in relation to general household matters by reason of age, illness or disability
- Relevant assistance in the conduct of their own affairs; or
- Conveying (due to age, illness or disability in prescribed circumstances)

### **Rotarians and their helpers**

Rotarians rely on many friends, family members and other volunteers to help with giving service to others. Such service, particularly with children or with the vulnerable, must be carefully planned; codes of behaviour laid down and all involved should have a clear understanding of their roles responsibilities and duties.

Care should be taken to avoid being alone with a child or a vulnerable adult. Be particularly aware of this in residential situations. The subject is covered comprehensively in Appendix G: Safeguarding requirements for specific Rotary activities – Youth Exchange and related activities.

### **Rights of the child and the vulnerable adult**

Children have rights that should be demonstrated in our work. Every child has the right to:

- Be safe.
- Protect their bodies.
- Say no.
- Get help against bullies.
- Tell what frightens or confuses them.
- Be believed.
- Reveal 'secrets' if those are disturbing to the child.

These universal rights are fundamental to all work with children. They apply equally to work with vulnerable adults.

### **What are we protecting them from?**

Abuse of children or vulnerable adults is often interpreted as being confined to sexual abuse, but that is only one manifestation. It can also take the form of:

#### **Physical abuse**

When a person hurts, injures or bullies a child or vulnerable adult, gives inappropriate drugs or alcohol or fails to act to prevent harm.

#### **Emotional abuse**

Persistent or severe; emotional ill treatment that has or is likely have a serious effect on a child or vulnerable adult's development. This includes negative discrimination such as bullying.

#### **Neglect**

The failure to provide adequate food, health care, clothing, care and education.

#### **Sexual abuse**

When someone exerts power, authority or position to gratify their own sexual needs.

#### **Financial abuse**

May become apparent when working with vulnerable adults. This is where the person is deprived of the money that is rightfully theirs: it may be theft, fraud, forgery or embezzlement.

The effects of abuse are wide-ranging and profound, varying according to the type of abuse and the length of time it has been endured. It can lead to problems of health, behaviour, mental health, education and drug and alcohol misuse. It can lead to self harm, suicide attempts and in extreme cases, death. (Details are given in Appendix I: Forms and signs of abuse).

In activities in which Rotarians are involved, Safeguarding procedures must endeavour to ensure that the possibility of abuse of any kind is risk assessed out. There is also the need to 'know what to do' if Rotarians suspect that abuse is taking place outside a Rotary activity but made evident by the children or the vulnerable with whom we work. There need to be strong arrangements to deal with complaints; expressions of concern; allegations or "whistle-blowing" (see Appendix J: Dealing with complaints, accusations and whistle-blowing).

## **Applicability of this document (England, Wales, Scotland, N. Ireland, Rep. Ireland)**

The general guidance given in this document refers to Rotary GB&I as a whole, though the detailed arrangements for criminal record checks differ across the countries within Rotary GB&I.

In England and Wales these checks are carried out by the Disclosure and Barring Service (DBS). For simplicity, the term 'DBS' should be understood to include the services provided by [Disclosure Scotland](#), [AccessNI](#) (Northern Ireland) and [Garda Siochana](#) (Eire/Republic of Ireland). Details of procedural differences will be given to clubs direct from the districts concerned. **There is a separate document, available to download from the Rotary GB&I website, addressing procedural matters for Scotland together with contact details for clubs in Scotland and this should be read in conjunction with the Rotary GB&I Safeguarding Policies and Safeguarding Guidance manual (Appendix N: Safeguarding Guidance Supplement for Scotland).**

## **General background**

Rotary clubs have been providing service to children and vulnerable adults in many settings for over a century, but the climate in society has changed considerably over that time. There is recognition of the moral and legal responsibility to safeguard children and vulnerable adults. There is a need to demonstrate that an organisation such as Rotary is doing everything possible to protect those with whom they work. It is important that Rotarians plan and provide service to the community in such a manner that the reputation and interests of Rotary or of individual Rotarians cannot be brought into question.

## **Criminal record checks**

An aspect of the arrangements for the safeguarding of children and vulnerable adults is the establishment of processes to meet the legal requirement to carry out criminal record checks, also known as 'Disclosures' as part of the selection of people to work with children and the vulnerable (Please see section 'Disclosure & Barring Service checks – Process and procedures'). These are the disclosed results of checks, whether or not a criminal record is found. Checks are obligatory for some Rotary activities and projects which provide service to children and vulnerable adults on a regular basis.

## **Safe practice**

All policies and procedures must be seen in the wider context of safe practice. For completeness the full document also includes information on such matters as:

- Risk assessment (Appendix C: Risk assessment).
- Insurance and legal arrangements (Appendix H: Insurance and legal arrangements).
- Working in partnership with parents, carers, children and vulnerable adults (Appendix D: Involving parents, carers, children and vulnerable adults as partners).

Please be aware that planning must also take into account:

- Health & Safety regulations and the [Club/District Health & Safety Policy](#), together with the publication, '[Rotary GB&I Health & Safety Guidance](#)'.
- Traffic regulations.
- Food hygiene regulations.

Everyone has the right to have fun, feel secure and be protected when participating in a Rotary event. That is why these matters are important.

## Rotary GB&I Safeguarding Policy

This declaration of policy applies to the whole of Rotary GB&I although the legislative framework may differ in its constituent parts.

Rotary International in Great Britain and Ireland has adopted this statement of policy in its work with children, the elderly, the vulnerable and those with disability.

- The needs and rights of the child, the elderly, the vulnerable and persons with disability take priority.
- It is the duty of every Rotarian to safeguard to the best of their ability, the welfare and prevent the assault, physical, sexual or emotional abuse and neglect of all children, the elderly, persons with disability or otherwise vulnerable persons with whom they come into contact during their Rotary duties.

Rotary GB&I will endeavour to ensure safeguarding by:

- Actively encouraging a climate through which safeguarding issues are regarded as an essential part of Rotary activities and events.
- Actively encouraging the appointment of Rotarians with responsibility for safeguarding issues in each Rotary district and in each Rotary club.
- Adopting safeguarding guidelines that give clear procedures and a code of conduct for Rotary districts, Rotary clubs, Rotarians, staff and other helpers and associated volunteers.
- Planning all events and activities so that safeguarding issues are properly addressed.
- Sharing information on safeguarding and good practice with children, parents and carers, Rotarians, staff, helpers and associated volunteers.
- Issuing guidelines on how to deal with the Disclosure or discovery of abuse and sharing information about concerns with agencies that need to know.
- Providing appropriate training for Rotarians, staff, helpers and associated volunteers in the processes and procedures of child and vulnerable adult safeguarding.
- Following carefully the procedures for the recruitment and selection of Rotarians, staff, helpers and associated volunteers to assist with projects and activities.
- Monitoring and reviewing this policy and the associated procedures on a regular basis.

The [Safeguarding Policy for Children](#) and [Safeguarding Policy for Vulnerable Adults](#) for districts and clubs to adopt are available on the website.

# **The Safeguarding of Children and Vulnerable Adults**

## **Creating the right climate**

The Safeguarding of Children and Venerable Adults policies are designed to actively encourage a climate through which safeguarding issues are regarded as an essential part of Rotary activities and events.

Although Rotary GB&I is not specifically a children's charity, it acknowledges the growing extent of youth activity, development of youth services, children's contact and involvement in the work of Rotary Clubs. It recognises its moral and legal responsibility to safeguard children and vulnerable adults. More than that, it recognises that children have the right to have fun and be protected through the work of Rotary and that parents have a right to feel safe when entrusting their children to the care of Rotary.

There have been incidents of sexual abuse, where abusers have identified and infiltrated organisations where a relative lack of scrutiny has been an attraction. Research has shown that many voluntary groups cover up abuse to protect the organisation's reputation.

Similar concerns apply to dealing with vulnerable adults, when the same principles are relevant.

It is understandably easy to take the view that 'all this regulation is just too much' and give up a particular activity. That may be the considered and sensible decision in a very few instances. However, in the vast majority of cases, an enormous variety of worthwhile activities continue to be offered. There is also a tendency to think that 'this does not apply to Rotary'; that must be resisted.

## **Steps taken by Rotary GB&I**

- Appointing a Rotary GB&I Compliance Officer to be responsible for managing compliance issues throughout Rotary GB&I.
- Requiring each District or a group of Districts to appoint an officer with responsibility for safeguarding and compliance issues: the District Safeguarding Officer.
- Requiring each Club or group of Clubs to appoint a Club Safeguarding Officer.
- Holding training events for District Safeguarding Officers.
- Regularly updating guidance to Districts and Clubs.

## **Practical steps that are expected of each District**

- To appoint an officer with responsibility for safeguarding issues, failing which the District Governor will fulfil the role of the District Safeguarding Officer.
- To provide support, training and advice to each Rotary Club.
- To administer the system of criminal record checks on behalf of the Clubs in the District.
- To provide information on recommended speakers for Clubs in the locality.

## **Practical steps that are expected of each Club**

- To appoint a Rotarian, failing which the Club President will fulfil the role: perhaps assisted by a small group of Rotarians, to assume the responsibility for the examination, implementation and ongoing review of the safeguarding policy and its implementation: the Club Safeguarding Officer.
- To include child and vulnerable adult safeguarding awareness training within the Club's annual programme.
- To attend District training events.

- To invite speakers on these issues. For example on children's issues: National Society for the Prevention of Cruelty to Children, local head teacher or a member of the local child safeguarding panel, and on vulnerable adult issues: Age UK, or the manager of a local nursing home.
- To work in partnership with other organisations.
- To demonstrate mutual respect between Rotarians, volunteers and with those whom we work and to provide a model of appropriate behaviour.



## **Role and responsibilities**

### **Rotary GB&I Compliance Officer**

The post holder will have the main responsibility for managing Child and Vulnerable Adult Safeguarding issues throughout Rotary GB&I (as well as Health & Safety, and Equality & Diversity), and will:

- Implement and promote Rotary GB&I's Child and Vulnerable Adult Safeguarding policies and related guidance and procedures.
- Regularly report to the Executive Committee through the General Secretary.
- Act as the main contact for Rotary GB&I for the safeguarding of children and vulnerable adults.
- Provide information and advice on the safeguarding of children and vulnerable adults.
- Support and raise awareness of the safeguarding of children and vulnerable adults.
- Communicate with District Safeguarding Officers and, through them, to Rotarians throughout Rotary GB&I on issues of child and vulnerable adult safeguarding.
- Keep abreast of developments and understand the latest information on data safeguarding, confidentiality and other legal issues that impact on the safeguarding of children and vulnerable adults.
- Encourage good practice and support of procedures to protect children and vulnerable adults.
- Establish and maintain contact with relevant statutory agencies.
- Maintain confidential records of reported cases, the action taken and, where necessary, liaise with the statutory agencies involved in any allegation to ensure that they have access to all necessary information.
- Organise training for District Safeguarding Officers.
- Regularly monitor and review Rotary GB&I Child and Vulnerable Adult Safeguarding Policies and Procedures.

The Rotary GB&I Compliance Officer is: -  
Rotarian Peter King (Rotary Club of Kew Gardens, D1145)

### **District Safeguarding Officer (DSO)**

Each District should appoint a Safeguarding Officer, failing which the District Governor will fulfil this role. Ideally, that person should have some background and familiarity with child and vulnerable adult safeguarding issues. Additional training is provided by Rotary GB&I.

#### **Role and responsibilities**

- Ensure the District signs the Compliance Confirmation Form
- Implement, promote and manage safeguarding issues throughout the District.
- Report to the District Council and its Executive committee.
- Maintain contact with the Rotary GB&I Compliance Officer.
- Maintain contact with the Safeguarding Officer in each Club.
- Provide or enable training for the Safeguarding Officer in each Club.
- Attend Rotary GB&I training events.
- Provide information and advice on safeguarding policies and practices to the Clubs in the District.

- Guide the Clubs on matters related to safeguarding.
- Ensure that Clubs are made aware of their responsibilities.
- Be the District's point of reference for all concerns relating to abuse.
- Support Clubs in dealing with any allegations of abuse.
- Report cases and action taken to the Rotary GB&I Compliance Officer.
- Establish and maintain contact with relevant statutory and non-statutory agencies.
- Act as a counter-signatory within the Rotary GB&I 'registered body' for Disclosures and to maintain records for the purposes of the checks carried out by the Disclosure and Barring Service (DBS) or the Central Registered Body in Scotland (DBSS), or NIPS. (Northern Ireland Police Service) or Garda Siochana (Eire), or to appoint a person to act on his or her behalf.
- Monitor the arrangements within the District.

## **Club Safeguarding Officer (CSO)**

Each Club should appoint a Safeguarding Officer, failing which the Club President will fulfil this role. Ideally, that person should have some background and familiarity with child and vulnerable adult safeguarding issues. Additional training and Club awareness-raising sessions will be provided by District. In metropolitan or other areas where there are several Clubs it may be appropriate for the Clubs to work in partnership and have a single Rotarian to act as liaison and point of reference for this purpose.

### **Role and responsibilities**

- Ensure the Club signs the Compliance Confirmation Form
- Implement, promote and manage safeguarding issues in the Club.
- Report to the Club Council.
- Ensure that everyone who has regular contact with children or vulnerable adults (defined in Appendix A: Definitions of terms) is covered either by the appropriate level of Disclosure or by the terms of the agency for whom they are working: for example, a school, hospital, hospice, uniformed organisation, transport organisation
- Establish contact with the senior member of social services staff responsible for safeguarding issues in the locality of the Club.
- Be familiar with local procedures for safeguarding issues and liaise with local organisations: for example the Area Child Safeguarding Committee.
- Maintain contact with the District Safeguarding Officer and attend District training events.
- Provide information and advice on safeguarding to the Club.
- Provide or enable training for the Club.
- Inform the appropriate authority of relevant concerns about individuals arising out of Rotary projects or activities.
- Deal with allegations of abuse, or appoint a person to act on his or her behalf.
- Keep the President and Council of the Club informed of any action taken and any further action required.
- Maintain secure case records of the action taken by the Club, the liaison with other agencies and the outcome.
- Act as the Club's contact person and maintain any records for the purposes of the checks carried out by the Disclosure and Barring Service (DBS), Central Registered Body in Scotland (DBSS), or NIPS (Northern Ireland Police Service), or Garda Siochana (Eire), or to appoint a person to act on his or her behalf.

## **More about the duties of the Club Safeguarding Officer**

There are four main aspects:

- Provide training appropriate to the events and activities the Club carries out.
- Ensure that the Club plans all events involving children and the vulnerable so that risks are reduced to minimum.
- Select people carefully and where necessary carry out criminal record checks.
- Have arrangements to deal with allegations, complaints and concerns.

## **Establishing and maintaining contact with local organisations**

In an area served by a Rotary Club there will be many services concerned with children and vulnerable adults. Find out who they are, make contact and even arrange to meet. It might even be worthwhile inviting the person to attend a Rotary meeting. If you ever have a problem it is always easier to discuss it with someone that you have already contacted in happier times.

## **Acting as the main contact within the Club for the safeguarding of children and vulnerable adults**

The CSO should look outwards to see what is on the safeguarding horizon and inwards to the Club and its safeguarding needs. A CSO is the main contact in a Club but not the person who can be expected to do or know everything concerned with safeguarding issues. Safeguarding in Club events and activities will succeed only if it is seen as a part of every Rotarian's way of working. It should be part of every event organiser's planning.

The role of the CSO is to provide help, advice and guidance. One way of achieving that is to be available to respond to requests for help from members and event organisers. If the answer is unclear, there is a large network of people able to help: CSOs in each Rotary District; DSOs across Rotary GB&I, the Rotary GB&I Compliance Officer and the Rotary GB&I Secretariat. Resources are also available on the [Disclosure and Barring Service](#) (DSB) website. The wealth of experience and knowledge is considerable and available to each CSO. Do not be afraid to ask. Much of the guidance in this document is the result of people asking questions.

The three things that can make a difference are:

- Dealing efficiently and sensitively with criminal record checks.
- Maintaining contact with your DSO.
- Providing timely advice and, where the answer is not clear, linking the Club into the District and national network.

## Safeguarding guidelines and code of conduct

These apply to everyone acting with or on behalf of Rotary at a Club event or activity. That includes every Rotarian, any paid staff or people working under contract to a Club, as well as any helpers and volunteers. All must act in a way that is in line with and in sympathy with the policy established by the Club. Any person who for any reason finds it impossible to comply should not take part.

- Guidelines should cover: The right of the child or vulnerable adult to be treated with respect and safeguarded from harm. (Rights of the Child and Vulnerable Adult).
- The need for a proper recruitment process for people working with children or vulnerable adults
- A written code of behaviour that outlines good practice (See Appendix B: Code of behaviour).
- The need for a named person to be in charge.
- Arrangements whereby children, vulnerable adults, parents, Rotarians and other workers can voice concerns about the behaviour of others. (See Appendix J: Dealing with complaints, accusations and whistle-blowing).
- The training available.
- If relevant, the arrangements for trips, visits and adventurous activities.
- If relevant, the arrangements for residential activities. (See Appendix G: Safeguarding requirements for specific Rotary activities – Youth Exchange and related activities).
- If relevant, the arrangements for Youth exchange, Rotary Youth Leadership Award (RYLA) and Interact. (See Appendices G 'Safeguarding requirements for specific Rotary activities – Youth Exchange and related activities).
- If relevant, how the Club involves children and vulnerable adults in decisions about projects, activity and safety.
- If relevant, the arrangements for contact with parents or other carers.
- If relevant, the ways in which intimate care needs are handled in the case of the very young or the vulnerable.
- Role/Job descriptions of the various activities in hand.
- How the Club should deal with Health & Safety issues.

This document provides advice on the content of these guidelines.

## Planning events and activities

It is difficult to lay down hard and fast advice on planning events so that safeguarding issues are properly considered. The following headings and their respective appendices provide some guidance based on experience.

When planning any event it is wise to begin early.

- Involve and consult people with expertise: the Internet is an amazing source of information about contacts.
- Carry out a risk assessment (See [H&S Risk Assessment Form](#) on the Rotary GB&I website).
- Involve the Club Safeguarding Officer or another person with a background in safeguarding.
- Involve the Club Health & Safety Officer and so ensure that Health & Safety legislation is followed.
- Ensure that mini-bus, coach and other regulations and safety advice are followed.
- Ensure that health and hygiene regulations are followed if food preparation and service is involved.
- Ensure that advice on supervision of children and vulnerable adults on trips and visits is followed.
- Ensure that the advice on photography is followed and taken into account when carrying out risk assessment (See Appendix F: Photography of children and vulnerable adults at Rotary events).
- Check the credentials of all outside contractors and organisations used.

- Give time for proper procedures in the selection of workers and volunteers
- Give time for adequate preparation, induction and training of the persons doing the work.
- Ensure that it is clear who is in overall charge of the event and its constituent parts.
- Check any local by-laws.
- Check insurance.
- Check any rules or guidance issued by RI or Rotary GB&I: Youth Exchange for example (see Appendices G 'Safeguarding requirements for specific Rotary activities – Youth Exchange and related activities).
- Be prepared to alter the plans to improve safeguarding.

### **Minimising the possibility of abuse**

Safeguarding procedures should ensure that the possibility of abuse of any kind is ruled out. Every Club will have a Safeguarding Officer. If he or she is not available for an event involving children or vulnerable adults, a Rotarian should be nominated as the point of reference at the event for any complaints, allegations or matters of concern.

If a Rotary Club is the organising body, the person in charge should tell all the participants and workers who that person is. If the participants are children or vulnerable adults the parents or carers should be informed. In any correspondence it is recommended that the name and contact details are given and, if appropriate, they are displayed at a venue.

The written permission of a parent or guardian must be obtained if a child is to take part in any activity organised by a Club. The process of seeking permission should include the details of the activity and give information about the nominated person.

In the case of a vulnerable adult, that person should be made completely aware of what the activity is going to involve and be encouraged to discuss it with any person who has a responsibility for their care. To assist with this, written information should be provided even when the person may not be able to cope with it personally.

### **Reducing the need for obtaining permissions**

Careful planning can obviate the necessity for some of these potentially irksome routines.

#### School events

The need to seek the permission from parents for young people to take part in an event such as a Public Speaking Competition may be unnecessary if the arrangements are conducted through the school and the students are accompanied by members of the school staff. Many schools seek blanket permission from parents for such activities. Never-the-less this should be checked with the school.

#### Events with parents or carers in attendance

Many difficulties of taking children or vulnerable adults on visits can be reduced by taking children with their parents or carers or, in the case of vulnerable adults, taking vulnerable adults with their carers.

### **Sharing information on safeguarding**

A Club should share information on safeguarding and good practice with children, vulnerable adults, parents and carers, Rotarians, staff, helpers and volunteers associated with the Club.

Everyone involved in an event or an activity should be aware of the policies and codes of practice of the organising Rotary Club.

Parents and carers of the children or vulnerable adults taking part have a right to know the details of the arrangements, should be given the opportunity to ask questions and give permission.

## **Ways to share information**

- Use a Club meeting to give a detailed briefing before a Club event.
- Use the Club bulletin.
- Have a de-brief at the end of an activity.

## **Involving parents and carers**

- Make sure that they know who is in charge and who is the contact person is.
- If appropriate, have a pre-activity meeting when questions can be asked of the organisers.
- Provide detailed written information, programme and a contact name and number for questions or concerns.
- Ensure that the way to register complaints and concerns is clear.
- Be willing to give time to discuss and act upon any concerns expressed prior to, during or after the event or activity.
- Be aware that not all parents and carers have English as the first language.
- Involve parents as contributors; perhaps as members of the organising committee, drivers, additional supervisors or as activity leaders, for example.
- Get parental consent for all activities or ensure that it has been given.

## **Dealing with matters of concern**

The Club Safeguarding Officer and the nominated person in charge of an event are the points of contact for the expressions of concern. Those may vary from straightforward complaints about a trip or activity to more serious concerns about the behaviour of an adult towards children, of children towards children, the atypical behaviour or the condition of a child or vulnerable adult. The source may be from within the organising team of adults or from outside.

All persons involved in an activity must know how to respond to a person revealing a complaint, a suspicion, a matter of concern or allegation, who to contact and how. All such Disclosures, however seemingly trivial must be reported to someone.

As an organisation working with children and the vulnerable, a Rotary Club or District must know what to do if a child or vulnerable adult discloses something which is unconnected with the Rotary activity but concerns that individual. Similarly, a Club or District must know what to do if the condition, demeanour or behaviour of a child or a vulnerable person gives an indication that abuse may be occurring.

The ways of dealing with concerns, complaints or allegations and passing on information about suspected abuse are covered in Appendix J: Dealing with complaints, accusations and whistle-blowing).

## **Safeguarding training programmes**

Appropriate training can be given to Rotarians, staff, helpers and volunteers associated with the Club, in the processes and procedures of child and vulnerable adult safeguarding. Model training programmes are provided by Rotary GB&I for delivery in different contexts: the Rotary Club (Club); the Rotary District (District) or by Rotary GB&I (RIBI). They are tailored to the varying needs of Districts, Clubs, Rotarians, employed staff and volunteers.

These are:

- General awareness training for all Rotarians, volunteers and helpers. (Club).
- Detailed training for the District Safeguarding Officer. (Rotary GB&I).
- Detailed training for the Club Safeguarding Officer. (District).
- Specific information and written advice for those in charge of occasional activities for children and vulnerable adults. (Rotary GB&I).
- Detailed training, information and advice for those in charge of regular Rotary programmes such as Youth Exchange, Summer Camps, Rotary Youth Leadership Award and Interact. (Rotary GB&I and District).

## **Recruitment and selection**

A Club will need to recruit and select Rotarians, staff, helpers and volunteers associated with the Club to assist with projects and activities.

Securing people to assist with service projects and activities has never been easy and there is a tendency to 'leap upon' anyone who volunteers to help. Where the work involves children and vulnerable adults, such an unselective approach must be avoided.

A professional approach must be taken. This involves deciding which jobs will involve contact with children, the nature of that contact and its regularity and whether a DBS check is required. Job descriptions need to be compiled and people chosen to carry them out. In this way all involved will know what is expected of them and safeguarding will be assured.

## **Monitoring and reviewing policy and procedures**

### **Rotary GB&I procedures**

The Rotary GB&I Compliance Officer is accountable to the Rotary GB&I Executive and is supported by specialist members of the Rotary GB&I staff as well as a specialist firm of solicitors.

### **District procedures**

A District chooses how it organises its affairs, but some have found value in attaching the District Safeguarding Officer to a District committee. Whatever structure is chosen it is recommended that the District Safeguarding Officer monitors and the adherence to the policy and procedures each year with the help of the Rotarians in charge of the various service committees. This should be reported to the District Executive Committee and minuted.

### **Club procedures**

It is recommended that the Club Safeguarding Officer monitors the adherence to the policy and procedures each year with the help of the Rotarians in charge of the various service committees. This should be reported to the Club Council and minuted.

# Disclosure & Barring Service checks – Process and procedures

## General Statement

The protection and safeguarding of children and adults who may be vulnerable is a paramount concern for every Rotarian.

Any project or activity planned and carried out by a club **MUST** give consideration to the safety and well being of any child or vulnerable adult who is benefiting from or participating in that project or activity.

Consideration **MUST** also be given as to whether any Rotarian or Volunteer participating requires a DBS check. This should be part of the Risk Assessment that must be carried out for all Rotary activities.

## Disclosures and Fees

- The DBS filter certain old and minor cautions and convictions, reprimands and warnings from criminal records certificates.
- Applications through Rotary are classed as 'volunteer' applications and there is no fee charged, providing the appropriate 'volunteer' has been marked on the application.
- Once certificates are received, it is strongly recommended that Rotarians/supporters subscribe to the Update Service, again, subscription is free of charge for a voluntary position and, with the consent of the applicant, enables an organisation (including Rotary) to go online to carry out a free, **instant** check for the same workforce, where the same type and level of check is required to find out if the information released on the DBS certificate is current and up to date – no forms to fill in or waiting time for applications to be processed.

## When Disclosures are required

For it to be permissible to ask a person to apply for a Disclosure that person must be:

- Involved or chosen to be involved in a position that the law says requires a Disclosure. Examples are a school governor, a trustee of children's charity. District Safeguarding Officers who are DBS Countersignatory should also be DBS checked. There are many more roles.
- Involved or chosen to be involved in a position that gives regular access to children or vulnerable adults. The definition of the term 'regular' means carried out by the same person frequently.

It is important to note that the level of Disclosure is entirely dependent on the exact duties and responsibilities of the role. The decision on the level required depends on the exact nature of the duties, for further up to date guidance see the [Disclosure and Barring Service](#) (DSB) website.

## How long a DBS check is valid

A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. The CSO should liaise with the DSO to discuss the specific activity and decide if a new check is needed for someone with an existing DBS certificate.

## Activities with Children

When Rotarians/supporters are to be involved

- in a Regulated Activity with Children,
- in a Specified Establishment,
- meet the Time Period condition,
- and have the opportunity to have contact with Children as a result of anything he/she is permitted or required to do in connection with the activity,

they are required to have an Enhanced DBS check.



## **Regulated Activity relating to children**

### **1. Unsupervised Activities**

Teach, train, instruct, care for or supervise children, provide advice/guidance on well being, drive a vehicle only for children.

### **2. Specified Establishments**

Schools, Academies (provision of full time education to under 18's) pupil referral units children's homes, child care premises, children's detention centres, family/children centres

### **3. Personal Care\* / Health Care\***

For example washing or dressing; or health care by or supervised by a health care professional.

### **4. Registered Childminding\* and Foster-Carers\***

### **5. Day to Day management on a regular basis of person providing a regulated activity.**

### **6. Welsh Offices**

This does not include family or personal arrangements

\* Even if done only once

## **Time Period of Contact**

- Frequently – defined by DBS as 'once a week or more'
- 4 or more days in a 30 day period
- Overnight between 2.00am-6.00am

## **The Statutory guidance: Regulated Activity (children) - supervision of activity with children which is regulated activity when unsupervised.**

In such a case, the law makes three main points:

- there must be supervision by a person who is in Regulated Activity;
- the supervision must be regular and day to day; and
- the supervision must be "reasonable in all the circumstances to ensure the protection of children".

Supervision is required to be consistent for the duration of the activity regardless of the length of time involved. For example if an activity runs for several weeks the supervision must be constant throughout and not intensive at the beginning and tapering off towards the end of the time.

This clearly defines the definition of the Supervision required for any activity and anything less than the required criteria makes the Activity Unsupervised and therefore Regulated and requiring the Enhanced DBS check.

## **Activities with Adults**

Likewise if Rotarians are to be involved in a Regulated Activity with Adults who may be considered to be Vulnerable at that particular time, they will need to have an Enhanced DBS check. However there are no Specified Place/Establishment criteria nor is there a certain number of times that the activity undertaken becomes Regulated. A one off activity can be deemed Regulated, if the adult is deemed to be Vulnerable at that particular time.

## **Regulated Activity relating to Adults**

The new definition of Regulated Activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities. There is also no longer a requirement for a person to do the activities a certain number of times before they are engaging in regulated activity.

The six categories within the definition of Regulated Activity for Adults:

### **1. Health Care**

Health care provided by any health care professional or under the direction or supervision of one is regulated activity.

**2. Personal Care**

Such as washing and dressing, eating, drinking and toileting.

**3. Social Work**

In connection with health or social services.

**4. Assistance with Household Affairs**

Cash, bills, shopping.

**5. Assistance with the Conduct of Affairs**

Power of attorney/deputies appointed under the Mental Capacity Act.

**6. Conveying an Adult**

Must be for health, personal or social care due to age, illness or disability.

When a role description has been worked out and the tasks clearly defined, three questions should be answered:

- Is the activity regular? The definition of the term 'regular' means carried out by the same person frequently
- Will the person be in 'sole charge'?
- Will the person have 'unsupervised contact'?

If the answers to any of these questions is 'Yes' and careful planning cannot render it unnecessary, then criminal record checks should be sought as outlined in this document.

**Activities not requiring Disclosures**

These are examples of activities that are not regular or do not involve contact with children or vulnerable adults. A Disclosure is unnecessary.

- Occasional meeting with a head teacher in school or leader in a youth Club.
- Brief contact with children when a teacher, parent or leader is present.
- Rotarians, volunteers, contractors or tradesmen effecting repairs, doing gardening or similar jobs. (For Health & Safety reasons children should not come into contact with these people anyway).
- Rotarians, volunteers or parents who accompany teachers, youth leaders or other trained people and children on 'one-off' activities.
- Rotarians or volunteers entering school to sell merchandise or to run stalls as a 'one-off' activity.
- Kids out: Rotarians attending as helpers.
- Father Christmas: Rotarians or parents in attendance.
- Occasional volunteer drivers; not regular drivers.

**Positions for which Disclosures may not be sought (Illegal)**

Unless a person is to work with children or with vulnerable adults on a regular basis or legislation demands it, it is illegal to ask a person to seek a Disclosure and also for the person to request one. Consequently, a Disclosure may not be sought for the positions listed below, or any similar ones unless the conditions above apply.

- Rotarian – as a condition of membership.
- President or officer of the Club.
- Club safeguarding officer.
- Any position unless it gives regular access to children or vulnerable adults.

## How to apply for a Disclosure: the Rotary GB&I arrangements

### Requirements for using Rotary GB&I as a 'registered body'

A Rotary District and a Club must ensure that the following routines and procedures are followed to make use of the service.

### Making decisions on the suitability of individuals

The decision as to the suitability of an individual for a particular position rests with the employing or volunteering body which in the majority of cases is the Rotary Club or District. That judgement will take into account the precise nature of the work, an assessment of the risks, using the Rotary H&S Risk Assessment Form, and the nature and 'age' of any criminal offences. A criminal record does not automatically debar a person from work with children or vulnerable adults (see [DBS website](#) for more information).

### Recording Disclosures

Records must be kept of every Disclosure request. DBS have strict guidelines for handling of DBS certificate information and these should be adhered to at all time. DBS require that Rotary GB&I, Districts and Clubs have a written policy on the correct handling and safekeeping of DBS certificate information. See Appendix E: Policy on secure handling, retention and disposal of DBS check information – for adoption by Districts and Clubs for guidelines and sample policy for use by Districts and Clubs.

Only the minimal information will be recorded, this will include the DBS Application Form reference number, date requested, the name of the subject, the type of Disclosure applied for, the position or role for which it was requested and the decision taken after the disclosure has been issued. Such records should be kept by the District Safeguarding Officer (DSO) and by the Club Safeguarding Officer (CSO). The actual Disclosure Certificate **must not** be photocopied and retained on file, nor should any details on the certificate be recorded.

### Key areas to note regarding the DBS Procedure

CSOs and DSOs should note that the organisation making the request for a disclosure (club/district) is no longer notified of the disclosure information. The disclosure certificate is issued direct to the applicant and the applicant must be requested to show the certificate (originals only, photocopies are not acceptable). It has been agreed that within Rotary GB&I, the District Safeguarding Officer will be the person responsible for scrutinising the certificate and will inform the CSO of the outcome, i.e. 'acceptable, OK to proceed' or 'unacceptable, cannot undertake the activity/job role'. The specific Disclosure information contained on the certificate must not be recorded. Should an applicant refuse to show the DSO the certificate, the applicant should not be permitted to engage in the Rotary activity/job role applied for.

The DBS instructions will give details of the current documents that must be used to check the identity of the applicant. [There are 3 routes to check the identity of an applicant](#) – Rotary GB&I will only accept Route 1 (routes 2 and 3 involve the use of an outside identity validation agency, including fingerprinting) and the documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first. The DBS also provide instructions on how [check the documentation](#) to ensure they are legal documents before submitting the application. These DBS guidance documents must be followed on each occasion.

### Rotary GB&I Disclosure Application process using Rotary GB&I as a 'registered body' (as of 1<sup>st</sup> July 2015)

The procedure below is based at club level, the same procedure applies if the activity/job role is at district level and applies for clubs and districts within England and Wales. Different procedures apply for [Scotland](#), [Northern Ireland](#) and [Republic of Ireland](#) and specific procedural guidance and forms will be provided to clubs by the relevant DSO.

1. Clubs risk assess all activities/job roles, using the template [Rotary GB&I Risk Assessment Form](#) and take into consideration the Health & Safety Policy, the Safeguarding Policy and Equality & Diversity Policy.
2. Risks are identified in respect of Safeguarding (relating to children or vulnerable adults).
3. CSO discusses risks with activity organisers to see if they can be eliminated by alternative planning arrangements.
4. If a Disclosure is considered as necessary, CSO to contact DSO to discuss appropriateness, level of disclosure and obtain DBS Application Form if agreed from the DSO.
5. DSO records the details and the unique DBS Application Form reference number supplied to the club. See guidance above under 'recording disclosures' and Appendix E: Policy on secure handling, retention and disposal of DBS check information – for adoption by Districts and Clubs.
6. CSO and applicant complete the form.
7. Depending on the local district arrangements, the DSO/CSO undertakes the Identity Check in accordance with the [DBS instructions](#) available online at that time – see 'Key areas to note regarding the DBS Procedure' above for links to DBS instruction documents. DSO/CSO must verify the identity checks have been undertaken by completing the 2 sections for 'registered body use only' on the inside of the form.
8. DSO/CSO completes Rotary GB&I Verification Form, provided with each application form.
9. CSO sends completed Application Form and Rotary GB&I Verification Form to DSO to countersign, together with the role description or job description of the post or job for which the Disclosure is sought. The CSO keeps a secure record of the Rotarian/person's name, post applied for, the date when the form was posted to the DSO and the position to which it relates. No other details are kept. No photocopies or abstracts of the form may be made but the applicant may wish to make his/her own copy. See guidance above under 'recording disclosures' and Appendix E: Policy on secure handling, retention and disposal of DBS check information – for adoption by Districts and Clubs.
10. The DSO verifies that there is a need to seek a Disclosure, checks the form has been completed correctly (using the [DBS Completing the Application Form-Guide for Countersignatories](#)). The DSO enters their unique Countersignatory number and countersigns the application form and sends it to the DBS Office. The DSO should keep a secure record of the applicant's name, the details of the CSO making the request and the date the form was sent to the DBS. No photocopies of the form are made.
11. If the job description or job role is not appropriate for a Disclosure check, DSO should communicate with the CSO to explain why.
12. Application is processed by DBS and certificate is sent direct to applicant.
13. CSO requests the applicant to contact the DSO to arrange for the original certificate to be seen by the DSO and confirm that it is permissible for the applicant to go ahead with the activity/job role. At this time, the CSO should also recommend to the applicant to register their certificate with the online DBS Update Service. This will enable organisations, including Rotary, to view the certificate information in future online with immediate results without the need for the applicant completing further application forms, providing the applicant keeps the online registration up to date. **Note: the applicant must register their certificate with the Update Service within the current specified days of the certificate being issued, otherwise they forfeit the opportunity to do so, details on the Update Service and timescales are available on the DBS website.**
14. DSO views the original certificate provided by the applicant and decides whether the applicant can proceed with the activity/job role applied for. Photocopies of the certificate are not acceptable. The DSO can view the certificate in one of two ways.
  - Via post, with both the applicant and the DSO using a secure method such as Recorded or Registered Delivery.
  - In person, with the DSO arranging to meet with the applicant at a mutually convenient time and location to view the certificate.

The DBS certificates have security features to assist in verifying a certificate is genuine, details are available on the DBS website.

The certificate will indicate on it if there are any disclosures and the details.

  - If there are no disclosures:- The DSO notifies the CSO that the applicant can proceed with the activity/job role applied for and both update their records.

- If there is information disclosed on the certificate, that information may not be discussed by the DSO with any person other than the applicant. It is the responsibility of the DSO to discuss the disclosed information with the applicant and make the decision as to whether there are any negative reasons that would affect the applicant's suitability to do the job (a disclosure of a driving incident at 17 years of age should not affect a 60 year old Rotarian from participating in a mock interview project in a school, but depending on the circumstances, it may be felt that it would affect their ability to be a driver for a club project). Should there be a negative outcome, the DSO should simply advise the CSO that the applicant is not suitable for that activity/job role without giving any details and update their records accordingly.

As a 'registered body', Rotary GB&I is responsible to the registering authorities and must be sure that:

- there a legitimate reason for seeking a Disclosure and
- the arrangements for the use of the information, its security and disposal meet the legislation.

Failure to comply could lead to withdrawal of Registration from Rotary GB&I and even criminal prosecution of the end user.

The [Disclosure and Barring Service](#) maintains an excellent website which should be consulted for the latest updates and information of their service. Equivalent website are available for legislation in [Scotland](#), [Northern Ireland](#) and [Republic of Ireland](#).

*(This policy is available to download from the [Rotary GB&I website](#), Appendix E, as a form for Districts/Clubs to sign)*

## **Policy on secure handling, retention and disposal of DBS check information - for adoption by Districts and Clubs**

We will not retain any image or photocopy or any other form of, or extract from, the Disclosure information.

We will however, keep information that complies fully with the Code of Practice and guidance issued in connection with the correct handling, use, storage, retention and disposal of Disclosure information. It also complies fully with the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

### **Storage and access**

We will only keep Disclosure information in securely, lockable, non-portable storage containers. Access to storage units is strictly controlled and limited to those who are entitled to see it as part of their duties.

### **Handling**

We undertake that Disclosure information will only be used for the purpose for which it has been provided and recognise that it is a criminal offence to disclose Disclosure information to any person who is not entitled to receive it. We, therefore, only pass Disclosure information to those who are entitled to see it in the course of their duties.

### **Usage**

We ensure that Disclosure information is only requested when necessary. We ensure that Disclosure certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

We ensure that Disclosure information will not be kept any longer than is required after the recruitment (or other relevant) decision has been taken. In general, this is for a period of up to 6 months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult with Rotary GB&I about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. We will ensure that the same conditions relating to secure storage and access will apply during any such period. Notwithstanding the above, we may keep a record of the date of issue of the certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the decision taken.

### **Disposal**

Once the retention period has elapsed, we will ensure that any Disclosure certificate information is destroyed by secure means, i.e. shredding or burning. While awaiting destruction, we will ensure that Disclosure certificate information will not be kept in any insecure receptacle (e.g. waste bin).

### **Record keeping**

Notwithstanding the above, we may keep a record of the date of issue of the certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the decision taken.

## Resources and useful links

This list of links will be regularly reviewed and updated so do not forget to revisit this page.

### Links to Rotary GB&I website:-

[Rotary GB&I Safeguarding Policy – Children](#)

[Rotary GB&I Safeguarding Policy – Vulnerable Adults](#)

[Rotary GB&I Safeguarding Guidance Manual](#)

[Rotary GB&I Safeguarding Guidance Manual - Supplement for Scotland](#)

**There are a number of Appendices that compliment this Safeguarding Guidance manual (listed below). These are available to download from the Safeguarding Compliance section on the Rotary GB&I website, [click here](#).**

Appendix A: Definition of terms

Appendix B: Code of behaviour

Appendix C: Risk assessment

Appendix D: Involving parents, carers, children and vulnerable adults as partners

Appendix E: Policy on secure handling, retention and disposal of DBS check information – for adoption by Districts and Clubs

Appendix F: Photography of children and vulnerable adults at Rotary events

Appendix G: Safeguarding requirements for specific Rotary activities – Youth Exchange and related activities

Appendix H: Insurance and legal arrangements

Appendix I: Forms and signs of abuse

Appendix J: Dealing with complaints, accusations and whistle-blowing

Appendix K: District safeguarding check list

Appendix L: Club safeguarding check list

Appendix M: FAQs regarding compliance forms and popular myths regarding abuse

Appendix N: Safeguarding Guidance Supplement for Scotland

Appendix O: Useful contact names, addresses and other details

### Useful Disclosure and Barring Service (DBS) webpage links:-

[DBS website](#) – a great deal of the website terminology is phrased towards ‘employers’ and ‘umbrella bodies’ and should be read in the correct context of the Rotary Club/District being the ‘employer’ of the person seeking the application. Rotary International in Great Britain & Ireland is a Registered Umbrella Body.

[DBS update service](#) – all applicants should be encouraged to register their DBS certification with the update service as this may mean they never have to complete another application form!

[Guidance to help validate the identity of a DBS check applicant](#) – there is a legal responsibility on the club safeguarding officer/district safeguarding officer to follow the specific and robust identity check procedure as directed by the DBS. This document should be reviewed on each occasion when checking identity to ensure the most up to date guidance is being followed. It includes the list of approved documents for ID checks. Note: Rotary International in GB&I have set the standard that **only Route 1 is acceptable**, (Routes 2 and 3 involve the use of an outside validation agency, including fingerprinting).

[DBS application form: Countersignatories Guide](#) – step by step guidance for District Countersignatories.

[Step by step guidance for Applicants filling in the Disclosure and Barring Service \(DBS\) application form.](#) – guidance to give to applicants with the application form.