

SAFEGUARDING POLICY

Marylebone Cricket Club Foundation (“the Foundation”) is committed to creating and maintaining the safest possible environment for children and vulnerable adults to enjoy the experience of playing cricket through initiatives organised by the Foundation.

The Foundation has a legal duty to ensure that children and adults at risk with whom it engages, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse. This is an obligation which the Foundation takes very seriously. The Foundation has formally adopted the ECB's policy for safeguarding children in cricket: Safe Hands.

In all its dealings with children and vulnerable adults at risk, the Foundation will ensure that:

- a) the welfare of the child or vulnerable adults at risk is paramount;
- b) all concerns, suspicions and allegations of abuse and poor practice are taken seriously and responded to swiftly and appropriately; and
- c) that it has a system for dealing with concerns about possible abuse.

This policy applies to all trustees, employees, cricket coaches and volunteers involved with the Foundation.

Overseas delivery partners are subject to the delivery organisation’s safeguarding policy (that must adhere to local safeguarding standards) which has been agreed by the Foundation. Regular monitoring visits by the MCC Foundation Executive team will be scheduled to ensure compliance with safeguarding policies by the delivery staff.

Safeguarding concerns should be sent to the Foundation’s Safeguarding Officer, Izzy Gurney (mccf.safeguarding@mccfoundation.org.uk / 07867 639789). In the absence of the Safeguarding Officer, please contact the Foundation’s Deputy Safeguarding Officer, Angus Berry (angus.berry@mccfoundation.org.uk / 07585 554449) or Safeguarding lead on the Board of Trustees, Rohan Kapadia (rohankapa@icloud.com / 07786 544565).

OBJECTIVES

The objectives of this policy are:

- i. to support the culture within the Foundation that safeguarding children and vulnerable adults at risk is everybody’s business;

- ii. to ensure that MCCF practices safe recruitment in checking the suitability of all employees who will be working directly with children and vulnerable adults at risk;
- iii. to recognise that all children and vulnerable adults at risk have the right to freedom from abuse;
- iv. to respond swiftly and appropriately to all suspicions or allegations of abuse, by providing parents, guardians, carers, children and/or vulnerable adults at risk with clear guidelines for voicing concerns;
- v. to initiate action if and when abuse of a child or a vulnerable adult at risk occurs by ensuring all appropriate responsible persons have been contacted; this will include the ECB safeguarding team.
- vi. to ensure that access to confidential information is restricted to the person responsible for children and vulnerable adults at risk or the appropriate authorities;
- vii. to regularly review this policy to ensure the effectiveness of the Foundation's safeguarding activities;

- viii. to inform all employees of their responsibilities to safeguard children and vulnerable adults at risk, and to inform employees what they should do if they are concerned about the behaviour of an adult who works with children or vulnerable adults at risk.

DEFINITION OF KEY TERMS

Child	a person under the age of 18 years.
Vulnerable adult at risk	a person aged 18 years or over who: <ul style="list-style-type: none"> i. has care and support needs; ii. is experiencing, or is at risk of abuse or neglect. iii. has care and support needs which mean they are unable protect themselves against actual or potential abuse or neglect.
Safeguarding children	<ul style="list-style-type: none"> i. protecting children from abuse and neglect; ii. preventing impairment of children's health and Development; iii. taking action to enable all children to have the best life chances.
Safeguarding vulnerable adults at risk	<ul style="list-style-type: none"> i. protecting vulnerable adults from abuse and neglect; protecting their right to live in safety, free from abuse and ii. neglect; iii. empowering and supporting them to make choices, stay safe and raise any concerns.

Abuse	<p>Abuse is a form of maltreatment of a child or a vulnerable adult of risk.</p> <p>Somebody may abuse or neglect a child or an adult at risk by inflicting harm, or by failing to act to prevent harm. Children or vulnerable adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.</p>
Physical Abuse	<p>Somebody may abuse or neglect a child or a vulnerable adult at risk by inflicting harm, or by failing to act to prevent harm. Children or vulnerable adults at risk may be abused in a family or in an institution or community setting; by those known to them, or more rarely by a stranger. Physical harm may also be caused when a parent/carer feigns the symptoms of, or deliberately causes ill health to a child or a vulnerable adult at risk whom they are looking after.</p>
Emotional Abuse	<p>The persistent emotional maltreatment of a child or a vulnerable adult at risk such as to cause severe and persistent adverse effects on the child or a vulnerable adult at risk's emotional development:</p> <ol style="list-style-type: none"> i. It may involve conveying to a child or a vulnerable adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. ii. It may include not giving the child or the vulnerable adult at risk opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. iii. It may feature age or developmentally inappropriate expectations being imposed on children or vulnerable adults at risk. These may include interactions that are beyond a child or an adult at risk's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or the vulnerable adult at risk participating in normal social interaction. iv. It may involve seeing or hearing the ill-treatment of another.

	<ul style="list-style-type: none"> v. It may involve serious bullying (including cyber bullying), causing children or vulnerable adults at risk frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults at risk. vi. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adults at risk, though it may occur alone.
Sexual Abuse	<p>Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. It may also include non-contact activities, such as involving children or vulnerable adults at risk in looking at, or in the production of, sexual images. Sexual abuse may take place online.</p>
Neglect	<p>Neglect is the persistent failure to meet a child or a vulnerable adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adults at risk's health or development. Neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> i. Provide adequate food, clothing and shelter (including exclusion from home or abandonment); ii. Protect a child or a vulnerable adult at risk from physical and emotional harm or danger; iii. Ensure adequate supervision (including the use of inadequate care-givers) iv. Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or a vulnerable adult at risk's basic emotional needs.
Bullying	<p>Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time.</p> <p>The three main types are:</p> <ul style="list-style-type: none"> i. Physical (for example, hitting, kicking, theft). ii. Oral (for example, racist or homophobic remarks, threats, name calling). iii. Emotional (for example, isolating an individual from the activities and social acceptance of his or her peer group).

GUIDELINES FOR APPROPRIATE INTERACTION WITH CHILDREN AND VULNERABLE ADULTS AT RISK

Examples of best practice guidelines to follow include:

- a) Always working in an open environment (e.g. avoid private or unobserved situations and encouraging open communication with no secrets).
- b) Treating all children and vulnerable adults at risk equally with respect and dignity.
- c) Always putting the welfare of children and vulnerable adults at risk first, before winning or achieving goals.
- d) Maintaining a safe and appropriate distance with children and vulnerable adults at risk (for example, it is not appropriate for employees, trustees, cricket coaches or volunteers to have an intimate relationship with a child or a vulnerable adult at risk or to share a room, changing room or shower with them).
- e) Making sport fun, enjoyable and promote fair play.
- f) Ensuring that messages relating to children or vulnerable adults at risk are sent via telephone, emails and texts through their parents/guardians/carers.
- g) Giving enthusiastic and constructive feedback rather than negative criticism.
- h) Ensuring that parental, guardian or carer consent is given and permission forms are completed before any digital images, photographs or footage of a child or vulnerable adults at risk are taken and/or used as part of any future marketing and/or other promotional material; this includes live online broadcast through social media platforms.
- i) Keeping a written record of any injury that occurs, along with the details of any first aid treatment given.
- j) Completing any training considered appropriate for their role.
- k) Follow all guidance in this policy when working with children or vulnerable adults at risk.

EXAMPLES OF BEHAVIOURS THAT MUST NEVER OCCUR

When interacting with children or vulnerable adults at risk, employees, casual workers and volunteers must not engage in any of the following (this is not an exhaustive list):

- a) engaging in rough, physical or sexually provocative games, including horseplay;
- b) sharing a room, changing room or shower with a child or a vulnerable adult at risk;

- c) allowing or engaging in any form of inappropriate touching;
- d) allowing children or vulnerable adults at risk to use inappropriate language unchallenged;
- e) reducing a child or a vulnerable adult at risk to tears as a form of control;
- f) failing to act upon and record any allegations made by a child or a vulnerable adult at risk; and
- g) arranging to meet a child or a vulnerable adult at risk outside of an event for a social meeting or contacting them on social media or texting on a mobile phone.

RECRUITMENT OF EMPLOYEES

The Foundation recognises that any person may have the potential to jeopardise the safety and wellbeing of a child or a vulnerable adult at risk. To that end, the Foundation shall take all reasonable steps to ensure that only those who have been appropriately assessed and vetted in accordance with relevant current statutory legislation and the Foundation's policy are engaged by the Foundation to work with children or vulnerable adults at risk.

Such checks shall include but not be limited to the following:

- a) Disclosure and Barring Service ("DBS") checks if an individual is engaged to work with children or vulnerable adults at risk on a regular basis; this check must be completed using the ECB DBS procedure for coaches.
- b) Substantiation of relevant credentials and training qualifications.

TRAINING

All individuals engaged as coaches by the Foundation will be required to complete an ECB, or equivalent, qualifications in cricket coaching, to ensure that they are instilled with best practice and to facilitate the development of a positive culture towards good practice and child protection. All Hub Managers and coaches are required to have ECB safeguarding training that has been completed within the last three years.

All employees, trustees, cricket coaches and volunteers will be sent a copy of the Safeguarding policy to read through at least three days prior to commencing their employment or position.

HOW TO REPORT A CONCERN

Safeguarding children and vulnerable adults at risk is everyone's responsibility. This means that everyone who is employed or engaged with the Foundation has a responsibility to respond to any concerns that they or others, may have about a child or a vulnerable adult at risk, or the behaviour of an adult.

If a disclosure relating to safety or wellbeing is made to employees, trustees, cricket coaches or volunteers they must:

- i. Reassure the child or adult at risk or other person reporting the concern that they were right to report the behaviour;
- ii. Keep questions to a minimum, and never ask leading questions;
- iii. If a criminal act is alleged, the police should be informed without delay. Where a child may be at risk of immediate physical harm, police or Social Services should be informed without delay.
- iv. Inform the person reporting the concern that you must report your conversation to the Foundation's Safeguarding Officer or in their absence, the Foundation's Safeguarding lead on the Board of Trustees.
- v. Make an immediate and objective written record of the conversation ensuring that a distinction is made between what the person has actually said and inferences you may have made. Wherever possible, include as many details as possible, including the name of the child or the adult at risk, their contact details, and age or date of birth. A template is available if requested from mccf.safeguarding@mccfoundation.org.uk.
- vi. Send this report to the Foundation's Safeguarding Officer, Izzy Gurney (mccf.safeguarding@mccfoundation.org.uk / 07867 639789) within 24 hours of the incident/reporting. In the absence of the Safeguarding Officer, please contact the Foundation's Safeguarding lead on the Board of Trustees, Rohan Kapadia (rohankapa@icloud.com / 07786 544565).

If employees, trustees, cricket coaches or volunteers witnesses an incident which causes them to be concerned for the well-being of a child or vulnerable adult at risk, they must:

- i. Ensure the immediate safety and wellbeing of the individual; seek medical attention for the individual if necessary;
- ii. If a criminal act is alleged, the police should be informed without delay. Where a child may be at risk of immediate physical harm, police or Social Services should be informed without delay;
- iii. Make an immediate objective written record of what they have witnessed, including as many details as possible, specifically the name of the child or the adult at risk, their contact details, and age or date of birth.
- iv. Send this report to the Foundation's Safeguarding Officer, Izzy Gurney (mccf.safeguarding@mccfoundation.org.uk / 07867 639789) within 24 hours of the incident/reporting. In the absence of the Safeguarding Officer, please contact the Foundation's Safeguarding lead on the Board of Trustees, Rohan Kapadia (rohankapa@icloud.com / 07786 544565).

WHISTLE BLOWING

Employees, trustees, cricket coaches, volunteers, players and parents may be the first to know about concerns about a child or vulnerable adult's safety and welfare. When individuals feel unable to follow the normal reporting procedures or have already followed the procedure and consider that the issues have not been adequately addressed, they are encouraged to contact a member of the Foundation's staff who in turn will contact the Safeguarding Officer. This process will enable individuals to share their concerns in good faith and in confidence, to enable the matter to be taken seriously, investigated, and managed appropriately. If the individual is still not satisfied, he or she is encouraged to use external whistleblowing systems such as those provided by the NSPCC or the organisation 'Public Concern at Work'.

WHOM TO TELL

Depending on the nature of the concern or disclosure, an employee, trustee, cricket coach or volunteer should refer the matter to the following individuals or organisations, as relevant:

- i. In an emergency, the police (999 or 112);
- ii. the Foundation's Safeguarding Officer, Izzy Gurney, via mccf.safeguarding@mccfoundation.org.uk, izzy.gurney@mccfoundation.org.uk or 07867 639789
- iii. In their absence, the Foundation's Deputy Safeguarding Officer, Angus Berry, via angus.berry@mccfoundation.org.uk or 07585 554449;
- iv. In the absence of the Foundation's Safeguarding Officer and Deputy Safeguarding Officer, the Safeguarding Lead on the Board of Trustees, Rohan Kapadia, via rohankapa@icloud.com or 07786 544565 who will advise next steps and progress the investigation;
- v. The ECB Safeguarding team via safeguarding@ecb.co.uk or 020 7432 1200.

There are other organisations that such concerns or disclosures could be referred.

All reporting must be done in consultation with the Foundation's Safeguarding Officer (or in their absence, the Foundation's Safeguarding lead on the Board of Trustees) who will advise what next steps to take, if any.

If employees are not sure to whom or where to refer their concerns, they should discuss it with the Foundation's Safeguarding Officer (or in their absence, the Foundation's Safeguarding lead on the Board of Trustees).

INVESTIGATIONS

Depending on the nature of the complaint or allegation, three types of investigations may be instigated:

- i. A criminal investigation (by the police);
- ii. A child protection investigation (by Local Authorities); and/or
- iii. An internal investigation in accordance with the Foundation's disciplinary policy (conducted by the Foundation).

Throughout any investigation, the welfare and safety of children and vulnerable adults at risk will take priority.


CONSEQUENCES OF BREACHING THIS POLICY

Over and above the three types of investigations listed above, breaches of this policy and/or failure to comply with the outlined responsibilities may result in the following:

- a. Employees: investigation, disciplinary proceedings which may result in the termination of their employment, and possible legal action;
- b. Trustees: investigation, disciplinary proceedings, and possible legal action
- c. Volunteers: investigation, disciplinary proceedings which may result in the termination of any involvement with the Foundation, and possible legal action;

REVIEW

This policy is reviewed, and any amendments approved, by our trustees on an annual basis. This policy was signed off in November 2023 for the period year ending 31st October 2024.



**MCC Foundation Chairman
November 2023**

Please see the procedural flowcharts below

