



SAFEGUARDING POLICY
(In force from June 2022)

A. PURPOSE AND APPLICATION

1. EXECUTIVE SUMMARY

- 1.1 The Commonwealth Games Federation (CGF) has adopted this safeguarding policy and its associated procedures to:
- 1.2 Protect all individuals connected with CGF, but in particular children and adults at risk, including adult athletes, from any type of harm and/or abuse (see appendix 1 for more detail about abuse) when they come into contact with CGF or are engaged in activities connected to CGF.
- 1.3 Ensure CGF Officials and others understand their responsibilities in relation to safeguarding.
- 1.4 Ensure CGF Officials and others know how to respond appropriately when concerns are raised about children or adults at risk or personnel.
- 1.5 Provide CGF Officials with guidance on how they should behave if they suspect that a child or athlete/adult at risk may be experiencing, or be at risk from some form of harm, and how to respond to and report a safeguarding concern.
- 1.6 Ensure compatibility with other CGF policies including, but not limited to Code of Ethics and Conduct, Human Rights Policy Statement, Whistleblowing Policy and Data Protection Policy.
- 1.7 For the avoidance of doubt, Commonwealth Games Associations, International Federations, the Commonwealth Sport Foundation (CSF), CGF Partnerships (CGFP) and Organising Committees of the Commonwealth Games and Commonwealth Youth Games (CYG) and any other Commonwealth Sport related events and activities are expected to have in place their own safeguarding policies and procedures and where appropriate this will be a contractual requirement. This policy and its accompanying procedures should be seen as complementing, rather than replacing, the policies and procedures of any other entity. If there is any conflict during the Games Period then this policy will take precedence

2. COVERED PERSONS

- 2.1 This policy applies at all times to 'CGF Officials' as defined by the Code of Ethics and Conduct (as amended from time to time), including (without limitation) all CGF staff, directors, contractors, and volunteers.
- 2.2 During the Games Period, this policy will extend to all Athletes and Athlete Support Personnel at the Commonwealth Games, including all individuals accredited to the Commonwealth Games in Aa, Ab, Ac, Ac**, Am, Ao, B, B**, J and P accreditation categories¹, as well as others accredited to participate in the Games in any manner.

¹ As defined in the CGF Accreditation Manual, these apply to Athletes (Aa), Athlete Competition Partners (Ab), Chefs de Mission, General Team Managers, Team Attachés and Aides to the Attachés (Ac), Chef de Mission and General Team Manager Guests (Ac**), Medical Personnel (Am), Team Officials, Extra Team Officials, Press Attachés and Administrative Personnel (Ao), Technical Delegates and IF Staff (B) and their guests (B**), Technical Officials (J) and Training Partners and Personal Coaches (P).

B. SCOPE

3. DEFINITIONS

3.1 Due to different definitions and terminology used across the Commonwealth Sport Movement it is important to have a clear and consistent understanding of what certain terminology means and to ensure that the context in which this policy has been developed is clearly defined. For the purposes of this policy, the following terms have the following meanings:

3.2 Adult at Risk: any person, including athletes aged 18 years or over who is or may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation, whether due to another having a position of trust over them, or due to physical or mental health or impairment, age, illness, circumstance (e.g., people encountering domestic violence, substance misusers and asylum seekers), or otherwise.

3.3 Child: anyone, including young athletes, under the age of 18 years old.

3.4 Child Protection: refers to protecting specific children who have been identified by relevant authorities as being at risk of significant harm and/or abuse.

3.5 Poor practice: refers to instances when the behaviour of an individual, though not abusive, falls below that which is acceptable in dealing with children or athletes/adults at risk, including in particular a failure to meet certain standards set by the CGF Safeguarding Code of Conduct (Annex 4 to the CGF Charter of Good Conduct).

3.6 Position of trust: A person (A) is in a 'position of trust' over another person (B) where (1) A is in contact with B, (2) A's role carries an expectation of trust, and (3) A is in a position to exercise authority, power or control over B (as perceived by B).

3.7 Safeguarding: 'Safeguarding' concerns all actions, practices, policies and procedures that are implemented across the Commonwealth Sport Movement to protect individuals and prevent and respond to harm and abuse. The CGF Safeguarding vision is: "Everyone who engages with the Commonwealth Sport Movement has a right to be safe from harm and abuse regardless of the context they live, grow, play, train, compete or work in. Safeguarding is therefore at the heart of all our activities, and we strive to provide a safe and secure environment that delivers inspirational moments, nurtures a safe Movement, realises our collective impact, and realises our full potential at both Games-time and in our day-to-day activities."

4. POLICY STATEMENT

4.1 The CGF is fully committed to protecting any individual associated with the CGF – but in particular children and adults at risk - from all forms of harm and/or abuse, and to ensure appropriate action is taken if such harm occurs or is suspected. The CGF's key safeguarding principles are as follows:

4.2 The welfare of children and adults at risk is paramount.

4.3 Sport should be an environment that is respectful, ethical, and free from all forms of non-accidental harm ('Safe Sport').

4.4 No child and adult at risk (or other individual) should experience abuse of any kind and all covered persons have a duty of care and a responsibility to promote the welfare of children and adults at risk and to keep them safe.

- 4.5 Every child and adult at risk, regardless of age, ability or disability, gender, gender identity, marital status, pregnancy or maternity, race, religion or belief, sex, sexual orientation, language, socio-economic background or identity, or migration status has an equal right to protection from all forms of harm or abuse.
- 4.6 Children from minority ethnic groups, children with disabilities and adults at risk have additional needs and may face additional barriers, so additional protective measures to safeguard them should be put in place.
- 4.7 Safeguarding is everyone's responsibility and the CGF has a particular responsibility to ensure best safeguarding practice is expected and normalised across the Movement and it becomes part of the CGF's organisational culture. Poor practice will be challenged when it occurs.
- 4.8 Everyone coming into contact with the CGF will be safeguarded including CGF staff and volunteers (the welfare of the CGF's staff and volunteers is addressed in more details in the CGF's Employee Handbook).
- 4.9 All of the CGF's employees, associates, and partners are expected to understand their role and responsibilities, and to know how to respond when a safeguarding concern is raised.
- 4.10 All children and adults at risk should be empowered and encouraged to fulfil their own potential. Decisions made about children and adults at risk will be made, as far as possible, with their participation and in their best interest; giving full consideration to how such decisions will affect them.
- 4.11 Children and adults at risk will be encouraged to express their views to shape the CGF's organisational response to safeguarding.
- 4.12 Any employee reporting a concern in good faith regarding any member of the Commonwealth Sport Movement will be protected under the CGF Whistleblowing Policy.

5. **COMMITMENT:**

As part of its approach to safeguarding, the CGF will:

- 5.1 Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns.
- 5.2 Respond promptly to any safeguarding concerns, taking into consideration any additional needs and vulnerabilities of both adults and children.
- 5.3 Provide support to the individual/s who raise a concern or disclosure.
- 5.4 Ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored in line with the CGF's 'Confidentiality Policy' and any other CGF policies or procedures relating to the creation and retention of confidential records.
- 5.5 Ensure recruitment processes are in place in line with safeguarding best practices ("safer recruitment").
- 5.6 Ensure robust safeguarding arrangements and procedures are in operation.

- 5.7 Ensure that Organising Committees of Commonwealth Games and Commonwealth Youth Games and their partners and suppliers will have in place safeguarding standards equivalent to this policy and in keeping with best practice for major events.

6. **WORKING WITH PARTNER ORGANISATIONS**

- 6.1 The CGF expects that shared principles and values will mean that partner organisations will fully support the values and commitments set out in this policy. CGF recognises that those with safeguarding policies and associated measures already in place will be best equipped to comply with the standards set out in this policy.
- 6.2 Where CGF works with others - for example, by supporting a project or programme or by running collaborative projects or events - legal agreements will include safeguarding requirements (including compliance with policies and legislation, safer recruitment and the appropriate reporting and management of any safeguarding incident or concern).

C. **DEALING WITH CONCERNS**

7. **REPORTING A CONCERN**

- 7.1 Any safeguarding concerns, including concerns about the conduct of a member of staff, trustees, volunteers, or contractors should be reported to safeguarding@thecgf.com in line with this Safeguarding policy
- 7.2 The CGF wants to be presented with any information, from any source, where there is reason to believe that someone involved with or connected to CGF/its activities has (1) harmed and/or presents a risk of harm to any children or athletes/adults at risk, or (2) engaged in poor practice.
- 7.3 CGF will support those who wish to make a report and provide such guidance as might be necessary or desirable in relation to the making of a report, whether the person making the report is someone who is reporting conduct that has directly affected them, conduct that has (or might have) affected one or more others, or they are reporting a concern that someone presents a risk of harm (even if they are not aware of any specific conduct).
- 7.4 All safeguarding concerns and any discussions about a child or athlete/adult at risk's welfare should be recorded accurately in writing whether or not further action is taken and should follow the Safeguarding Adult at Risk Procedure or Safeguarding Children Procedure.
- 7.5 It is important to remember that the information provided could be used as evidence should there be any formal investigation. When reporting a concern to CGF in respect of another person who has been abused/harmed (or might have suffered abuse/harm), the person making the report should:
- not seek to determine if the person has been abused or is otherwise at risk of harm (it is not the responsibility of the person making the report to do so);
 - focus on facts rather than opinion, i.e., what exactly has been observed, seen, heard, or disclosed; and
 - distinguish clearly between what the person making the report knows first-hand, and what they have been told by others.

7.6 **RESPONDING TO REPORTS**

- 7.1 All safeguarding cases progressed by CGF will be addressed in accordance with the Safeguarding Adults at Risk Procedure or Safeguarding Children Regulations.
- 7.2 CGF's initial response to a safeguarding report will depend on the nature of the concern and its specific facts.
- 7.3 Where safeguarding concerns are reported to CGF by another body within the Movement or within sport, CGF will liaise with that organisation to determine the most appropriate response.
- 7.4 CGF will share information and work in partnership with local child protection and social care teams, local police and any other appropriate authorities/bodies, including International Federations (IFs) and Commonwealth Games Associations (CGAs) in accordance with their procedures, in order to enable them to carry out their duties to investigate concerns and protect children and athletes/adults at risk.
- 7.5 The amount of contact required between the maker of a report and those addressing the report will vary depending on the nature of the concern and its specific facts and whether further information or clarification is required.
- 7.6 It is unlikely that it will be possible in any case to determine exact timescales for when reports will be resolved. However, CGF will seek to respond to any report as quickly as the circumstances require, and in any event within [2] working days of its receipt of the report. CGF will always try to ensure that all parties know what procedure will be followed and what the expected timescales are, as well as any changes to those timescales and why. Wherever possible, CGF will also seek to agree to provide regular updates to the report maker and any other appropriate person(s), at such frequency and in such manner as requested by the report maker and any other appropriate person.
- 7.7 Whilst the welfare of children and adults at risk is paramount, CGF recognises it also has a duty to those accused of harming others and/or who are suspected of posing a risk of such harm. Consideration will therefore be given in each case as to what level of support should be provided to such persons on a case by case basis, and this may include such things as being provided with a dedicated point of contact at CGF (not directly involved with any relevant investigation), access to support services, and access to pro bono legal advice.

D. LAWS AND REGULATIONS

9. As an organisation based in England, this policy has been developed in accordance with relevant legislation and statutory guidance applicable in England.
- 9.1 However, as an organisation working internationally, the CGF works across a range of legal and regulatory jurisdictions, and the national laws and regulations of a relevant territory will also be acknowledged and respected where possible.

ANNEX 1: TYPES OF ABUSE COVERED BY THIS POLICY²

Please note:

- All these types of abuse can happen outside the sport environment and it is important that, if an individual becomes aware of any, they are appropriately reported.
- Individuals can be subject to multiple forms of abuse at the same time

“Bullying (or Cyberbullying)” Unwanted, unwelcomed, repetitive, and intentional aggressive physical or verbal behaviour (which can be amongst peers) that can entail a real or perceived power imbalance. Bullying can involve making threats, deliberately excluding someone, spreading rumours (whether founded or unfounded). Bullying is very different from a spirit of ‘camaraderie’.

“Child Sexual Exploitation (CSE)” Child Sexual Exploitation is a form of child sexual abuse in which a person(s), of any age takes advantage of a power imbalance to force or entice a child into engaging in sexual activity in return for something received by the child and/or those perpetrating or facilitating the abuse. As with other forms of child sexual abuse, the presence of perceived consent does not undermine the abusive nature of the act. Please remember a child cannot consent to its own exploitation. CSE can include both contact and non-contact sexual activity, in person or online.

“Complicity” This is when an individual or organisation authorises, causes, or knowingly assists, encourages, aids and incites, covers up, or is otherwise complicit in, any act or omission by any person involving a violation of this Policy.

“Emotional/Psychological Abuse” These are acts that deliberately harm a child, adult or adult at risk’s mental health. Emotional abuse is when adults deny children or adults at risk love or affection, or constantly threaten or humiliate them. It is the continual emotional abuse of a child, adult or adult at risk that causes severe and persistent adverse effects on the child’s emotional development and adversely impacts on an adult or adult at risk. Some level of emotional abuse is often involved in different types of abuse so emotional/ psychological abuse may not be in isolation. Emotional abuse undermines a child, adult or adult at risk’s confidence and sense of self-worth.

“Financial abuse” Financial abuse is the use or misuse of finances to gain control over an individual current or future financial freedom and decision making. It restricts individual’s freedom and dignity; it is often part of a pattern of coercive control.

“Grooming” Manipulative behaviours used to coerce children, adult, or adult at risk to agree to the abuse. Grooming can take place online or in-person and varies in timeframe (from a few minutes to taking place over years).

“Hazing” An arranged, usually team-based, form of bullying involving degrading and dangerous initiation of new (team) members.

“Inducement” This is when an individual or organisation solicits, instructs, persuades, or encourages any person to engage in conduct (whether by act or omission) involving a violation of this Policy.

“Modern Slavery” This is the exploitation of people for personal or commercial gain where a person is owned or controlled by another individual (employer/agent). Individuals subject to this form of abuse are treated as a commodity and have restrictions of freedoms. Modern Slavery can be linked to human trafficking. Please refer to CGF’s Modern Slavery Statement for full details.

“Neglect” Neglect is the persistent failure to meet a child or adult at risk’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development (e.g. failure to provide adequate food, shelter, clothing). Neglect is also manifested in failure to protect a child or vulnerable adult from physical harm or danger, failure to ensure adequate supervision (including the use of inadequate care givers) or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child or adults at risk basic emotional needs.

“Peer on peer abuse” This form of abuse refers to children and it occurs when there is any kind of physical, sexual, emotional, or financial abuse or coercive control exercised between children. It includes bullying, cyberbullying, sexual violence, harassment, and sexting. Please note that the behaviour in question is harmful to both children.

“Physical Abuse” this is when non-accidental harm occurs. A child or adult is hurt or injured by a child or an adult (by for example imposing forced routines, age-inappropriate/physical inappropriate and/or inappropriate physical training, etc.). Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, biting, hitting, or punching. Imposing the consumption of doping substances is also considered abuse. Female Genital Mutilation (FGM) is a form of physical abuse which is illegal in the UK. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child or adult at risk they are looking after.

“Sexual Abuse” Any conduct of sexual nature, whether through contact or penetrative or non-contact (e.g., voyeurism, exhibitionism), where consent is not obtained, consent is coerced or consent cannot be given. Sexual abuse can include kissing, touching the individual’s genitals or breasts, vaginal, anal intercourse, digital penetration, oral sex, exposures, sexting (sending sexual messages or pictures via mobile phone text or Apps), grooming (including online), sexual activity over the phone or online. Encouraging a child or adult at risk to look at pornographic material (e.g., video, pictures) is also considered sexual abuse.

“Sexual Harassment” Any verbal or physical conduct of a sexual nature, which is unwelcome or unwanted, or where consent is coerced, manipulated or cannot be given. Sexual harassment disrespects the dignity of a person and creates an abusive and offensive environment. Sexual harassment can be classed as a form of sexual abuse.

² Many definitions listed in this policy are taken from the following papers:

- Johnson, J. and Holman, M. (2004). *Making the Team: Inside the World of Sport Initiations and Hazing*, Canadian Scholars’ Press, Toronto
- David, P. (2005), *Human Rights in Youth Sport: A critical review of children’s rights in competitive sport*. Routledge
- European Commission (2019) *Safeguarding Children in sport. A mapping study*. Brussels, European Commission Director General for Education and Sport.