



SAFEGUARDING POLICY

for

Children, Young People & Vulnerable Adults

Approved by Board of Trustees on 16 September 2025

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1. Executive Summary

1.1. About Laureus Sport for Good

The Laureus Sport for Good Foundation was founded to fund and promote the use of sport as a tool to tackle social problems worldwide. As a key player in the sport for development field Laureus Sport for Good funds and supports a global network of community-based sports projects impacting the lives of children and young people. The key beneficiaries of sport for good are children, young people and vulnerable adults. Hence it is imperative that robust policies and procedures are in place to ensure that Laureus Sport for Good manages and mitigates risks in relation to the safeguarding and protection of children, young people and vulnerable adults around the globe.

Laureus Sport for Good recognizes that the welfare and interests of all participants in programmes and activities supported and endorsed by Laureus Sport for Good are paramount in all circumstances. As part of this recognition, Laureus Sport for Good has taken the pledge in favour of the International Safeguards for Children in Sport¹:

- ☐ *We are committed to working towards safer sport for children, young people and vulnerable adults.*
- ☐ *To support this, we will promote and advocate for safeguards through our networks, and commit to embedding them in our work.*

Our commitment stretches to also include young people and vulnerable adults.

This Safeguarding Policy provides a set of guiding principles and procedures to ensure that Laureus Sport for Good continues to do all in its power to protect and empower the children, young people and vulnerable adults it impacts upon, wherever they may be.

For the purpose of this Policy:

- A 'child' refers to an individual under the age of 18;
- A 'vulnerable adult' refers to an individual who has the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations.
- An adult may be vulnerable if he/she/they:
 - Has a learning or physical disability.
 - Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
 - Has a reduction in physical or mental capacity.
 - Is in the receipt of any form of healthcare.
 - Is detained in custody.
 - Is under care.
 - Is receiving community or social services because of age, health or disability.
 - Is living in sheltered or residential care home.
 - Is unable, for any other reason, to protect himself/herself/themselves against significant harm or exploitation.

¹ <https://www.sportanddev.org/en/toolkit/child-protection-and-safeguarding/international-safeguards-children-sport>

- Exposed to other reasons which put him/her/them at increased risk of harm and abuse.
- A 'young person' refers to a person who is still in the 'child' bracket (i.e. under 18 y/o) but who mostly take their own decisions. The term does not have a legal implication but is being used as a more empowering term for young people under the age of 18 y/o who do not self-identify as children.
- 'Child abuse or maltreatment' constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, deliberate neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power (as defined further in Annex 5).
- 'Laureus Sport for Good' means, Laureus Sport for Good Foundation, Laureus World Sports Awards Limited and all Laureus Sport for Good National Foundations.
- 'Working with children, young people and vulnerable adults' is defined as those who are engaged in an activity, on behalf of or funded by Laureus Sport for Good, which involves direct contact with, or facilitates access to, children, young people and vulnerable adults.

This Policy is based on the UN Convention on the Rights of the Child 1989, the National Child Protection Legislation in the UK-Working together to safeguard children (Department for Education, 2018), the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014 and related legislation, as well as wider international best practice, including the International Safeguards for Children in Sport 2016.

1.2. Child, young person and vulnerable adult safeguarding the definitions

Laureus Sport for Good defines Safeguarding as the action that is taken to promote the welfare of children, young people and vulnerable adults and protect them from harm.

Child, young person and vulnerable adult protection is part of the safeguarding process and focuses on protecting individual children, young people and vulnerable adults identified as suffering or likely to suffer significant harm. This includes child, young people and vulnerable adult protection procedures which detail how to respond to concerns about a child, young person or a vulnerable adult.

1.3. Child Safeguarding Principles

Whilst the following principles have been developed in relation to children, for the purpose of this Policy they have been expanded to include young people and vulnerable adults:

- All children, young people and vulnerable adults have the right to participate, enjoy and develop through sport and otherwise, in a safe and inclusive environment, free from all forms of abuse, violence, deliberate neglect and exploitation.
- All individuals and organisations working with children, young people and vulnerable adults directly or indirectly, including both service providers and funders, have a responsibility to foster the care and protection of the children, young people and

vulnerable adults they (impact on) and act at all times in the best interests of the child, young person or vulnerable adult.

- Some children, young people or vulnerable adults are more vulnerable than others to abuse, and organisations working with children, young people or vulnerable adult need to take steps to assess and address the different levels of risk that children, young people or vulnerable adults in their programmes may face.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, and beliefs, religious or political affiliation.

Laureus Sport for Good's work is focused on children and young people, but even though the policy is developed with this population in focus, the guidelines cover everyone participating in programmes or activities supported or endorsed by Laureus Sport for Good.

1.4. Who does the policy apply to?

All stakeholders this Policy apply to (see list below) should have a basic awareness of safeguarding issues, including:

- Being alert to the possibility of abuse and neglect in any shape or form.
- Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances.
- Knowing who in the organisation to raise concerns with.
- Being competent to take the appropriate immediate or emergency action.

This Policy applies to:

- Employees of Laureus Sport for Good Foundation, Laureus World Sports Awards Limited and all Laureus Sport for Good National Foundations.
- Trustees of the Laureus Sport for Good Foundation and all Laureus Sport for Good National Foundations.
- Associates which include Laureus World Sports Academy and Laureus Ambassadors, patrons and sponsors together with any Laureus Sport for Good volunteers and visitors to grantees and to any event involving children, young people and/or vulnerable adults.
- Volunteers of Laureus Sport for Good Foundation, Laureus World Sports Awards Limited and all Laureus Sport for Good National Foundations.
- Contractors which include any organisation or individual which Laureus Sport for Good entity instructs to deliver services (including consultants and service providers).

- Grantees which includes any organisation funded by Laureus Sport for Good or by a Laureus National Sport for Good Foundation to deliver social programmes.

Anyone this Policy applies to must sign and return to the Global Safeguarding Officer or the relevant National Foundation Safeguarding Officer the Annex 1: Commitment to Laureus Sport for Good's Child, Young People and Vulnerable Adult Safeguarding Policy.

2. Code of Conduct

Laureus Sport for Good requires that its employees, trustees, associates, volunteers, contractors and grantees comply with this Code of Conduct.

All those covered by this Code commit to respecting, promoting, upholding and protecting, at all times, the rights of the child as set out in the UN Convention on the Rights of the Child 1989, and the International Safeguards for Children in Sport 2016. The standards of behaviour set by the Code are required of all those covered by this Policy in respect of their conduct towards all children and vulnerable young people. Anyone found to be in breach of the Code, will be subject to disciplinary action, up to and including dismissal or termination of employment or other arrangement with their employer.

All those covered by this Code, working within the United Kingdom, additionally commit to respecting, promoting, upholding and protecting, at all times, the National Child Protection Legislation in the UK 2018, as well as the rights of vulnerable adults as outlined in the Care Standards Act 2000.

This Code of Conduct is designed primarily to protect children, young people and vulnerable adults, however it also serves to protect those covered from false accusations and the reputation of Laureus Sport for Good and its partners.

2.1. Acceptable behaviour and conduct:

- Always treat children, young people and vulnerable adults with respect regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status.
- Be committed to creating a culture of openness and mutual accountability to enable all children, young people and vulnerable adults, protection concerns to be raised and discussed and where abusive behaviour can and must be challenged.
- Take steps to educate children, young people and vulnerable adults, as well as their parents/guardians/carers and support networks, on the policy, inviting their contribution and involvement in communicating the policy and encouraging them to voice any concerns they have in a safe way.
- Use language or behaviour towards children, young people and vulnerable adults that is at all times appropriate and in no way harassing, abusive, sexually provocative or demeaning.
- Wherever possible, ensure that more than one adult is present when working in the proximity of children, young people and/or vulnerable adults.

- Ensure physical contact is at all times appropriate within the cultural context and not an invasion of the child, young person and/or vulnerable adult's privacy.
- Use positive, non-violent methods to manage a child or other person's behaviour.
- raise any concerns of inappropriate behaviour immediately.
- Comply with any investigation (including interviews) and make available and share any documentation or information necessary for completion of the investigation.
- Ensure that anyone engaging with children, young people and vulnerable adults know their obligations to comply with this policy.

2.2. Unacceptable behaviour and conduct;

- Sexual activity with children, young people and vulnerable adults is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Engaging children, young people and vulnerable adults in any form of sexual activity, including paying for sexual services, i.e. exchange of money, employment, goods, or services, is prohibited.
- Use of any device to access, view, create, download or distribute sexual images of children, young people, vulnerable adults or any other people, is prohibited.
- Recording audio/video and taking photos of children, young people and vulnerable adults without their consent and the consent of their parents/guardians/carers is prohibited.
- Physical punishment or discipline or use of physical force of any kind towards children and vulnerable adults is prohibited.
- The use of children, young people and vulnerable adults for domestic or other labour is prohibited when it is inappropriate for the person's age or developmental capacity, in breach of local law, interferes with the time available for education and recreational activities, or places him, her or them at significant risk of injury, exploitation or abuse.
- It is inappropriate to spend time alone with children, young people and vulnerable adults away from others or to take other people's children, young people or vulnerable adults to your home, especially where they will be alone with you.
- Do things of a personal nature for a child, young person or vulnerable adult that they could do for themselves.
- Demonstrating or giving preferential treatment to a particular person, child, young person or adult, to the exclusion of others (for example, promising gifts or enticements).

- Be intoxicated (under the influence of alcohol or drugs) prior to working with children, young people, vulnerable adults or any other people.
- Act in ways, whether intended or not, that shame, humiliate, belittle or degrade children, young people, vulnerable adults or other people, or otherwise perpetrate any form of abuse.
- Take a child, young person or vulnerable adult alone in a vehicle unless it's absolutely necessary and with parental and managerial consent.
- Leave children, young people and vulnerable adults unsupervised with a visitor to a project.
- Exchange personal information and contact information with a child, young person or vulnerable adult.

Please note that this is not an exhaustive list and if you feel unsure about a situation or how to respond to a particular situation, you must seek guidance from a Laureus Sport for Good representative or the Global Child Safeguarding Officer or Coordinator.

3. Reporting of Safeguarding Concerns

- All those covered by the Safeguarding Policy for children, young people and vulnerable adults should immediately report any concerns, suspicions, and incidents, disclosures made to them or allegations of actual or potential child abuse or any breach of the Safeguarding Policy for children and vulnerable adults to the Global Child Safeguarding Officer.
- If the incident or alleged incident takes place during an event which Laureus Sport for Good is involved with then the report should be made to any onsite Laureus Staff and notified to the Global Child Safeguarding Officer or Coordinator immediately but no later than within 24 hours.
- Where the risk of harm to the child, young person or vulnerable adult is high or if there is a medical emergency or if a crime has been committed or suspected, then the designated child safeguarding officer should immediately report the matter to the emergency services and/or to local law enforcement.
- No person who makes a report in good faith will be subject to any form of retaliation.
- A person may also make a report on an anonymous basis to safeguarding@laureus.com.
- Any breaches of this Code of Conduct will be subject to disciplinary proceedings.

4. Safeguarding Procedures

Laureus Sport for Good requires that its employees, trustees, associates, volunteers, contractors and grantees to comply with these Procedures as a matter of good practice.

4.1. Risk Assessment

Laureus Sport for Good will conduct a risk assessment of its operations (including on- and offline events), programmes and project activities. Risk mitigation strategies will be developed, which minimise the risk to children, young people and vulnerable adults, and incorporated into the operation of Laureus Sport for Good and activities which involve working with or impact upon children, young people and vulnerable adults. In addition, employees, trustees, associates, volunteers, contractors, grantees on project visits will carry out appropriate risk assessments prior to project visits.

A format of the Risk Assessment is set out in Annex 2. Guidance on online safeguarding is set out in Annex 7.

4.2. Recruitment and selection of employees

Laureus Sport for Good acknowledges that creating a safe environment for children, young people and vulnerable adults and starts with the appointment of suitably qualified, skilled and vetted employees that have the desired competencies and skills to carry out their function in an effective, efficient and safe manner.

Laureus Sport for Good's employee recruitment and on boarding processes reflect our commitment to protect children, young people and vulnerable adults and prevent abuse.

This includes:

- Pre-appointment background checks - Disclosure Barring Checks (or equivalent) checks on new staff.
- Candidates will have their most recent employment history verified - including an investigation of any gaps between jobs.
- Candidates will have their identity checked and verified against original identification documents such as their passport and photo card license. They will be asked at the point of application to certify that the information provided as part of their application is correct to the best of their knowledge and belief and sign the declaration.
- Candidates will be asked, if relevant to their role, specific safeguarding related questions during their interview.
- Candidates should provide two satisfactory referees who will be asked, if relevant to the role, about the candidate's experience in working with children, young people and/or vulnerable adults and to disclose any concerns that they may have about the candidate's suitability to work with such groups.
- Once staff are recruited, they will be adequately trained and supervised to ensure that any risks to children, young people and vulnerable adults are minimised. It is mandatory for anyone engaging directly with children, young people and vulnerable adults to take an online training course according to their role:
 - Safeguarding officers: level 3 safeguarding
 - Programmes and Grants managers: level 2 safeguarding

- Development and communications staff with occasional interaction with programme participants: level 1 safeguarding
- Finance, Academy, Ambassadors, etc: signing the annex 1 from the policy, committing to complying with Laureus' safeguarding policy.

This will be achieved through ensuring that:

- Relevant child protection and safeguarding training – including a comprehensive induction to organisational child, young person and vulnerable adult safeguarding policies and procedures and regular opportunities to update training.
- As part of the level 1-3 training, employees will be tested to pass the training. It will be requested of the employee to show the accreditation to their line manager and to the global safeguarding officer within 3 months from contract start.
- Employees will be asked to confirm annually that they have read the Safeguarding Policy and that they agree to abide by it. This will form part of the annual Performance Management Process. See Annex 1.
- Employees will have access to support regarding all aspects of child, young person and vulnerable adult safeguarding and the implementation of the policy via the Global Child Safeguarding Officer and the Company Secretary.
- Employees will be informed about the use of technology (such as computers and mobile phones), and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or images that are harmful for or to children or young people and that may place them in danger or cause them distress.

4.3. Engaging Contractors

When engaging Contractors to deliver services, responsibility rests with those Contractors to ensure that those delivering the service on their behalf understand the obligations and commitments outlined in this Safeguarding Policy. Laureus Sport for Good standard form contracts include this obligation. If the Contractor is or may be involved in any activities involving children, young persons or vulnerable adults they will procure that their relevant staff and/or contractors sign the form as set out in Annex 1 to confirm that they have read and understood the Code of Conduct. The Safeguarding Policy is deemed incorporated into standard form Contracts.

4.4. Working with Grantees

The Laureus Sport for Good and each Laureus Sport for Good National Foundation requires that all of its Grantees develop and implement their own child, young person and vulnerable adult safeguarding policies, protocols and procedures which clearly set out the procedures, as well as the measures in place for implementation and training, communication of their child, young person and vulnerable adult safeguarding policy and monitoring and review. Grantee's policies and procedures, or their plans to develop these, are a condition of funding and will be monitored during the grant management cycle. Laureus Sport for Good will, where possible, endeavour to provide support for grantees to develop and implement robust child and vulnerable adult safeguarding policies and procedures. Grantees that do not have appropriate child, young person and vulnerable adult safeguarding policies and procedures in place will be given 6 months to develop these and will have

the opportunity to allocate a portion of their grant towards this if needed. Grantees must demonstrate to Laureus Sport for Good that appropriate child and vulnerable adult safeguarding policies and procedures are in place and that they are being adhered to by staff. Grantees who fail to develop appropriate child and vulnerable adult safeguarding policies and procedures within 6 months will have their funding suspended until they have appropriate policies and procedures in place.

For grantees who wish to provide online engagement with children, young people and vulnerable adults, they must include a section on online safeguarding in the child, young person and vulnerable adult safeguarding policy. Please find guidance for online safeguarding in Annex 7 – Keeping Children, Young People and Vulnerable Adults safe online.

Grantees must sign and return to Laureus Sport for Good Annex 1: Commitment to Laureus Sport for Good's Child, Young Person and Vulnerable Adult Safeguarding Policy, unless their existing safeguarding policy is assessed to be at the same level or better than that of Laureus Sport for Good.

For Sport for Good City programmes and other complex thematic programmes, please consult with guidelines in Annex 4 – Safeguarding at Laureus Sport for Good City Thematic Programmes.

From 2nd January 2023, all new grant contracts must include the condition that the committed payments are conditioned on the grantee taking the pledge to promote and comply with the International Safeguards for Children in Sport. This can currently be done via this website: <https://safeinsport.org/>

4.5. Managing child, young person and vulnerable adult safeguarding risks during Laureus Sport for Good events

Laureus Sport for Good will ensure to the best of its ability that children, young people and vulnerable adults are protected from ill treatment or abuse during any events it directly delivers that bring children and vulnerable adults into contact with adults.

Specifically:

- Employees, trustees, associates, volunteers, contractors, grantees and journalists and other guests present are required to adhere to the Safeguarding Policy and will be asked to sign the form as set out in Annex 1 to confirm that they have read and understood the Code of Conduct. Laureus employees are required to monitor the behaviour of adults and children during Laureus Sport for Good events to ensure that the Safeguarding Policy is adhered to and implemented.
- Journalists, photographers and other media people must furthermore comply with guidance outlined in Annex 6: Communications Policy & Code of Conduct for programme visits and other events involving children and young people.
- An adult will be present and designated as an on-site child protection officer at each Laureus Sport for Good event that includes the presence of children, young people or vulnerable adults to deal with reported breaches under the Safeguarding Policy. For larger scale events such as a partnership launch, summit or project visit, where there will be large numbers of children present, the Global Child Safeguarding Officer will ensure that a risk assessment is conducted and an appropriate child,

young person and vulnerable adult safeguarding risk mitigation plan is implemented specific to the event.

4.6. Use of media

Laureus Sport for Good will ensure that all images of children, young people and vulnerable adults it uses for internal or external communication, in whichever format, are appropriate and do not in any way exacerbate risks to children, young people and vulnerable adults.

Specifically, Laureus Sport for Good will ensure that:

- If photographic or video content is going to be captured during a Laureus Sport for Good event, all children, young people or vulnerable adults attending and, when so required, their parents/guardians/carers will be informed beforehand that their consent to being featured in such content is required and given the opportunity to opt out of participating. Partner organisations will need to sign a release stating that young people present at the event have consented to being featured in photographic or video content. No content of children, young people and vulnerable adults, specifically portrayed, will be used unless Laureus Sport for Good is confident that informed consent has been provided. This shall be done through formal agreements including grant agreements and a separate project release form as well as by those responsible for events.
- Inappropriate images of children, young people or vulnerable adults (e.g. that could be deemed to be sexual or to portray nudity) will never be used.
- Images of children, young people or vulnerable adults that portray them in a demeaning or disrespectful light will never be used.
- Images of children, young people or vulnerable adults will not be accompanied by personal identification information such as name and place of abode, where this could make the individual easily identifiable and traceable.
- The use of images of children, young people or vulnerable adults, where the individual has already suffered abuse will not be used unless additional protections such as use of their voice only, pseudonym used, location never revealed, the individual does not appear in any visual footage unless there are absolute exceptional circumstances.

Please see further guidance in Annex 6: Communications Policy & Code of Conduct for programme visits and other events involving children, young people and vulnerable adults.

4.7. Managing a disclosure

Laureus Sport for Good is committed to acting upon and investigating disclosures of child, young person and vulnerable adult safeguarding concerns swiftly. At all times, the welfare of the individual is of paramount consideration.

If a child, young person or vulnerable adult discloses that he/she/they, or someone they know is being abused, Laureus Sport for Good representatives must listen to the individual and accept what is being said; allow the individual to speak freely, ask only open questions to establish the basic facts

or nature of the complaint. It is not the responsibility of the employee to decide whether or not abuse has taken place, as well as the type of abuse, it is their responsibility to report this to the Global Child Safeguarding Officer or Coordinator.

They should reassure the individual that they have done the right thing by disclosing what is happening to them. However total confidentiality must never be promised as information will need to be shared if the individual is at risk. The Global Child Safeguarding Officer or Coordinator will advise on the process if a disclosure is made as set out below.

5. Responding to concerns

Please see Annex 11: Safeguarding Disclosure Flowchart for a quick overview of the reporting process. The process for reporting and processing disclosures or suspected breaches of this Safeguarding Policy is as follows:

- Any disclosure, concern, suspicion, incident or allegation of actual or potential abuse of a child, young person or vulnerable adult or a breach of this Safeguarding Policy should be reported to the Global Child Safeguarding Officer or Co-ordinator within 24 hours.
- If the incident or alleged incident takes place during an event which Laureus Sport for Good is involved with then the report should be made to the designated On Site Child Protection Officer and notified to the Global Child Safeguarding Officer immediately but no later than within 24 hours.
- At all times, confidentiality must be maintained. All written correspondence must be marked “Strictly Confidential - Addressee only” and sent to those on a “need-to-know basis” only. No correspondence should ever be sent via fax or using channels of communication where information can be freely intercepted by others such as a generic email address which is accessible to all. The safeguarding@laureus.com email account is only accessed by the Global Safeguarding Officer and the Safeguarding Coordinator.
- Where the risk of harm to the individual is high or if there is a medical emergency or if a crime has been committed or suspected, then the designated On Site Child Protection Officer should immediately report the matter to the emergency services and/or to local law enforcement, and shall then complete the notification to the Global Child Safeguarding Officer.
- Laureus Sport for Good employee or the person making the notification should prepare a written notification of the incident in the form set out in Annex 3 (“Report”) providing as much detail of the incident or suspicion as possible. The Report should be passed to the Global Child Safeguarding Officer immediately but no later than within 24 hours.
- A person may also make a report on an anonymous basis to safeguarding@laureus.com

- If the incident happens during a Laureus Sport for Good event, the Laureus Sport for Good employee should also immediately report it to the designated On Site Child Safeguarding Officer which will be identified as part of the event activity.
- The Global Child Safeguarding Officer will investigate the incident on a confidential basis and will work with the Safeguarding lead of the Board of Trustees and/or the director of the entity involved together with the Company Secretary and HR Manager (if relevant), to take appropriate action. The Global Child Safeguarding Officer may include other persons as deemed necessary for their advice or expertise.
- The Global Child Safeguarding Officer will undertake a thorough investigation if the matter is a breach of this Policy.
- The investigation should be complete within 2 weeks of the initial notification with feedback to the relevant parties with clear next steps or such shorter period as may be required due to the nature and seriousness of the breach.

The investigation process will include:

- If the child, young person or vulnerable adult is at immediate risk, or needs immediate support, there is an immediate need to contact local social care services. This should be done in coordination with the Global Child Safeguarding Officer.
- If the incident is a criminal matter, the police or appropriate law enforcement should immediately be contacted.
- Where the incident concerns a Contractor, the case may need to be notified to the Contractor organisation (CEO/HR/Compliance), and followed up in due course.
- Where the incident concerns a Laureus Sport for Good employee, trustee, associate, volunteers, contractors, the Global Child Safeguarding Officer, the relevant CEO/Chair, Compliance Officer and HR Manager will together decide on the appropriate course of action which may include disciplinary and/or dismissal proceedings. If the matter has resulted in a formal police investigation, the Global Child Safeguarding Officer and the investigation team will work alongside the police until resolution.
- In situations where Laureus Sport for Good representatives overseas are suspected to be involved, either as the victim or the perpetrator, the local relevant in-country embassy should be informed regardless of diplomatic status. In countries where there are weak laws to protect children, young person and vulnerable adults, perpetrators can be prosecuted in their own home country. Contact with embassies ensures that evidence and information is collected in the appropriate way and that support is offered to victims.

On completion of the investigation, the Global Child Safeguarding Officer will:

- Report the allegation, investigation and findings to the relevant Board of Trustees.
- Facilitate the legally required reporting of all serious safeguarding incidents to the UK Charity Commission.

- Make any necessary recommendations to amend the Safeguarding Policy and any procedures to mitigate the risk of the situation reoccurring.
- The Report on the issue will be completed and stored securely and confidentially with the Company Secretary and HR if relevant. The Report will be shared on a “need to know basis” only.

Laureus Sport for Good is committed to responding appropriately, effectively and fairly to all allegations and suspicions of abuse, both current and historical, through reporting mechanisms that are simple, clear, fair and accessible to all stakeholders, including children, young people and vulnerable adults.

There is a mandatory obligation on all employees, trustees, associates, volunteers, contractors and grantees to report concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children, young people or vulnerable adults and/or any other breaches of this Safeguarding Policy, through the relevant reporting mechanism set out in this Safeguarding Policy.

All those subject to complaints will be treated fairly and consistent with the principles of natural justice (i.e. rule against bias and the right to a fair hearing). Investigations will be objective, transparent, and will be guided by external professional expertise and support when required. To the extent practical, Laureus Sport for Good will strive to maintain confidentiality to protect the affected individual(s) subject to its goal of engaging in a thorough investigation. Laureus Sport for Good may, however, be required to disclose the allegations or result of the investigation to the relevant authorities.

If a report of abuse is made, or concerns are raised, even if the situation is ultimately found to be untrue, no retaliatory action will be taken against the person making the report. If, however, the report is found to be malicious, the accused employee will be offered support, and HR will decide on the course of action relating to disciplinary and suspension procedures.

Any Laureus Sport for Good employee, trustee, associate, volunteer, contractor found to be the subject of an untrue allegation following an investigation by the Global Child Safeguarding Officer, will be supported by Laureus Sport for Good as may be appropriate.

5.1. Awareness raising and training

Laureus Sport for Good will ensure that all employee, trustee, associate, volunteer, contractor working directly or indirectly with children, young people or vulnerable adults receive appropriate training or briefing on the Safeguarding Policy. This will be conducted regularly by the Global Child Safeguarding Officer or employee assigned to this role.

All employee, trustee, associate, volunteer, contractor will be required to confirm in writing that they have understood and are committed to the Policy in the form set out in Annex 1. It is the responsibility of all Staff to ensure this commitment.

6. Monitoring and review

Laureus Sport for Good will ensure that implementation of this Safeguarding Policy is subject to regular monitoring. The Safeguarding Policy will be reviewed annually and whenever there are

legislative changes or guidance issued that may impact the Safeguarding Policy and appropriate changes will be recommended to the Laureus Sport for Good Board of Trustees for approval.

All child, young person or vulnerable adult safeguarding concerns will be recorded and monitored by the Global Child Safeguarding Officer and will be reported to the relevant Board of Trustees at Board Meetings.

Laureus Sport for Good Foundation, as a UK based charity, is committed to report serious safeguarding incidents to the UK's Charity Commission.

Laureus Sport for Good will include a section on Safeguarding of children, young persons and vulnerable adults on its website and in its annual, public impact reporting.

Annex 1:

Commitment to Laureus Sport for Good’s Child, Young People and Vulnerable Adult Safeguarding Policy

I confirm that I have received a copy of the [Safeguarding Policy for Children, Young People and Vulnerable Adults], including its [Code of Conduct], which I have read and understood.

I understand that I have a responsibility and duty of care to report any concerns I may have with regards to children and vulnerable adults participating in activities hosted or funded by Laureus Sport for Good to a member of Laureus Sport for Good employee or directly to the Global Child Safeguarding Officer.

I agree to abide by the Code of Conduct and good practice and will work with Laureus Sport for Good to ensure the best interests of the child, young person and vulnerable adult are upheld.

I understand that a breach of this policy may result in the suspension of my involvement in Laureus Sport for Good and/or activities hosted and/or funded by Laureus Sport for Good pending the outcome of a safeguarding investigation.

Name:

Signature:

Organisation:

Position:.....

Date:

Annex 2
Risk Assessment

Risk no.	Risk	Severity Risk rating High, Medium or Low	Controls already in place	Likelihood of Occurrence	Prevention - What can be done to mitigate these risks?	Responsible for mitigating risks	Deadline for mitigation

Annex 3:
Child, Young Person and Vulnerable Adult Safeguarding Incident Reporting Form

If you have a concern about a child, young person or vulnerable adult complete this form including as much information as possible.

NOTE: This report is confidential and must not be given to or the contents disclosed to any unauthorised person.

Please return this form to the Global Child Safeguarding Officer at morten.schmidt@laureus.com and/or safeguarding@laureus.com

Case No: [Location ID / Year / No]: (For official use only)

Details of the individual logging the concern:

Name:

Sex: Male ☐ Female ☐ **Age:**

Address:

Telephone:

Mobile:

Email:

Position/relationship to Laureus Sport or Good:

Partner organisation name:

Your relationship to the child / young person/ vulnerable adult:

Child / young person / vulnerable adult details: (Please provide as much detail as possible)

Name:

Sex: Male ☐ Female ☐ **Date of Birth:**

Ethnicity:

Language(s) spoken:

Any known disability:

Any other information:

(What else is known about the child / young person / vulnerable adult? e.g. siblings / anything that could potentially place the child / young person / vulnerable adult at further risk)

.....
.....

Name of parents / legal guardians: (delete as appropriate)

.....

To the best of your knowledge, are the parents / legal guardians aware of the incident(s) that has / have taken place? Yes ☐ No ☐

Additional detail:

.....
.....
.....

Details of your concern: Include the following: Details of the incident (who, what, where, when, date, time), what you observed.

- The nature of alleged abuse (e.g. physical / emotional / sexual...etc.)
- The physical and emotional state of the child / young person / vulnerable adult (describe any cuts, bruises, behaviour / mood changes).
- Did you speak directly to the child/young person / vulnerable adult? Did the child/young person / vulnerable adult report or disclose the abuse? If so, what was said? (Use exact words of the child/young person).
- If the child / young person / vulnerable adult did not report the incident, what made the referrer suspicious?
- Who else witnessed what happened? DETAIL:

Details of person(s) suspected/alleged to have harmed or put a child / young person / vulnerable adult at risk:

Name: **Sex:** Male ☐ Female ☐

Age: **Nationality:**

Address:

Language(s) spoken:

Relationship to victim:

Relationship to Laureus Sport for Good / Partner:

Any other relevant information: (e.g. current whereabouts, when next due in the office...etc.)

.....
.....

Note: the alleged perpetrator must be presumed innocent until proven otherwise.

DO NOT tell the alleged perpetrator that you have submitted this form. The Global Child Safeguarding Officer will advise you on next steps.

Current Safety of the child / young person / vulnerable adult:

Include any immediate safety concerns (e.g. access of alleged perpetrator to the individual, are they displaying behaviour that is a cause for concern or do they have a history of self- harm?):

.....

.....

Has any emergency, medical or other immediate support been provided? If so, what, when and by whom? What else do you believe is required (medically or otherwise)?

.....

.....

Who else is aware of this incident (e.g. national authorities, internally within the organisation, externally, friends, family members...etc.):

.....

.....

Actions taken to date (e.g. referral to police, social services...etc.):

.....

.....

Declaration:

I hereby declare that the above statement is true to the best of my knowledge and belief. I understand that, if it is found that I have withheld information or knowingly included any false or misleading information above, disciplinary procedures will automatically follow.

Full name:

Signature:

Date & time of report being made:

Annex 4

Safeguarding at Laureus Sport for Good City & Thematic Programmes Including Sport for Good Cities, Sector specific programmes, and sub-contracting within grants

Framework for safeguarding of children, young people and vulnerable adults in the context of Sport for Good City Programmes and other complex programmes. This framework is annexed to Laureus Sport for Good's Safeguarding Policy. Global Safeguarding at Laureus Sport for Good: safeguarding@laureus.com.

1. Introduction

Any child, young person or vulnerable adult engaging with a programme or activity supported by Laureus Sport for Good should be and feel safe and protected. The welfare and interests of children, young persons or vulnerable adult are paramount in all circumstances.

To this end, Laureus Sport for Good complies with a Safeguarding Policy, annually reviewed and approved by the Board of Trustees. The Safeguarding Policy provides a set of guiding principles and procedures to ensure that Laureus Sport for Good continues to do all in its power to protect and empower the children, young people and vulnerable adults it impacts upon, wherever they may be. The Safeguarding Policy applies to all Laureus Sport for Good employees, trustees, associates, volunteers, contractors, grantees and other guests. The Safeguarding policy applies to all Laureus Sport for Good's programmes and funding mechanisms and instruments, including the Sport for Good City Initiative and other thematic programmes with multistakeholder engagement, multi-layered interventions, and sub-contracting within grants.

2. Our Safeguarding Principles

- ☐ All children, young people and vulnerable adults have the right to participate, enjoy and develop through sport and otherwise, in a safe and inclusive environment, free from all forms of abuse, violence, deliberate neglect and exploitation.
- ☐ All individuals and organisations working with children, young people and/or vulnerable adults directly or indirectly, including both service providers and funders, have a responsibility to foster the care and protection of the children, young people or vulnerable adult they (impact on) and act at all times in the best interests of the individual.
- ☐ Some children, young people or vulnerable adults are more vulnerable than others to abuse, and organisations working with children need to take steps to assess and address the different levels of risk that individuals in their programmes may face.
- ☐ Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, and beliefs, religious or political affiliation.

Whilst these standards have been developed in relation to children (aged under 18) we also employ them in relation to other stakeholder groups, such as young or vulnerable adults.

3. Speak to us about Safeguarding

You can download our Safeguarding Policy by following this link:

<https://www.laureus.com/policy/safeguarding>. If you have any questions or concerns about Safeguarding in Laureus Sport for Good or a programme supported by us, please contact: safeguarding@laureus.com.

4. Specific measures in Sport for Good City/Thematic/Multi-layered Programmes

It is important to understand that the Global Safeguarding Policy applies to all aspects of Laureus Sport for Good work, without exceptions. This means that the basis for safeguarding in Sport for Good City programmes and any other programme is Laureus' Global Safeguarding Policy.

5. Reporting of Safeguarding Concerns

- ☐ All those covered by the Safeguarding Policy should immediately report any concerns, suspicions, and incidents, disclosures made to them or allegations of actual or potential child abuse or any breach of the Safeguarding Policy to the Global Safeguarding Officer or Safeguarding Coordinator.
- ☐ If the incident or alleged incident takes place in an activity or programme which Laureus Sport for Good is involved with then the report should be made to the designated On Site Child Protection Officer or to the Global Safeguarding Officer immediately no later than within 24 hours. In the case of Sport for Good City, initial report should be made to the Laureus Sport for Good City Programme Manager.
- ☐ Where the risk of harm to the individual is high or if there is a medical emergency then the designated employee should immediately report the matter to the emergency services and/or to local law enforcement if a crime has been committed or suspected. The Sport for Good City team will count on a contact information sheet to support this.
- ☐ No person who makes a report in good faith will be subject to any form of retaliation.
- ☐ A person may also make a report on an anonymous basis to safeguarding@laureus.com.
- ☐ Any breaches of the Code of Conduct listed in the Global Safeguarding Policy will be subject to disciplinary proceedings.

6. In preparation for and during Sport for Good City/Thematic/Multi-layered programmes

In these more complex programmes, Laureus Sport for Good assumes a more active role in programme development and implementation than through our standard funder+ grant making and technical assistance. Therefore, we recognise the need to ensure appropriate implementation in the different stages that these programmes go through:

6.1. Research and scoping

When scoping for themes and areas and organisations in a planned complex programme intervention, stakeholders relevant for safeguarding and protecting children, young persons or vulnerable adults should be identified. This includes relevant contacts in the police and social services as well as organisations offering services in support to children, young persons or vulnerable adults who have been exposed to abuse. A safeguarding contact sheet should be submitted as part of the scoping report.

6.2. Strategy

Building coalition: At some point during the coalition building stage and before moving to stage 3, Implementation, Laureus Sport for Good Global Safeguarding Policy, including this annex, will be presented and discussed at one of the coalition meetings, and participating organisations and other stakeholders will be requested to sign the policy's: Annex 1: Commitment to Laureus Sport for Good Safeguarding Policy.

Setting strategy: As part of a coalition's local/regional/global development strategy, it is expected to explicitly state its compliance with the safeguarding standards set out in Laureus Sport for Good Safeguarding Policy. If local legislation sets higher standards, then the coalition commitment must be to these standards.

6.3. Implementation

Grant making: Only organisations that have already formally committed to complying with Laureus Sport for Good Safeguarding Policy, or stated their explicit will to do so upon contract signature, will be invited to submit proposals for project grants. And as part of Laureus Sport for Good due diligence, only organisations that in their operations commit to complying with our policy and the International Safeguards for Children in Sports will be taken into consideration for grants.

Sub-Granting: Grantees that act as lead grantees in consortia grants or collaborative grants and that will sub-grant or in other ways sub-contract other partners, must ensure that sub-contracted partners comply with the Laureus safeguarding policy. Lead grantee partners must also ensure that sub-contracted partners, have a mutually signed formal agreement to comply with the lead grantee's safeguarding policy.

Capacity Building: The programme process allow for a wide range of capacity development and training of participants. Organisations who have committed to Laureus Sport for Good Safeguarding Policy, but who do not yet have adequate policy, procedures and capacity in place, may be offered and, if so, expected to participate in safeguarding training.

6.4. Phasing-out

After a number of years, how many will depend on the need for continued backbone support, Laureus Sport for Good will reduce and eventually phase out of its more complex programmes, leaving behind a legacy of ample coordination and collaboration between organisations and other actors with a stake in the social development of the community. As part of this process, the executive body of the programme coalition, with support from Laureus Sport for Good, will develop and assume the responsibility of implementing a safeguarding policy and procedures for the coalition.

Annex 5

Definitions of Harm

It is difficult to define 'harm' to children , young persons and vulnerable adults because they can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, community or faith setting, or via social media/internet. They may be harmed by an adult or adults or another child/children, young person/s or vulnerable adult(s). There are also practices such as female genital mutilation (FGM) that cause significant harm to children.

The following definitions can be used as a guide:

Physical abuse: actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child/young person.

Sexual abuse: forcing or enticing a child / young person / vulnerable adult to take part in sexual activities that he or she or they do not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non- penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children, young person or vulnerable adult in looking at, or producing sexual images, watching sexual activities and encouraging children / young person's /vulnerable adults to behave in sexually inappropriate ways. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children / young person's / venerable adults and adults as consensual. The perpetrator may be an adult or child.

Child / young person / vulnerable adult sexual exploitation: a form of sexual abuse that involves children / young person's / vulnerable adult being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child / young person / vulnerable adult being manipulated or coerced, which may involve befriending children / young person's / vulnerable adult, gaining their trust, and subjecting them to drugs and alcohol. As with sexual abuse, above, the abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children / young person's / vulnerable adult and persons as consensual.

Child / young person / vulnerable adult sexual exploitation manifests in different ways: It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve young peers, children, young persons or vulnerable adults, manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple adult persons.

Neglect and negligent treatment: allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child / young person / vulnerable adult's basic physical and / or psychological needs, which is likely to result in serious impairment of a child / young person vulnerable adult's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children / young person / vulnerable adults from harm and provide for nutrition, shelter and safe living / working conditions. It may also involve

maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child / young person / vulnerable person.

Emotional abuse: persistent emotional maltreatment that impacts on a child / young person / vulnerable adult's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

Commercial exploitation: exploiting a child / young person / vulnerable adult in work or other activities for the benefit of others and to the detriment of the child / young person / vulnerable adult's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour and slave labour.

Grooming: a tactic where someone methodically builds a trusting relationship with a child, young person or vulnerable adult, their family, and community to manipulate, coerce, or force the child, young person or vulnerable adult to engage in sexual activities or other activities of an inappropriate nature.

Annex 6

Communications Policy & Code of Conduct for programme visits and other events involving children, young people and vulnerable adults

1. Introduction

Laureus uses the inspirational power of sport to tackle social problems and improve the lives of children and young people around the world.

Given the substantial focus that our programmes have on children and young people, this policy & code of conduct is in place to ensure that all the relevant people within Laureus manage and mitigate risks in relation to the safeguarding and protection of children, young people and vulnerable adults around the globe while delivering Laureus Sport for Good media and communications activity.

Laureus has a clear Safeguarding Policy which should be read alongside this document. This document focusses on the media and communications approach as part of, and in addition to, the Safeguarding Policy.

“Children” are persons under the age of 18 years old. “Young people” is a more empowered concept for children in the upper end of the age bracket who have more autonomy to take their own life decisions. This annex also covers “Vulnerable Adults” as defined in the Safeguarding policy, and in the programme release section it includes a narrower focus on “Adults under Care” who may not be able to provide their own legal consent.

2. Code of Conduct

When visiting a Laureus programme or event involving children, young people and/or vulnerable adults, you must:

- prior to the visit, have committed to the Safeguarding Policy by signing Annex 1 of the Policy or in such other manner acceptable to Laureus.
- also have committed to a Laureus partners safeguarding policy where they have requested it.
- always treat children, young people and vulnerable adults with respect regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status.
- always respect a child’s healing process and not explore individual stories if there is an indication, spoken or not, that the child carries deep traumatic experiences or simply does not wish to share.
- use language or behaviour towards children, young people and vulnerable adults that is at all times appropriate and in no way harassing, abusive, sexually provocative or demeaning.
- wherever possible, ensure that more than one adult is present when working in the proximity of children, young people and vulnerable adults.

- ensure physical contact is at all times appropriate within the cultural context and not an invasion of the privacy of the children, young people and vulnerable adults.
- use positive, non-violent methods to manage the behaviour of a child, young person and/or vulnerable adult; and raise any concerns of inappropriate behaviour immediately.
- immediately contact the safeguarding lead for the programme visit or event and/or contact Laureus' dedicated email safeguarding@laureus.com in the event you become aware of any actual or alleged safeguarding incident.

During a visit to a Laureus programme, you must not:

- spend time alone with a child, young person and vulnerable adult away from others.
- do things of a personal nature for a child, young person and vulnerable adult that they could do for themselves.
- demonstrate or give preferential treatment to a particular child, young person or vulnerable adult to the exclusion of others (for example, promising gifts or enticements).
- give or receive contact information of any kind with a child, young person and vulnerable adult e.g. email, phone number etc.
- act in ways intended to shame, humiliate, belittle, or degrade a child, young person and vulnerable adult, or otherwise perpetrate any form of abuse.

After a visit to a Laureus programme, you must not:

- contact or visit the location again without prior consent from Laureus Sport for Good or the organisation that leads the programme.

3. Use of media

3.1. Prior to event

- If photographic or video content is going to be captured during a programme visit or event, all children, young people and adults under care attending must be informed beforehand that their consent, and the consent of their parents/guardians, to being featured in such content is required and given the opportunity to opt out of participating. The person responsible at Laureus for the programme visit or event must ensure that this occurs.
- Partner organisations will need to sign a release stating that children, young people and/or adults under care present at the programme visit or event, as well as their parents/guardians have consented to being featured in photographic or video content. The person responsible at Laureus for the programme visit or event must ensure that this occurs.

3.2. During the event

- Only cameras or other recording devices belonging to Laureus or Laureus staff members or contractors acting on behalf of Laureus should be used and no one at a programme visit or event should be permitted to use any personal equipment to take photos and/or recordings of children, young people and adults under care.

3.3. After the event

- No content of children, young people and adults under care will be used unless Laureus is confident that informed consent has been provided. This shall be done through formal agreements including grant agreements and a separate programme release form in the attached form as well as by those responsible for the programme visit or event.
- Images of children, young people and adults under care will not be accompanied by personal identification information such as name and place of abode, where this could make the children, young people and adults under care easily identifiable and traceable.
- All images of children, young people and adults under care will be stored securely to ensure compliance with Laureus' Safeguarding Policy and with data protection law.
- This means that all hard copies will be kept in a locked drawer and electronic images kept in a protected folder with restricted access (it being clear who does and does not have access).
- Images of children, young people and adults under care will never be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

4. Guidelines on types of content captured

- The image should preserve the dignity of the children, young people and vulnerable adults, be respectful and be a truthful reflection of the immediate and wider context.
- Images should be used to celebrate the achievements of children, young people and vulnerable adults, Laureus Sport for Good and our partners, and you should not record photos/videos and messages that potentially stereotype, sensationalise or discriminate against people, situations or places.
- Images of Academy Members, Ambassadors and other guests should be shot in a way that places them on an equal footing to the children, young people and vulnerable adults involved in the programme or event. As a general rule, remember that the "stars" are the children, young people and vulnerable adults and other programme participants, not the Academy Members and Ambassadors.
- Images refers to all images in whatever format they are taken including photos and videos.

If you have any doubt about compliance with the above code of conduct or usage principles, you should consult any of the Laureus Sport for Good Chief Executive, Laureus Sport for Good Director of Programmes and Grants or Laureus Director of Development.

It is the responsibility of Laureus staff in attendance at the visit to ensure all guests agree to this code of conduct and usage principles and that they behave appropriately at all times.

Violation of the code of conduct and usage principles may result in disciplinary action.

PROGRAMME RELEASE FORM

Information for parents/guardians

Laureus aims to provide a safe and enjoyable experience for every child, young person and adult under care. To help us do this, please note the following:

- We recognise the need to ensure the welfare and safety of all children, young people and adults under care.
- We have a written policy statement which sets out how photographs and videos of children and other people involved in our activities should be taken and shared. A copy of this is available from the Laureus programme staff.

We will take all steps to ensure images of children and any other people are used solely for the purposes they are intended.

Child/Young Person/Adult under Care: please read the following consent form and discuss it with your parents/guardians, then fill in the form if you are happy to do so.

Parents/Guardians: please read and discuss this consent form with your child or young person/adult who cannot provide own legal consent (e.g. if they are under 18 years old or under care), and then, if you are happy to do so, fill it in, ask the child/young person/adult under care to fill it in and then return it to the Laureus group leader.

Consent information:
<i>To be completed by child/young person/featured adult:</i> • On the basis use is always respectful and relevant, and that images will be securely stored, I give permission for my photograph or video images to be used by Laureus to illustrate its work: ○ on displays ○ in publications ○ online and across social media ○ in Laureus TV and video content • I give permission for my photograph or video images to be used within publications of Laureus partners as well as on their website and social media pages including those belonging to Laureus’ commercial and media partners • I give permission for my story to be used with and in addition to the above uses.

I understand Laureus will never use personal details (e.g. full name, address) when communicating its work	
Signature of child/featured adult:	Print name:
Date:	

<i>To be completed by parent/guardian IF the young person is under 18 years of age or under care:</i>	
- On the basis use is always respectful and relevant, and that images will be securely stored, I give permission for my child's/adult under my care's photograph or video images to be used by Laureus to illustrate its work: - on displays - in publications - online and across social media - in Laureus TV and video content - I give permission for my child's/adult under my care's photograph to be used within publications of Laureus partners as well as on their website and social media pages including those belonging to Laureus' commercial and media partners - I give permission for my child's/adult under my care's story to be used with and in addition to the above uses. - I understand Laureus will never use personal details (e.g. full name, address) when communicating its work	
Signature of parent/guardian:	Print name of parent/guardian:
	[Relationship to young person]:
Date:	

Annex 7

Keeping Children, Young People and Vulnerable Adults safe online

1. Introduction

The pandemic left a lasting legacy in the way many sport for development organisations operate. At the onset of the pandemic in 2019-20, when real-life interactions came to a virtual halt, many of our partners took their programme delivery online, and while the end of the pandemic meant that activities could be carried out in real-life again, this experience deeply impacted the ways organisations, programmes and delivery staff interact with their programme participants. We have increasingly seen hybrid models being used as well as increased contact and communication through social media. And we notice an increase in the risks participants are exposed to when not having access to the usual safe and inclusive spaces and programme activities that our sector traditionally has been aspiring to provide.

In this context, Laureus Sport for Good take pride in playing a small role in supporting programmes to find ways to work with children, young people and vulnerable adults in spite of the difficult circumstances or just in the context of changing ways of delivering programme activities and inter-actions, including online engagement, such as video conferencing, or via social media platforms, or engagement through telephones.

In this changing environment, adults like sports coaches and educators and other programme may be engaging with children in an online environment. With this communication we believe that everyone, including ourselves, could benefit from some additional advice on how to do this safely.

In order to support everyone to do this well, Laureus Sport for Good have consulted with UNICEF UK, who developed a set of guidance to help children, young people and vulnerable adults along with their respective parents / guardians / carers and sports professionals to think about the risks this situation presents and plan online activities safely. In the following, we would like to put this into a context of general safeguarding of children, young people and vulnerable adults.

2. Before going online

Please remember, the minimum age for using social media platforms is 13 years old or above, depending on the platform. Check it before you start using it, and make sure you don't ask children under the required age to use them.

It is worth remembering that the online environment can be a really positive space that connects and educates children and in the current situation will, for some, be a social lifeline. However, we know it is also a space where children, young people and vulnerable adults can be at risk of harm and therefore, we need to be vigilant. UNICEF, who developed the guidance later in the document, has vast experience of managing emergency situations around the world, and this experience has taught them that some people will use crisis situations to exploit children that may be vulnerable due to the circumstances they are in; therefore, both UNICEF and Laureus Sport for Good want to make sure that everyone has access to the right information so that we can all protect children's, young person or vulnerable adult right to be safe from harm and exploitation.

3. The principles are the same

Just because we change the venue of engagement from the physical space to a virtual space does not mean that the fundamental principles of safeguarding change. For Laureus Sport for Good this has the interests of the child, young person and vulnerable adult at the heart of our policy and means:

- All children, young person and vulnerable adults have the right to participate, enjoy and develop through sport and otherwise, in a safe and inclusive environment, free from all forms of abuse, violence, deliberate neglect and exploitation.
- All individuals have a responsibility to foster the care and protection of the children, young people and vulnerable adults they (impact on) and act at all times in the best interests of the child.
- Some children, young people and vulnerable adults are more vulnerable than others to abuse.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, and beliefs, religious or political affiliation.
- There is not a single one of these fundamental principles that change just because the nature of the venue change. You can download our Safeguarding Policy by going to <http://www.laureus.com/safeguarding>.

By complying with the fundamental principles of safeguarding and the appropriate codes of conduct, independently of the nature of the engagement, physical or virtual, online or by phone or other means, we all help keeping children, young people and vulnerable adults safe. But remember also, it will help reduce the risk of exposure of your staff, programme and organisation as well as the external partners you collaborate with.

The code of conduct will continue to include do's and don'ts such as:

- Always treat children, young people and vulnerable adults with respect regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status; independently of your medium of engagement.
- Use language and behaviour towards children, young people or vulnerable adults that is at all times appropriate and in no way harassing, abusive, sexually provocative or demeaning; independently of your medium of engagement.
- Wherever possible, ensure that more than one adult is present when working in the proximity of children, Young People and vulnerable adults; Online as well as Offline.
- Ensure language and contact, physical and otherwise, is at all times appropriate and not an invasion of the child, young person and vulnerable adults privacy.
- Use positive, non-violent methods to manage a child, young person and vulnerable adults online and offline behaviour; and raise any concerns of inappropriate behaviour immediately.
- Only use the approved online platform when communicating, in particular with U18. Do not spend time alone with a child, young person and vulnerable adults away from others; whether online or offline.
- Do not do or suggest doing things of a personal nature for a child, young person and vulnerable adult that they could do for themselves.

- Do not demonstrate or give preferential treatment to a particular child, young person and vulnerable adult to the exclusion of others (for example, promising gifts or enticements); some kids are more adept at online engagement than others, but you need to find the balance.
- Reinforce professional boundaries with young people who begin personal communication. Do not give or receive contact information of any kind with a child, young person and vulnerable adult e.g. email, phone number, social media handles, etc.
- Do not socialise with a student online in a private or personal context; neither connect, follow, add or communicate with children under 18 on social media, their personal phone or email address.
- Do not post any personal information, image or video of children under 18 on your own social media, and always beware of data protection regulations in your country.
- Be mindful of the collection, storage and disclosure of children, young people and vulnerable adults' personal information and comply with the online platform's Privacy Policy.
- Do not take or publish screenshots in which appear children, young people or adults under care.
- Do not expose children or young people or vulnerable adults to inappropriate material online.
- Do not act in ways intended to shame, humiliate, belittle or degrade a child, young person and vulnerable adults , or otherwise perpetrate any form of abuse, Online or Offline.
- Do not engage in any behaviour that may constitute grooming.

This list is not exhaustive. Please consult a Laureus Sport for Good employee if you are in doubt. Note that violation of several of the dos and don'ts would constitute crimes and should immediately be reported to the police

4. Specific guidance on the active use of online platforms

It is important for organisations and groups to put safeguarding measures in place if they are communicating with children online. A learning platform is an online community.

Online communities can give an organisation wider reach and enable it to connect with more children and young people. Communities can be hosted on online forums, websites or social media. Different platforms and apps enable different benefits, such as instant messaging, personal profiles and facilities for hosting and sharing online events. But there are also risks.

You may set up a social media page for your group without the intention of establishing a community. However, once people start interacting with your page, it becomes an online community, and you have a responsibility to take steps to keep everyone who uses it safe.

Make sure the children, young people, staff and volunteers in your online community know who to talk to if they see or hear anything upsetting or inappropriate.

Invite parents and guardians to join the online community and ensure never to have 1:1 online sessions with individual children, young people or vulnerable adults.

And remember, if you wish to record online sessions, you should only do this with permission of the parents and guardians of not only the participants but also their parents and/or guardians. And you should not store the recordings in any way that can be publicly accessed. Ideally, you should not record sessions with children, young people or adults under care.

As well as following safeguarding and child protection policies and procedures, there are specific safeguarding measures that need to consider when an online community.

Key principles to consider:

- Decide what content in the platform is acceptable for U18 and how you will make this clear to users. Tell users what to expect when they sign up and give frequent reminders of your content rules.
- Consider implementing safety technology tools such as age assurance technologies to ensure that children are not able to access content aimed at adult audiences.
- Who can join the community? Be clear on minimum age limits and set an age range and consider how you will check that community members are the right age. Take proactive steps to understand whether children are accessing the platform and to prevent those who are too young from accessing it. You could use age assurance technology to establish the age of your users. This can help you take steps to provide younger users with greater protections and prevent younger users from accessing your service. Where you can identify children and other users who may be vulnerable, you can put specific protections in place to manage their safety. You could request that when U18s and adults under care register, their parents/carers must register together with them and prove their age.

Practical safety measures to consider:

- Offer easy to use reporting mechanisms for children to report inappropriate content. You should also inform users of the action taken as a result of the report and the reasons for this action.
- Consider special default protections for accounts that are opened by under 18s. See Online safety guidance if you own or manage an online platform for further advice.
- Consider using AI based reporting to parents and carers about their children under 18's online behaviour.
- Make it abundantly clear how to report incidents. On the home page, explain clearly how to report incidents. This will support children, young people and vulnerable adults and help deter perpetrators.
- What information can be shared? Setting up your community as an online site or forum may allow you to have more control over the level of personal information that is visible to others. Encourage parents, carers and children to turn on privacy and security settings on all online accounts.
- How will the community be moderated? To make sure children are not exposed to harmful or inappropriate content you will need to moderate your community. Plan and regularly update how you will manage inappropriate content posted on your site. Children often find ways around

your moderation processes, so you need to keep them under review. This means checking and reviewing what people are posting to assess whether children may be at risk. Make sure the staff or volunteers who run and moderate your community are safe to do so. Anyone who works with children, online or offline, should be subject to safer recruitment practices. To moderate effectively, you should:

- publish clear guidance on what is and is not allowed to be posted
- establish when posts will be moderated, for instance whether they are reviewed before or after they go live
- decide when children will be able to post and submit content
- familiarise yourself with the language children use so that you understand whether the language may be inappropriate or harmful.

5. Reporting incidents

If you have any questions or concerns about Safeguarding in Laureus Sport for Good or a programme or activity supported by us, please contact: safeguarding@laureus.com or contact your contact person in Laureus directly.

6. Guidance

6.1. Messages for Programmes and their staff, volunteers , including coaches and educators

You may have found yourself in the unusual situation where activities you would have delivered face to face now have to be delivered online. This can present some safeguarding challenges that you may not have considered before, or that it may be useful to be reminded of. In practice we need to apply the good standards of how we would engage with children normally in a face-to-face content, to the online environment. Below are a few things it might be helpful to consider:

- Plan any online contact with safeguarding in mind – Just as you would plan any face to face activities with children, young people and vulnerable adults and think about any risks and mitigations, you should plan online activities in the same way. Be aware of where you are engaging with children, young people and vulnerable adults, for example, are you or they in the bedroom while they are online? What are children, young people and vulnerable adults wearing and is it appropriate? Complete a risk assessment that maps out what the potential risks are and how these will be mitigated and consider some of the issues outlined below.
- Be accountable – One of the issues when engaging with children, young people and vulnerable adults online is that our actions and words are not always as visible to others as they would usually be. You should not have one-to-one online contact with children, young people and vulnerable adults and if possible, always have another adult involved in the group discussion. You should try to engage with groups of children, young people and vulnerable adults together so that there is a level of accountability for your actions and where this is absolutely not possible, (for example a coach providing a one-to-one online training session), encourage the young person to engage with you in an area of their home that is visible to others (e.g. not in their bedroom) and ask the child, young person and vulnerable adults parent, guardian or carer to check in with you and the child, young person and vulnerable adult at the end of the session to talk through what you covered. It's also good practice for you to copy parents / guardians / carers into online communications with children.

- Keep professional boundaries – everything can feel very familiar and informal when engaging with people online, but it is important to remain professional and have clear boundaries at all times. This doesn't mean that you can't be warm and friendly, but just because you're engaging with children, young people and vulnerable adults from a personal space it doesn't mean you should share personal information with them. In the same way you would in face to face contact, keep your engagement with children young people and vulnerable adults focused on the activities. Never approach children, young people and vulnerable adults through your personal online channels and social media or attempt to make private contact with them and politely decline any invitations you receive from children or young people to link up privately online. All communication should be directly with their parents or legal guardians.
- Always be conscious about your dress-code and behaviour, also when connecting online.
- Separate out and close off accounts - be aware of the possible links between your professional and personal social media accounts. It is good practice to use a different account completely for engaging with children, young people and vulnerable adults so that you do not have to share personal social media contact details and there can be no confusion about the nature of the contact with children, young people and vulnerable adults. It is also good practice to use closed groups that only include the children, young people and other adults leaders that are involved, so that they cannot be open to external individuals that could then access the children and young people separately.
- Be ready to report – you may become aware of a risk of harm to the child/children, young person/young people and vulnerable adults you are engaging with. This may be because they will tell you about something they are experiencing or worried about or you may observe something about their home situation that you wouldn't have previously had sight of. Be aware of how to report any concerns, whether the child, young person and vulnerable adult are in need of immediate medical and/or police assistance or where you can contact support agencies after the online session has finished.
- Usual rules apply – The online environment can be negative and toxic for children, young people and vulnerable adults and you have the opportunity to role model positive behaviour and challenge anything that does not meet the high standards you would normally expect offline.
- Before you go online you should also consider preparing the children, young people and vulnerable adults as well as their parents / guardians / carers to this different type of engagement. This is not just about you getting consent to working with the children, young people and vulnerable adults online, but also to help them protect themselves from any potential risk they could be exposed to.

The following two sections could be shared with children, young people and vulnerable adults and with their parents / guardians / carers:

6.2. Messages for children and young people

Like many children, young people and vulnerable adults all over the world, you have probably found yourself in a completely new situation. Rather than your usual routine of going to school and after school activities you're most likely at home with the online world as your only way of connecting with friends. The online world can be really positive and provide you with brilliant ways to keep connected; however, we know it can also be a place where children can experience bullying and other types harm and don't always feel safe.

So, with the help from UNICEF UK we want to share some ideas with you for keeping safe during this time.

- Normal safety rules apply – just because the world is managing an unusual situation don't let your guard down! Keep the same rules of security and safety online that you normally would. Don't share contact details with people you don't know and trust and keep private things private. Only engage with adults that are in a professional relationship to you (e.g. sports coaches) as part of the professional sessions they are delivering – don't invite them or accept them as private 'friends' or contacts on online accounts. And always dress and behave as if this was a face to face meeting.
- Be aware of the law and keep safe – In this situation we could feel that it doesn't matter if we do things we wouldn't usually do because we aren't going to see each other for a while. It's still illegal and dangerous to share sexual or inappropriate images of yourself with anyone else, including people we think of as our boy or girlfriend.
- Be kind – the online environment can be a really hurtful place and particularly while we are all living in challenging circumstances that might make us feel more vulnerable than usual, we need to be kind to each other both on and offline. Don't keep in contact with people that are being unkind online and tell a trusted adult or if you have access, call your national helpline, if you need to talk.
- Avoid negative websites and information that doesn't help you feel positive and safe – sometimes it's helpful to hear how other people are managing their difficult feelings but sometimes this sort of content online actually makes people feel worse about themselves. Tell someone you trust, or if you have access, call your national helpline if you're feeling yourself being drawn to websites that are unhelpful or contain information about harming yourself in any way.
- Tell someone if you're concerned or worried about anything – organisations like national helplines are still out there working as normal to support you if you're worried about anything.

6.3. Messages for parents / guardians / carers

It can be easy to lose track of what our children, young people and vulnerable adults are doing online, especially at a time like this when all of us are trying to manage work and school from home. It is really important that we know, as far as possible, what our children, young people and vulnerable adults are doing online and who they are connecting with, in order to ensure they are not accessing websites and other information that could be harmful.

- Be aware – A few specific things to consider are:
 - People that would seek children, young people and vulnerable adults out online are likely to look for ways of exploiting the current situation and may increase their online activities, so now is a good time to remind our children, young people and vulnerable adults about what to be aware of and the need to keep privacy settings firm.
 - Children, young people and vulnerable adults accessing online gambling sites
 - Children, young people and vulnerable adults being exposed to inappropriate violent or sexual content.

- Children, young people and vulnerable adults experiencing harm from other children, young people and vulnerable adults, or causing harm towards other children, young people and vulnerable adults.
- Set boundaries – Although children, young people and vulnerable adults may need to be online more for schoolwork and social contact, it's a good idea to still set some boundaries so that this is balanced with offline activities too. Also think about age restrictions - children must be at least 13 years old or older to engage online with social media sites, so that they are mature enough to manage what they use the sites for.
- Check in – make yourself known to adults you wouldn't usually expect to have online contact with your child, young person, young people and vulnerable adults, to check that they are contacting them for a legitimate purpose, for example, if a sports coach has started online coaching sessions. It's also good practice for adults to copy parents / guardians / carers into online communications with younger children (under 13 years old) and also to have another adult present in online groups for accountability, so feel free to ask the lead adult what they have put in place to make sure children are safe in the online groups they are running. It is not good practice for online contact to take place between one child and one adult in a private space where no-one else can hear the discussion so challenge this practice if you see it happening.
- Report any concerns – If you are worried about the interactions between any adults or children, young person, young people and vulnerable adults online, especially if you think they may be at risk from someone seeking to sexually exploit them online, if you have access, report this to your national helpline or to relevant local organisations that provide advice and support on these issues.

6.4. Additional online resources and sources of advice

- Girl Effect (good practice safeguarding guidelines for the digital era)
- Safeguarding Children and Young People Online – A guide for social workers
- <https://www.saferinternet.org.uk/blog/working-remotely-advice-professionals-parents-posh-rhc>
- Thinkyouknow (advice from the National Crime Agency to stay safe online)
- Internet matters (support for parents, guardians and/or carers to keep their children safe online)
- Parent info (support for parents, guardians, and/or carers to keep their children safe online)
- Net-aware (support for parents, guardians and/or careers from the NSPCC)

Annex 8

Managing email address designated for incident reporting

Laureus Sport for Good have created an email address for the explicit purpose of reporting safeguarding incidents directly to the safeguarding team at Laureus Sport for Good, comprised of the Global Safeguarding Officer, the two Safeguarding Coordinators, Chief Executive and the Trustee lead on Safeguarding.

The email address is: safeguarding@laureus.com.

Only the Global Safeguarding Officer and the Safeguarding Coordinators have access to the email address.

The email address must be reviewed on a daily basis.

The email review will be managed on a rotation basis, where each of the safeguarding staff will be responsible for reviewing every third week.

If the responsibility to review coincides with annual leave or other reason for not being able to access the email address, the person affected will communicate to the Global Safeguarding Officer who will assume the reviewing or allocate to the other Safeguarding Coordinator.

At no given point may the incident reporting email address be left unattended for more than 48 hours

Annex 9

Role and Responsibilities of the Global Safeguarding Officer and Safeguarding Coordinator(s)

Role and Responsibilities of the Global Safeguarding Officer and Safeguarding Coordinator(s)

1. The purpose of the Role is to:

- take the lead in ensuring that appropriate arrangements for keeping children, young people and vulnerable adults safe are in place at Laureus Sport for Good.
- promote the safety and welfare of children, young people and vulnerable adults in programmes and activities supported, endorsed and hosted by or on behalf of Laureus Sport for Good at all times.

2. Duties and Responsibilities

- 2.1. Take a lead role in developing and reviewing Laureus Sport for Good's safeguarding policy and procedures.
- 2.2. Take a lead role in implementing Laureus Sport for Good's safeguarding policy and procedures: ensuring all safeguarding issues concerning children, young people and vulnerable adults who take part in programmes and activities supported, endorsed or hosted by or on behalf of Laureus Sport for Good are responded to appropriately.
- 2.3. Make sure that everyone working or volunteering with or on behalf of Laureus Sport for Good, including the employees, trustees, associates, volunteers, contractors and grantees, understands the safeguarding policy and procedures and knows what to do if they have concerns about a child's welfare.
- 2.4. Make sure children, young people and vulnerable adults who are involved in Laureus Sport for Good related activities and their parents, guardians and / or carers know who they can talk to if they have a welfare concern and understand what action the organisation will take in response.
- 2.5. Receive and record information from anyone who has concerns about a child, young person or vulnerable adult who takes part in programmes and activities supported, endorsed or hosted by or on behalf of Laureus Sport for Good.
- 2.6. Take the lead on responding to information that may constitute a safeguarding concern, including a concern that an adult involved with Laureus Sport for Good may present a risk to children or young people.

This includes:

- 2.6.1. assessing and clarifying the information.
- 2.6.2. making referrals to statutory organisations as appropriate.
- 2.6.3. consulting with and informing the relevant members of the organisation's management and safeguarding team.

- 2.6.4. following the organisation's safeguarding policy and procedures.
- 2.7. Liaise with, pass on information to and receive information from statutory child protection agencies such as:
 - 2.7.1. the local authority child protection services.
 - 2.7.2. the police.
- This includes making formal referrals to agencies when necessary.
- 2.8. Store and retain child protection records according to legal requirements and the organisation's safeguarding and child protection policy and procedures.
- 2.9. Work closely with the safeguarding team, including the Global Safeguarding Coordinator, Chief Executive and Trustee Safeguarding Lead, to ensure they are kept up to date with safeguarding issues and are fully informed of any concerns about organisational safeguarding practice.
- 2.10. Global Safeguarding Officer reports regularly to the Board of Trustees on issues relating to safeguarding to ensure that safeguarding is seen as an ongoing priority issue and that safeguarding requirements are being followed at all levels of the organisation.
- 2.11. Be familiar with the Global Safeguards for children, young people and vulnerable adults in sport.
- 2.12. Be familiar with issues relating to protection and abuse of children, young people, and vulnerable adults, and keep up to date with new developments in this area.
- 2.13. Attend regular training in issues relevant to safeguarding and share knowledge from that training with everyone who works or volunteers with or for children, young people and vulnerable adults at Laureus Sport for Good.
- 2.14. Network with other agencies committed to strengthening safeguarding of children, young people and vulnerable adults in the Sport for Development sector.
- 2.15. Attend team meetings, supervision sessions and management meetings as arranged.
- 2.16. Work flexibly as may be required and carry out any other reasonable duties.

Appointment to this role is subject to satisfactory vetting and barring checks.

The Global Safeguarding Officer performs the lead function and reports to the Board of Trustees on all safeguarding issues.

The Safeguarding Coordinator(s) report to the Global Safeguarding Officer.

Annex 10

Safeguarding Principles at Laureus Sport for Good

Safeguarding Principles at Laureus Sport for Good

- All children, young people and vulnerable adults have the right to participate, enjoy and develop through sport and otherwise, in a safe and inclusive environment, free from all forms of abuse, violence, deliberate neglect and exploitation.
- All individuals...have a responsibility to foster the care and protection of the children, young people and vulnerable adults they (impact on) and act at all times in the best interests of the child, young person and/or vulnerable adult.
- Some children, young people and adults are more vulnerable than others to abuse,
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on age, gender, race, ethnicity, ability, sexual orientation, and beliefs, religious or political affiliation.
- You can download our Safeguarding Policy by going to <http://www.laureus.com/safeguarding>. If you have any questions or concerns about Safeguarding in Laureus Sport for Good or a programme or activity supported by us, please contact: safeguarding@laureus.com or contact Laureus Staff directly.

Code of Conduct

When engaging with any programme or activity hosted or supported by Laureus Sport for Good, you will by default have committed to complying with our safeguarding policy's Code of Conduct, including:

- Commit to a Laureus partners' safeguarding policy where they have requested it.
- Always treat children, young people and vulnerable adults with respect regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status.
- Use language and behaviour towards children, young people and vulnerable adults that is at all times appropriate and in no way harassing, abusive, sexually provocative or demeaning.
- Wherever possible, ensure that more than one adult is present when working in the proximity of children, young people and vulnerable adults.
- Ensure physical contact is at all times appropriate and not an invasion of the child/young person/vulnerable adult's privacy.
- Use positive, non-violent methods to manage a child/young person/vulnerable adult's behaviour; and raise any concerns of inappropriate behaviour immediately.
- Immediately contact the safeguarding lead for the programme visit or event and/or contact Laureus' dedicated email safeguarding@laureus.com in the event you become aware of any actual or alleged safeguarding incident.
- Do not spend time alone with a child, young person, vulnerable adult away from others.
- Do not do things of a personal nature for a child, young person or vulnerable adult that they could do for themselves.
- Do not demonstrate or give preferential treatment to a particular child, young person or vulnerable adult to the exclusion of others (for example, promising gifts or enticements).
- Do not give or receive contact information of any kind with a child, young person or vulnerable adult, e.g. email, phone number etc.
- Do not act in ways intended to shame, humiliate, belittle or degrade children, young people and/or vulnerable adults, or otherwise perpetrate any form of abuse.
- This list is not exhaustive. Please consult a Laureus staff member if you are in doubt.