

**INVICTUS GAMES FOUNDATION
SAFEGUARDING POLICY**

Introduction

The Invictus Games Foundation (“the Charity”) has designed these safeguarding procedures to ensure the welfare and protection of vulnerable adults who have an association with or dealings with the Charity, predominately the Wounded, Injured and Sick military community. The procedures recognise that vulnerable adult protection can be a very difficult subject to deal with to the extent that it is sometimes easier to close your eyes to what is happening or believe that it is somebody else’s problem to deal with.

The Charity is committed to the belief that vulnerable adults ARE everybody’s responsibility and therefore the aim here is to provide guidelines that will enable all management, trustees, employees, consultants, contractors, workers, casual and agency staff and volunteers of the Charity (“Staff”) to act appropriately to any concerns that arise in respect of any vulnerable adults who are associated with or exposed to the Charity, working in conjunction with the Welfare Officer as detailed further below.

For the purpose of this Safeguarding Policy, vulnerable adults are defined as:

- People aged 18 or over;
- Who are receiving or may need community care services because of learning, physical or mental disability, age, or illness; and
- Who are or may be unable to take care of himself, herself or themselves, or unable to protect himself, herself or themselves against significant harm, exploitation, abuse or neglect.

For the purpose of this Safeguarding Policy, safeguarding adults means protecting a person’s right to live in safety, free from abuse and neglect.

Safeguarding Statement

The Charity believes that it is always unacceptable for a vulnerable adult to experience abuse of any kind and acknowledges its duty of care to safeguard and promote the welfare of vulnerable adults within the Wounded, Injured and Sick community. The Charity is committed to ensuring that its safeguarding practice reflects statutory responsibilities.

The Charity believes that:

- The welfare and interests of vulnerable adults are paramount in all circumstances.
- All vulnerable adults whatever their age, culture, disability, sex/gender, language, racial origin, religious beliefs, sexual orientation and/or socio-economic background have the right to equal protection from all types of harm or abuse.
- Some people, including vulnerable adults, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare and reduce the risk of abuse or neglect.

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- All suspicions and allegations of abuse should be taken seriously and responded to swiftly and appropriately.
- All Staff should be clear on how to respond appropriately to all suspicions and allegations of abuse.

The purpose of the Safeguarding Policy is:

- To provide protection for vulnerable adults who are associated with or exposed to the Charity.
- To provide all Staff with guidance on procedures they should adopt in the event that they suspect a vulnerable adult may be experiencing, or be at risk of, harm or abuse.

As part of our Safeguarding Policy the Charity will:

- Promote and prioritise the safety and wellbeing of vulnerable adults by protecting them from poor practice, abuse, neglect or bullying whilst undertaking activities of the Charity.
- Prioritise fair and transparent recruitment practices to prevent the employment/deployment of unsuitable individuals.
- Ensure robust safeguarding arrangements and procedures are in place and that everyone at the Charity understands their roles and responsibilities in respect of safeguarding and are provided with training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to the Wounded, Injured and Sick community.
- Ensure the designated safeguarding lead (the Welfare Officer) and trustee lead undertake Level 1 & 2 safeguarding training at least every two years.
- Ensure all other Staff and trustees excluding volunteers undertake Safeguarding Awareness course every two years. Records of all safeguarding training will be logged in the Training Register and reviewed accordingly.
- All Staff should be 'DBS Basic' checked. To the extent that any Staff require DBS checks at a different level (i.e. standard or enhanced) this will be dealt with on a case by case basis. Grants and Operations Support Executive is the custodian of the DBS register.
- Ensure all concerns are taken seriously and that timely and appropriate action is taken in response to concerns raised, and where required, provide support to the individual/s that raised or disclosed the concern.
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored for 7 years.
- Work collaboratively and in partnership with all necessary external agencies.
- Ensure all Team Managers from the Participating Nations of the Invictus Games receive the Invictus Games Foundation Safeguarding Policy

Scope of the Policy and Commitment of the Charity:

The Safeguarding Policy and procedures will be widely promoted and are mandatory for all Staff. Failure to comply with the policy and procedures will be addressed without delay and may result in dismissal/exclusion from the Charity.

The Charity acknowledges its role in the selection of the host cities for the delivery of the Invictus Games, a sporting event that the Charity encourages its beneficiaries, some of whom are vulnerable

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adults, to participate in. The Charity also acknowledges its partnerships with other organisations for the delivery of the Charity's activities. Therefore the Charity commits to:

- Overseeing that appropriate safeguarding measures are being adopted by the responsible bodies and organisations responsible for carrying out the IGF activities, including the Invictus Games. The Charity will work with these organisations to ensure that vulnerable adults are afforded equivalent protections to those that are adopted by the Charity.
- Each body, organisation and/or host city is itself responsible for ensuring that such measures are appropriately implemented and observed and the Charity will itself seek to require each to report to the Charity any failures under such measures which the Charity may work with the relevant body, organisation and/or host city to resolve.
- Making all employers, employees, contractors, consultants, volunteers and parties (who are not Staff) with involvement in the activities of the Charity aware of their responsibility to help protect vulnerable adults across their activities and should take all reasonable steps to minimise the materialisation of these risks.

Role of the Welfare Officer

The Charity has **2** dedicated **Welfare Officers**, who are in charge of ensuring that the Safeguarding Policy and procedures are adhered to. This role will be undertaken by the Grants & Programmes Director, in the first instance, who can be contacted by emailing grants@invictusgamesfoundation.org. If the Grants & Programmes Director is unavailable, the Chief Operating Officer is to be contacted by emailing chief@invictusgamesfoundation.org.

The Welfare Officer is responsible for:

- Being the main point of contact for all vulnerable adults in the Wounded, Injured and Sick community to report concerns and disclosures, handling concerns calmly and sensitively in line with the Charity's reporting procedure and prioritising the wellbeing of vulnerable adults at all times.
- Ensuring that all Staff are aware of what they should do and who they should go to if they are concerned that a vulnerable adult may be subject to abuse or neglect.
- Contacting the Charity's Mental Health Consultant to discuss any issues that may arise whether that is through Charity's Staff or the "We Are Invictus" community.
- Receiving and recording information from Staff, vulnerable adults or carers who have concerns.
- Assessing the information properly and carefully, clarifying or obtaining more information about the matter as appropriate.
- Contacting the Local Authority adults' social care team and the police where appropriate.
- Recording any reported incidents in relation to vulnerable adults and ensure that such records are kept in a secure place.
- Ensuring specialist advice and training is made available to Staff.
- Managing safeguarding effectively; ensuring all procedures are communicated and adhered to and that relevant training is made available where required.
- Reviewing and updating the Safeguarding Policy in line with legislative and Charity developments.

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- Providing safeguarding advice and information to the Charity's Board of Trustees on a regular basis, as requested.
- Being the first contact for any concerns raised and effectively managing these in line with statutory requirements.
- Being the Charity's contact and liaison for all relevant external agencies.
- Where the Charity, via 'We Are Invictus' app. 'sign posts' to third-party providers/organisations services, the Welfare Officer will first ensure that the third-party organisation has appropriate safeguarding policies and procedures in place. Should no such policies and procedures be in place, then that organisation should not be used.
- Where there are concerns about the safety of an adult, the Welfare Officer will share information in a timely and effective manner between organisations including at the relevant level within nation, if appropriate if this reduces the risk of harm.
- All situations of abuse or alleged abuse must be discussed with the Welfare Officer. If a member of Staff feels unable to raise their concern with the Welfare Officer then concerns can be raised with the Safeguarding Trustee, Conny Wenting, who can be contacted on the following email address: Conny Wenting conny.wenting@invictusgamesfoundation.org. The alleged victim will be told that this will happen.

Role of the Safeguarding Trustee

- To review annually the Safeguarding Policy
- To review annually the Safeguarding Procedures and the efficiency with which they have been discharged
- To meet regularly with the Executive including the Grants & Programmes Director
- To maintain an oversight of and advise on key Safeguarding issues as they affect the IGF and Invictus community including the Participating Nations
- To report annually to the HR and Employment Committee
- To maintain his/her Safeguarding training and awareness of regulatory and legislative changes
- To identify Safeguarding-related Risks for the IGF and to ensure that the IGF Risk Register is updated accordingly

Preventing Abuse

The Charity is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within the Charity will be treated with respect.

The Charity is committed to safer recruitment policies and practices for all Staff. This may include DBS disclosures for all Staff, ensuring references are taken up and adequate training on safeguarding is provided for all Staff.

The Charity will work within the current legal framework and the Charity's disciplinary policy where appropriate for reporting and managing Staff that are accused of abuse.

Recognising the Signs and Symptoms of Abuse

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The Charity is committed to ensuring that all Staff undertake training to gain a basic awareness of signs and symptoms of abuse.

Abuse includes:

- **physical abuse:** including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint;
- **domestic abuse:** including psychological, physical, sexual, financial or emotional abuse, or so-called "honour" based violence;
- **sexual abuse:** including rape, indecent assault, inappropriate touching, sexual harassment, exploitation, exposure to pornographic material;
- **psychological or emotional abuse:** including belittling, name calling, threats of harm, intimidation, isolation;
- **financial or material abuse:** including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits (some signs can include, but are not limited to, a change in living conditions, selling possessions, unexplained lack of money, loss of financial documentation, sudden changes to bank accounts or authorisations);
- **neglect and acts of omission:** including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs;
- **self-neglect:** this covers a wide range of behaviour which shows someone is not caring for their own personal hygiene, health or surroundings;
- **discriminatory abuse:** including racist, sexist, that based on a person's disability, age, sexual orientation or religion and other forms of harassment, slurs or similar treatment;
- **institutional or organisational:** including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment, a charity's culture, which may allow poor behaviour and poor accountability and
- **modern slavery:** this covers slavery (domestic slavery), human trafficking, forced labour and forced marriage.
- **online abuse:** including cyber abuse, data breaches, including those under General Data Protection Regulations (GDPR)

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts. People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, Staff members, volunteers or other professional staff/individuals in a position of trust. They may also be relatives, friends, neighbours, strangers and people who see an opportunity to abuse, or people who use the same services as the person experiencing abuse.

The risk of abuse may be heightened in situations where there are records of someone being abused before, other members of their family have been abused, or there are family tensions and conflicts.

Responding To People Who Have Experienced Or Are Experiencing Abuse

The Charity recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of vulnerable adult abuse is never easy.

How to respond if you witness abuse or receive an allegation:

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Never investigate or take sole responsibility for a situation where a vulnerable adult makes a disclosure. The person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is a task for the relevant authorities following the referral to them by the Welfare Officer. Effective safeguarding is about working in partnership with people, places and organisations.

Contact the Welfare Officer immediately. Do not delay in taking action. It is the Welfare Officer's responsibility to liaise with the relevant authorities if applicable



If you cannot reach the Welfare Officer or the secondary Welfare Officer, and someone is in immediate danger call the Police or an Ambulance if applicable



Reassure the person concerned and listen carefully to what they are saying. Let them know that the information will be treated seriously. Preserve evidence.



Record what you have been told/witnessed as soon as possible. Where available, use the IGF Safeguarding incident form and use their words where possible to ensure non-bias.



Remain calm and do not show shock or disbelief. Do not start to investigate or ask detailed or probing questions. Do not promise to keep it a secret.



Tell them what you will do next and with whom the information will be shared, who is the person who needs to know and who should be able to help.



Sign and date the report and make sure that the disclosure is reported to the Welfare Officer or Safeguarding Trustee.

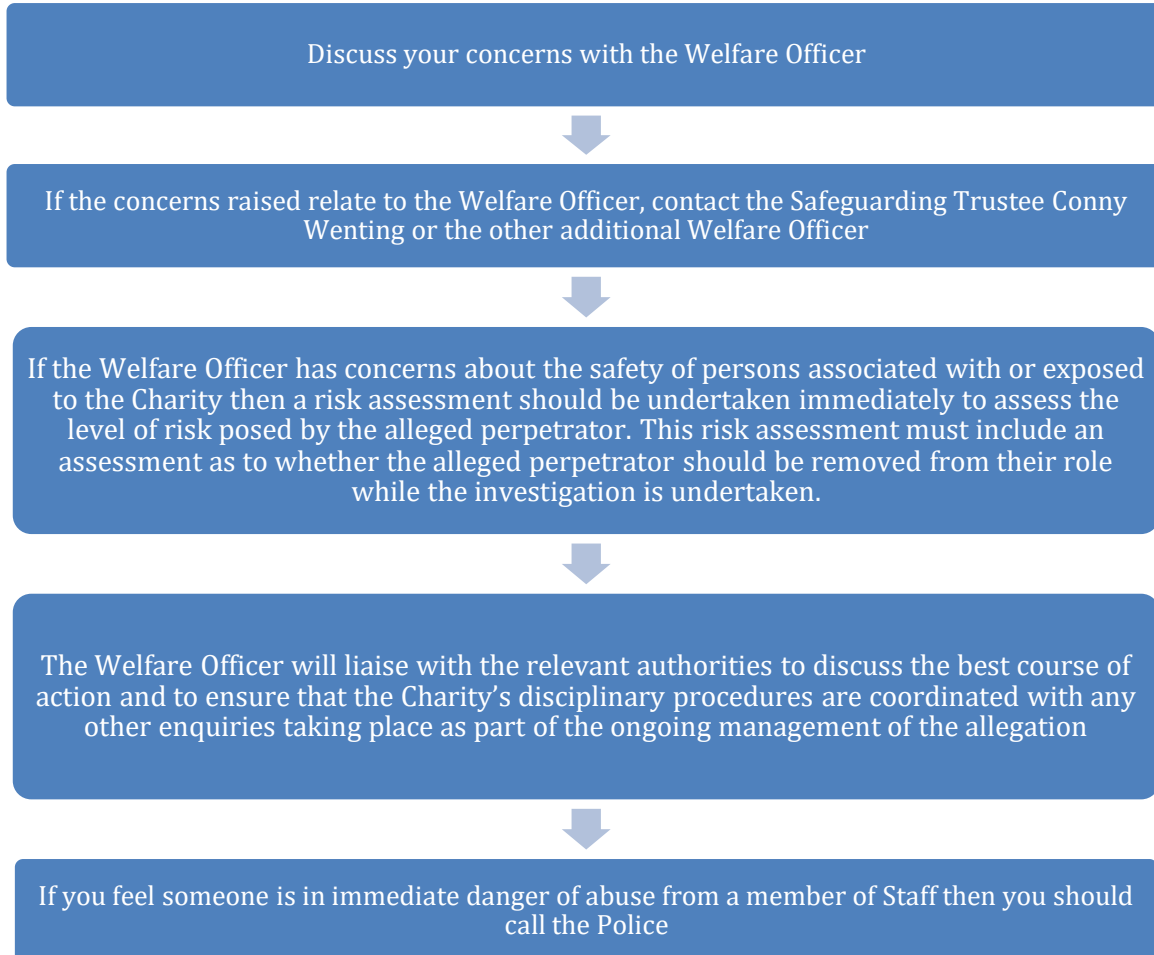
If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral should be made to the relevant local authority's adult social care team. In addition, information on safeguarding cases may be shared by the Welfare Officer with other relevant employees on a 'need to know' basis and only when it is in the vulnerable adult's best interests to do so.

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How to respond if you have concerns about a member of Staff



Recording and Managing Confidential Information

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, it is vitally important to record the details of an allegation or reported incident, regardless of whether or not the concerns are shared with an external agency.

Using the Safeguarding Incident Form and Register, an accurate note should be made of:

- Name, age, date of birth of victim and witness
- Home address and telephone number of victim and witness
- Whether the person making the report is expressing their own concerns or those of someone else.
- A description of any visible bruising/injuries.

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- The nature of alleged incident including dates, times and any special factors or relevant information.
- Parties who were allegedly involved.
- Details of witnesses to the incident/s.
- What was allegedly said or done and by whom.
- The dates and time of the disclosure by the adult at risk.
- Names of persons reporting and to whom reported.
- Any action taken by the Welfare Officer to investigate the matter.
- Any further action by the Charity e.g. suspension of the member of Staff.
- Where relevant, reasons why there is no referral to a statutory agency.

The record should be clear and factual as it may be needed by agencies investigating the incident and may, in the future, be used as evidence in court. Keeping such a record may also help protect the Charity.

The information that is recorded will be kept secure and will comply with data protection legislation and GDPR. Access to this information will be restricted to the Welfare Officer, Safeguarding Trustee and the Chair of the Charity. The Charity recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it and will not keep such information for any longer than is absolutely necessary. This is generally a period of up to six years to allow for consideration and resolution of any disputes.

Operating online:

Operating online carries specific safeguarding risks connected to protecting people from abuse and protecting sensitive information.

All staff are required to have two factor password protection on their laptops and undertake a basic Cyber Awareness module from the National Cyber Security Centre annually.

We Are Invictus is password protected for each user with WIS data encrypted both in transit and at rest. A dedicated Web Application Firewall (WAF) is provided to give protection against malicious attacks. Standard OWASP rules are implemented.

Further control measures for We Are Invictus are:

- Objectionable content has a 'flag content' mechanism whereby the Grants & Programmes Director, Invictus Community Liaison Executive, Invictus Endeavours Administrator and the We Are Invictus moderators review and if applicable remove the content within 24 hours of the flag. If appropriate the posting user can be banned from We Are Invictus. It should be noted that it is up to those named above to decide what is appropriate and if it fits within the App Store review guidelines.
- Sensitive documents uploaded via a secure link for We Are Invictus access are deleted automatically after approval.
- Four user types:

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1. Superuser - All admin privileges and data access at the application level. This does not pertain to any supplementary services (eg S3 storage for example)
2. Staff - Have access to the admin interface for managing all data
3. Moderator - As staff with permissions set to allow only access to: Posts, Opportunities, Image uploads, Flagged content and Comments
4. User - Can login to the app only and not the API

The Invictus Games Foundation also engages WIS through third party platforms: Zwift and Discord with our active esports offerings. Both companies terms of use, codes of conducts and flagging procedures can be found below:

https://support.zwift.com/en_us/house-rules-community-guidelines-HyFX7MK4P

https://support.zwift.com/en_us/reporting-another-zwifter-Bk7_B0FNB

<https://discord.com/guidelines>

https://support.discord.com/hc/en-us/requests/new?ticket_form_id=360000029731

This Safeguarding policy has been approved by the HR Committee on 28NOV23. All Invictus Games Foundation staff and the Board of Trustees are to read the Safeguarding policy on an annual basis. This will be updated in the Safeguarding annual check register.

The Grants & Programmes Director and Safeguarding Trustee will review this policy on an annual basis.

Date of original policy	November 2021
Policy review date	November 2024
Accountable person	Grants & Programmes Director
Policy Author	Grants & Programmes Director

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