

# SAFEGUARDING POLICY

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POLICY NO. 2.0

VERSION: 1.1      DATE OF LAST REVISION: 05.08.2025      OWNER: Group Safeguarding, Wellbeing & Character Program Lead

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| VERSION HISTORY: |             |               |                                                                             |
|------------------|-------------|---------------|-----------------------------------------------------------------------------|
| VERSION          | APPROVED BY | REVISION DATE | KEY CHANGE                                                                  |
| 1.0              | EDT         | 15.10.2024    |                                                                             |
| 1.1              | CP          | 05.08.2025    | Section 5: addition of online incident reporting tool & DSO contact details |
|                  |             |               |                                                                             |
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|                  |             |               |                                                                             |

# SUMMARY

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| MUST DO                                                                                                                                                                                                                                                                                                                      | NEVER DO                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>✓ Create a safe and inclusive environment where all are treated with respect and dignity.</li><li>✓ Take all safeguarding concerns seriously.</li><li>✓ Provide support and guidance to all our staff to help them understand, recognise and respond to safeguarding issues.</li></ul> | <ul style="list-style-type: none"><li>✗ Ignore or brush aside observed or raised safeguarding concerns.</li></ul> |

RtD is a group of professional football clubs and academies based in Denmark, Egypt, Ghana, and the USA which includes the professional teams, FC Nordsjælland (Denmark), FC Masar (Egypt) and San Diego FC (USA).

Safeguarding is a term used to denote measures to protect the health, well-being and human rights of individuals, which allow people, especially children, young people and vulnerable adults, to live free from abuse, harm and neglect.

Safeguarding is the responsibility of RtD to make sure our staff, operations, and programmes do no harm to children, vulnerable adults or vulnerable communities, or expose them to harassment, abuse or exploitation. We recognize our moral and statutory responsibilities to ensure that every individual, regardless of age, gender, ability, race, religion, or sexual orientation, can participate in our activities and programs safely.

Our commitments include:

**Prevention:** We strive to prevent harm by creating a safe and inclusive environment where everyone is treated with respect and dignity.

**Protection:** We have robust policies, procedures, and training in place to protect our players, especially our academy and student athletes, players, staff and others connected to our activities from all forms of harassment and abuse.

**Support:** We provide support and guidance to our student athletes, staff, and partners to help them recognize and respond appropriately to safeguarding concerns.

**Accountability:** We take all safeguarding concerns seriously and ensure they are promptly and thoroughly investigated, with appropriate actions taken to address any issues identified.

**Partnership:** We work in partnership with relevant agencies, communities, and stakeholders to promote safeguarding best practices and advocate for the rights and well-being of individuals.

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# SECTION 1: SCOPE AND PURPOSE

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## Who does this policy apply to?

This policy applies to all RtD staff, players, student athletes, parents/guardians, volunteers, partner organisations and their representatives, and any person visiting our clubs and academies or attending our programs and activities.

The policy applies specifically to any incidents of harassment and abuse that occur during or in connection with RtD's program and activities.

Where a concern is raised about the conduct of an employee of RtD the matter will be considered in line with RtD's grievance and disciplinary procedures outlined in their employee handbook or contracts of employment.

However, where a participant is sanctioned under employment procedures, this can be addressed under this policy to the extent that it impacts on the participant's suitability to continue to participate in football outside of their employment relationship.

## What does this policy cover?

The purpose of this policy is to ensure everyone at RtD, especially our student athletes under 18 years, can participate in football activities without fear of harassment or abuse.

The key objectives of the policy are to:

- Prevent harassment and abuse by creating a safe and inclusive environment where everyone is treated with respect and dignity.
- Ensure we have robust policies, procedures, and training in place to protect children, young people, vulnerable adults and communities from all forms of harassment and abuse.
- Provide support and guidance to our staff, players, parents and partners to help them recognise and respond appropriately to safeguarding concerns.
- Take all safeguarding concerns seriously and ensure they are promptly and thoroughly investigated, with appropriate actions taken to address any issues identified.
- Work in partnership with relevant agencies, communities, and stakeholders to promote best safeguarding practice and advocate for the rights and well-being of all associated with our programs and activities.

## Principles

The welfare and best interests of our student athletes, especially those under 18 years, and our staff will be the paramount consideration in everything we do.

Everyone has an equal right to protection from harm regardless of their gender, culture, ethnicity, age, religion, sexual orientation, or ability.

Where a concern is raised about a child, RtD shall always act in the best interests of the child recognising that all adults have a responsibility to report concerns that a child may be at risk of harm.

Where a concern relates to an adult, that adult will be supported to take a lead in deciding what action is taken in respect of the concern.

RtD will implement a Safeguarding Framework based on this policy which recognises the different cultures, legislation and safeguarding systems that exist in the different countries where its clubs and academies operate.

## Background

The Fédération Internationale de Football Association (FIFA) is an international self-regulatory governing body of association football. FIFA is actively working to improve the lives of people around the world to promote a fairer, more equal society through football.

Through the FIFA Statutes, FIFA is committed to respecting all internationally recognised human rights and promoting the protection of these rights. It has the obligation to constantly promote football globally in the light of its unifying, educational, cultural and humanitarian values. FIFA implements programmes to uphold human rights through its activities and relationships across the six continents.

Article 3 of the FIFA Statutes states that “Every person and organisation involved in the game of football is obliged to observe the Statutes and regulations of FIFA as well as the principles of fair play.”

[Article 23 of the FIFA Code of Ethics](#) addresses the protection of physical and mental integrity:

- 1) Persons bound by this Code shall protect, respect and safeguard the integrity and personal dignity of others.
- 2) Persons bound by this Code shall not use offensive gestures and language in order to insult someone in any way or to incite others to hatred or violence.
- 3) Persons bound by this Code must refrain from all forms of physical or mental abuse, all forms of harassment, and all other hostile acts intended to isolate, ostracise or harm the dignity of a person.
- 4) Threats, the promise of advantages, coercion and all forms of sexual abuse, harassment and exploitation are particularly prohibited.
- 5) Violation of this article shall be sanctioned with an appropriate fine of at least CHF 10,000 as well as a ban on taking part in any football-related activity for a minimum of two years. In cases of sexual exploitation or abuse, or in serious cases and/or in the case of repetition, a ban on taking part in any football related activity may be pronounced for a minimum of ten years.

Children (all those under 18) have specific rights to protection, as articulated in the United Nations Convention on the Rights of the Child (1989), because of their need to be cared for and owing to their dependency on others.

RtD recognises that safeguarding young players under the age of 18 years is of paramount importance.

RtD also understands its responsibility to safeguard extends beyond children to prevent the abuse of all persons and communities associated with their programs and activities.

## SECTION 2: DEFINITIONS

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| WHAT                            | DEFINITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bullying (cyberbullying online) | Unwanted, repeated and intentional, aggressive behaviour usually among peers, and can involve a real or perceived power imbalance. It can include actions such as making threats, spreading rumours or falsehoods, attacking someone physically or verbally and deliberately excluding someone.                                                                                                                                                                                                                                         |
| Financial abuse                 | The misappropriation of financial resources or abusive use of financial control, in the context of a relationship where there is an expectation of trust. Adults at risk, families living in poverty, women in unequal relationships and older persons can be at risk of financial abuse. In sport families are often financially exploited by rogue agents promising a sporting career overseas for their children.                                                                                                                    |
| Grooming                        | When a person builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited, or trafficked. Anybody can be a groomer, no matter their age, gender or race. Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional.                                                                      |
| Harassment and abuse            | Can be based on any grounds including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age, disability, socio-economic status, and athletic ability. It can include a one-off incident or a series of incidents. It may be in person or online. Harassment may be deliberate, unsolicited, and coercive. Harassment and abuse often results from an abuse of authority, meaning the improper use of a position of influence, power, or authority by an individual against another person. |
| Hazing                          | Occurs in many different types of social groups, including sports teams as a way of initiating a new person when they join the group or want to be socially accepted by their peers. This may involve harmful or humiliating actions that can lead to physical, sexual, or psychological harm.                                                                                                                                                                                                                                          |
| Neglect                         | The failure to provide for a child's basic needs when those responsible for their care have the means, knowledge and access to services to do so, whether it be adequate food, clothing, hygiene, supervision or shelter, that is likely to result in the serious impairment of a child's health or development. It also includes failure to protect a child from exposure to danger.                                                                                                                                                   |
| Peer abuse                      | Incidents when a child or young person is exploited, bullied, cyber-bullied and/or harmed by another person or group of similar age. The means and methods by which harassment and abuse are carried out include – contact, non-contact, verbal and via electronic communications. It may involve deliberate acts as well as failure to act and omissions or may take different forms including: grooming, trafficking, financial abuse or hazing.                                                                                      |

|                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical abuse      | Deliberately physically hurting a child and includes any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light. It mainly involves hitting (“smacking”, “slapping”) children with the hand or with an implement – a whip, stick, belt, shoe, wooden spoon, etc. But it can also involve, for example, punching, kicking, shaking, throwing, scratching, pinching, biting or burning them or breaking their bones.                                                                                                                                                                                                                                                                                                                                                                                            |
| Poor practice       | Behaviour or in-action which may not always be immediately harmful, but which falls below expected standards and needs to be addressed. Acts of harassment and abuse are more likely to occur in sporting environments where poor practice exists and where harmful behaviour is not challenged. Poor practice may lead to suspicions about an individual’s motivation, even where no harm is intended, such as being alone with a child or excessive or inappropriate touching. Poor practice can lead to a sporting environment that enables harassment and abuse to occur. Poor practice should always be addressed to ensure participants in sport can continue to enjoy a safe, inclusive and positive experience.                                                                                                                                                  |
| Psychological abuse | The persistent emotional maltreatment of a child. It is also sometimes called emotional abuse and it can have severe and persistent adverse effects on a child’s emotional development. Psychological abuse may involve deliberately telling a child that he/she is worthless, or unloved and inadequate. It may include not giving a child opportunities to express his/her views, deliberately silencing him/her, or “making fun” of what he/she says or how he/she communicates. Emotional abuse often occurs as a pattern of deliberate, prolonged, repeated non-physical behaviour within a power-differentiated relationship. Emotional abuse may involve bullying – including online bullying through social networks, online games or mobile phones – by a child’s peers.                                                                                        |
| Sexual abuse        | The inducement or coercion of a child to engage in any unlawful sexual activity. It occurs when adults exploit children sexually for their own gratification. It may involve physical contact, such as assault by penetration (for example, rape) or nonpenetrative acts, such as kissing, rubbing and touching children’s private body parts. Sexual abuse does not necessarily involve contact; examples include involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse by gaining their trust (including via social media). In the majority of cases, the perpetrator is a person the child knows and trusts with sexual abuse often perpetrated in isolated, one-on-one situations. |
| Sexual harassment   | A continuum of unacceptable and unwelcome behaviour and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Trafficking         | Where people, usually women or children, are recruited, moved, or transported and then exploited, forced to work, or sold. They are often moved away from their homes and forced to work in the sex trade. Trafficking through sport is common and is usually associated with financial abuse.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

# SECTION 3: YOUR RESPONSIBILITIES

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## RtD Group Board

| ROLE                                         | RESPONSIBILITIES                                                                                                                     |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Right to Dream Group Board                   | Approve this policy and maintain an oversight of safeguarding matters across the organisation.                                       |
| One member of the Right to Dream Group Board | Champion safeguarding across the organisation and lead the board's oversight of the organisation's safeguarding policy and practice. |

## Senior Leadership Team

| ROLE                                     | RESPONSIBILITIES                                              |
|------------------------------------------|---------------------------------------------------------------|
| Senior Leadership Team                   | Implement Right to Dream's safeguarding policy and protocols. |
| One member of the Senior Leadership Team | Manage the Designated Safeguarding Lead                       |

## Designated Safeguarding Lead

| ROLE                         | RESPONSIBILITIES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Designated Safeguarding Lead | <ul style="list-style-type: none"><li>• Implement group-wide safeguarding policy and ensure all clubs and academies have consistent, up-to-date safeguarding protocols covering all aspects of student-athlete, player and employee wellbeing and protection.</li><li>• Define and coordinate safeguarding training and awareness programs for different job roles.</li><li>• Implement standardized risk assessments and action plans to ensure a safe environment across the Right to Dream group.</li><li>• Establish and maintain an effective, group-wide process for reporting and managing safeguarding</li></ul> |

concerns impartially, coordinating investigations via an independent investigator.

- Develop a system to monitor, evaluate, and continuously improve safeguarding practices across all clubs and academies.

## Group Head of People

| ROLE           | RESPONSIBILITIES                                                                                                                                                      |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Head of People | Manage the designated lead and safeguarding concerns involving members of staff in accordance with their contracts of employment and relevant employment legislation. |

## Case Management Group

| ROLE                                                                                                                                    | RESPONSIBILITIES                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Case Management Group<br><br><b>Note</b> – The Case Management Group shall be established on an “ad hoc” basis and consist of 3 people. | <ul style="list-style-type: none"><li>• Triage reported safeguarding concerns and agree next steps in managing the case.</li><li>• Ensure there is no relationship between members of the Case Management Group and the persons subject to the raised concern.</li></ul> |

## Designated Safeguarding Officers

Each of the following Clubs and Academies within the Right to Dream community will appoint the Designated Safeguarding Officer(s) responsible for implementing safeguarding protocols:

- Ghana Academy
- FC Nordsjælland
- Egypt Academy/FC Masar
- RTD USA/San Diego FC
- US International Pathway (USIP)
- International Academy

The Designated Safeguarding Officer(s) will report indirectly to the Designated Safeguarding Lead at the group level and directly to the CEO or Senior Management Leader at the Club or Academy level.

| ROLE                            | RESPONSIBILITIES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Designated Safeguarding Officer | <ul style="list-style-type: none"> <li>• Implement group-wide safeguarding policy and local safeguarding protocols at the club, academy and programme level.</li> <li>• Develop up-to-date safeguarding protocols covering all aspects of student-athlete, player, and employee wellbeing and protection.</li> <li>• Coordinate safeguarding training and awareness programs for different job roles at the club, academy and programme level.</li> <li>• Conduct standardized risk assessments and action plans to ensure a safe environment at the club, academy and programme level.</li> <li>• Work with the Designated Safeguarding Lead on the management of safeguarding cases at the club, academy and programme level.</li> <li>• Report on safeguarding matters at the club, academy and programme levels to the Designated Safeguarding Lead.</li> </ul> |

# SECTION 4: RTD'S SAFEGUARDING PROTOCOLS AND FRAMEWORK

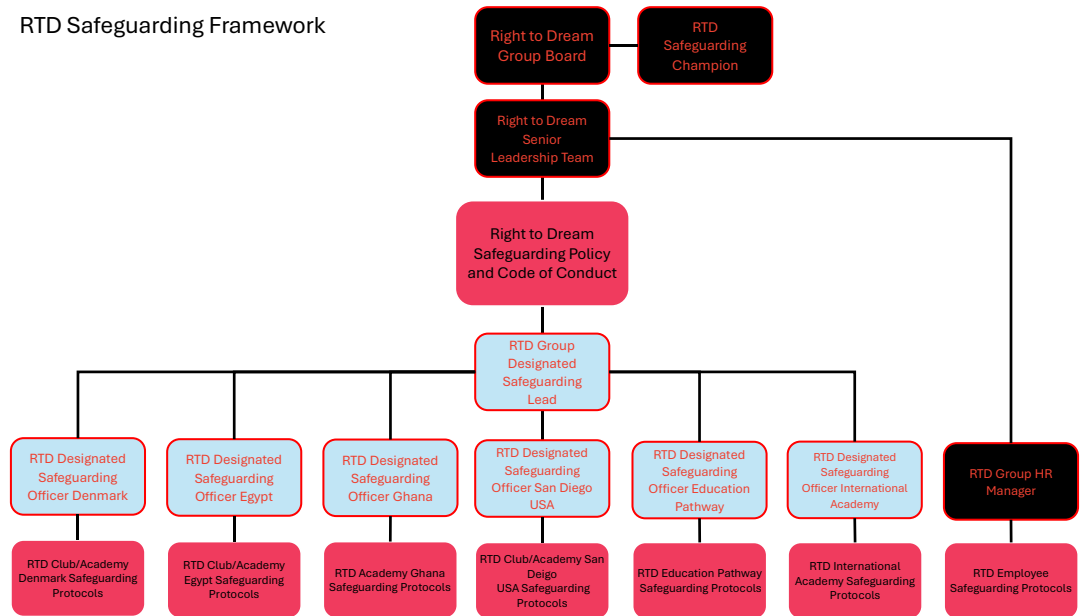
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The following protocols together with the RtD Safeguarding Policy form RtD's Safeguarding Framework:

1. Prevention of Harassment & Abuse in the Workplace Policy
2. Ghana Academy Safeguarding Protocols
3. FC Nordsjælland Safeguarding Protocols
4. Egypt Academy/FC Masar Safeguarding Protocols
5. RTD USA Academy/San Diego FC Safeguarding Protocols
6. USIP Safeguarding Protocols
7. International Academy Safeguarding Protocols
8. Guidance on Safe Recruitment and Vetting
9. Guidance on Safeguarding Awareness Training
10. Guidance on Safeguarding Risk Assessment
11. Guidance on communications and use of social media
12. Guidance of photography, video, and use of images

RtD's Safeguarding Framework consists of those policies, people and protocols put in place to ensure best safeguarding practice is embedded across the group with the aim of ensuring everyone engaged in RtD's programs and activities can participate in an environment free from harassment and abuse.

## RTD Safeguarding Framework



# SECTION 5: REPORTING AND RESPONDING TO CONCERNS

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The following measures apply to any incidents, concerns, allegations, or disclosures of harassment and abuse brought to the attention of RtD (herein after referred to as “concerns”).

Any person who reports an incident of harassment or abuse will be provided with support from RtD.

Anyone can report a concern using the following mechanisms:

- Using RtD’s anonymous online [Safeguarding Incident Reporting Form](#).
- By contacting the Group Designated Safeguarding Lead, Carmella Pugh:

In person, via phone (+44 (0)7407 437784) or email ([carmella.pugh@righttodream.com](mailto:carmella.pugh@righttodream.com) / [rtdsafe@righttodream.com](mailto:rtdsafe@righttodream.com)).

- By contacting a Designated Safeguarding Officer in your location:

Ghana: James Nortey, [jcn@righttodream.com](mailto:jcn@righttodream.com)

Denmark: Pernille Lisbjerg, [pel@fcv.dk](mailto:pel@fcv.dk)

Egypt: Farida El-Abd, [farida.elabd@righttodream.com](mailto:farida.elabd@righttodream.com)

International Academy: Theo Quartey, [theo.quartey@righttodream.com](mailto:theo.quartey@righttodream.com)

US IP: Adelaide Armah, [adelaide.armah@righttodream.com](mailto:adelaide.armah@righttodream.com)

San Diego: Becky Litwiller, [becky.litwiller@sandiegofc.com](mailto:becky.litwiller@sandiegofc.com)

Any person who makes a complaint of harassment or abuse to RtD and believes the concern has not been processed in accordance with the policy can write to:

RtD CEO: Dan Dickinson

Email: [dan.dickinson@righttodream.com](mailto:dan.dickinson@righttodream.com)

Phone: +44 (0)73242 102703

Any criminal incidents of harassment and abuse that are perpetrated against a child or other person must be reported to Law Enforcement, Child Protection Services, or other relevant authority in accordance with legal requirements of the country where the incident occurred or to one of RtD’s Designated Safeguarding Lead or Safeguarding Officers who will then make the required referrals.

## Whistleblowing

Although safeguarding concerns can be reported directly by an affected individual, the term whistle blowing is used to describe a concern relating to the conduct of an individual made by someone other than the affected person.

RtD recognises that some individuals may be fearful of the consequences of making a concern under these procedures, particularly where the alleged perpetrator is in a position of authority. In these circumstances, where possible, the identity of the whistle blower will remain confidential.

Any person who raises a concern in good faith must not be subject to reprisal or other adverse consequences because of submitting a report.

These protections shall not apply to a person who intentionally raise a concern that is false, vexatious, retaliatory, or frivolous.

FCN/RtD's anonymous [Whistleblowing](#) site can also be used to report concerns of misconduct in line with the European Union Whistleblowing Directive; including concerns of bribery, fraud and corruption.

## Initial assessment

Any concerns pursuant to this policy received by RtD will be referred to the Designated Safeguarding Lead and/or a Designated Safeguarding Officer who are the first points of contact for concerns raised under this policy.

The Designated Safeguarding Lead and/or a Designated Safeguarding Officer will make an initial assessment of the concern to determine whether the matter relates to a person or persons taking part in RtD's program and activities.

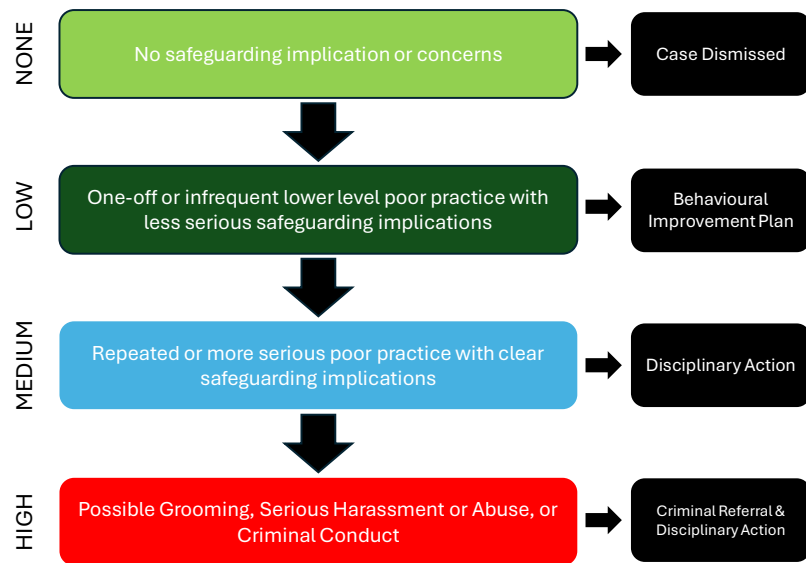
If the concern is believed to be a criminal matter, and a child or adult is thought to be in immediate danger, the Designated Safeguarding Lead and/or a Designated Safeguarding Officer will refer the matter to the relevant law enforcement authorities or statutory authorities in the jurisdiction where the act is alleged to have taken place without delay.

## Case management

After having considered whether the concern needed to be referred to law enforcement or other authorities and having reported the matter, the raised concern should be considered by a Case Management Group. This group should be no less than three persons and be drawn from RtD's designated safeguarding lead/officers, Head of People/People Partner and independent safeguarding, legal or social welfare experts.

The Case Management Group shall triage the raised concern to determine how it should be managed.

The Case Management Group may commission an independent investigation where further information is needed to make an informed decision on the matter.



Having triaged the received concern, the Case Management Group may choose:

- To dismiss the concern where there are no safeguarding implications or where the concerns raised are unfounded or insufficiently serious as to require any action by RtD.
- To refer the matter to appropriate staff to initiate remedial action such as training where the concern is considered to be poor practice that can be corrected.
- To refer the matter to a Disciplinary Panel where the concern raised is a medium or high-level concern.
- To refer the concern to another body where the concern falls outside the jurisdiction of RtD.
- To refer the matter to law enforcement or another statutory authority where new information gathered during the investigation suggests possible criminal conduct.

## Support for victims and alleged perpetrators

RtD's Designated Safeguarding Lead will assess whether any of the affected parties require support including possible trauma counselling and will make arrangements for such support.

## Confidentiality

RtD recognizes the sensitive and serious nature of cases of harassment and abuse and will strive to keep all matters relating to a concern confidential. Information will only be disclosed to those organisations or individuals that "need to know" to manage the concern. Anyone who is party to information involved must also ensure that confidentiality is maintained unless the information becomes a matter of public record.

## Interim measures

RtD may impose interim protective measures, including the suspension of a person from RtD and its program and activities, where one or more of the following circumstances applies:

- a) The person is believed to present a significant risk to participants in RtD programs or activities.
- b) The reputation of RtD or one of its partners is at risk.
- c) The persons ongoing presence may hinder investigations into the concern.

## Investigation

RtD will pause an investigation into a raised concern where it is known that the matter is under criminal investigation until they are given clearance by the investigating officer in order to not impede the criminal investigation. Once clearance to proceed has been obtained from local law enforcement, any internal investigation can proceed in a timely manner.

Where an investigation is required, RtD will instruct an independent investigator to carry out the investigation, in accordance with these procedures, and to an appropriate timeline agreed with the Designated Safeguarding Lead or the Head of People.

Where relevant, the independent investigator may request information from the local law enforcement and any other relevant organizations.

The independent investigator may require written or oral representations from relevant parties, taking special care when interviewing vulnerable witnesses.

The independent investigator shall prepare a report and include all relevant evidence for consideration by the Case Management Group who having considered the report may determine that:

- a) The concern requires further investigation.
- b) There is a case to answer, and the concern should be referred to a Disciplinary Panel for adjudication.
- c) The concern constitutes low level poor practice and can be resolved through remedial action such as providing the relevant party(ies) with instructions, advice, or guidance.
- d) No further action should be taken.

## Disciplinary and appeals proceedings

Where disciplinary proceedings are to proceed against a member of RtD staff, the matter will progress in accordance with RtD's terms and conditions of employment or employee handbook for the location.

Where disciplinary proceedings, are to progress against a person who is not a member of staff the matter will be considered by a Disciplinary Panel independent of RtD. Appeals to decisions of an independent Disciplinary Panel may be considered by a separate independent Appeal Panel.

Disciplinary and Appeals Panels will consist of three persons independent of RtD of which the Chairperson being legally qualified. The Chairperson will set the rules for the hearing.

The standard of proof for such proceedings is the civil standard of balance of probabilities. Consequently, RtD may seek to take disciplinary action irrespective of the outcome of any criminal proceedings.

RtD will provide appropriate support and guidance to ensure all participants understand the disciplinary and appeal procedures, especially if children or vulnerable persons are involved.

## Sanctions

Where it is determined that an act or acts of harassment and abuse have been proven, the Disciplinary Panel shall impose an appropriate sanction upon the person.

The Disciplinary Panel may consider, singly or in combination, depending on the nature and severity of the conduct and whether there are any aggravating and mitigating circumstances the following sanctions:

- Written or verbal apology
- Formal warning
- Fine
- Training and/or Supervision
- Temporary suspension
- Termination of membership, license, agreement, contract, or registration
- Any other sanction that the Disciplinary Panel considers appropriate in the circumstances

## Appeals

Any person(s) who have been found to have harassed or abused another person by a Disciplinary Panel will have the right to appeal against the decision.

Appeals must be made in writing to the Chairman of the Disciplinary Panel within 14 days of the notice of the decision of the Disciplinary Panel.

RtD will appoint an independent Appeals Panel comprised of three suitably qualified persons to hear the appeal in a timely manner.

## Non-recent incidents

Serious allegations of sexual abuse may be made some time after the event. Where a non-recent allegation is made, the designated safeguarding lead will:

- Clarify whether there is a current risk to student-athletes or other vulnerable persons participating in or associated with RtD's programs and activities; and
- Advise the individual of their right to make a formal concern to law enforcement and support them in doing so.

This policy does not apply any specific limitations periods for sexual abuse and any serious allegation of non-recent sexual abuse will be treated in accordance with these procedures.

## Criminal convictions & findings of fact

RtD shall establish that an incident of harassment and abuse has occurred where:

- a person has been convicted of a criminal offence of harassment or abuse against another person (s) in any legal jurisdiction; or,
- a recognized sports or regulatory body has determined that an allegation(s) of harassment and abuse against another person (s) is/are proven.

RtD having considered any representations made by the person, and any other affected parties, may determine that it is appropriate to refer the case to a Disciplinary Panel.

# SECTION 6: DATA PROTECTION

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Any information relating to concerns of harassment and abuse will be stored securely and in accordance with relevant Data Protection legislation.

Any information about poor practice or concerns about harassment and violence that may indicate that a participant in a position of trust is unsuitable to work or volunteer in the sport will be retained for as long as the participant remains active in the sport or for 10 years, whichever is longer, even if it were not possible at the time that the information was first reported to instigate any formal proceedings.

Any other records relating to other concerns will be retained for a period of 3 years unless a similar concern arises within that period.

Any records relating to disciplinary action taken by RtD will be retained for a period of 5 years after the sanction has lapsed.

# SECTION 7: ASSURANCE AND AUDIT

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As part of its due diligence in ensuring our policies are followed, and in tandem with this policy being reviewed and updated as required annually, RtD Group will undertake assurance and audit both following any safeguarding incident but also annually. This will be led by Group Operations and may include external consultant resource if deemed appropriate.