



Ten Tors Safeguarding Policy

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CHAPTER 1

CHILD PROTECTION AND SAFEGUARDING POLICY

1.1 It is Director Ten Tors' policy to promote and ensure the welfare of all participants¹ in Ten Tors (TT)² and to safeguard participants from harm; defined as physical, sexual or emotional abuse and neglect by:

- a. Ensuring the welfare of participating young people is paramount;
- b. Taking into account in all its considerations and activities, the interests and wellbeing of participants;
- c. Respecting the rights, wishes and feelings of the participants with whom it is working;
- d. Taking all reasonable steps to protect participants from harm;
- e. Promoting the welfare and protection of participants through good practice and adherence to relevant statutory obligations.

1.2 All participants have the right to protection from all forms of abuse and harm when taking part in TT.

1.3 It is the primary responsibility of supervising staff from the participating establishments³, supported by all TT organisers⁴ to; safeguard the welfare of participants regardless of gender, religion, race, ability, sexuality and social background by protecting them from any form of physical, emotional and sexual abuse or neglect.

1.4 All TT organisers have a duty of care, which makes them responsible both for safeguarding participants from harm and for responding swiftly and appropriately when suspicions or allegations of inappropriate behaviour arise.

1.5 The organisers' aim to ensure that all participants are kept safe from harm while they are participating in TT by:

- a. Providing participants, parents and establishments with information about what we do and what they can expect from us.
- b. Making sure that all organisers are appropriately selected, trained and suitable for their role.
- d. Providing a means for participants, team staff, families and organisers to report their concerns regarding the safety and wellbeing of TT participants.

¹ Participants are defined as those young people within the specified age ranges permitted to take part in TT, including travelling reserves. It does not include visitors, visiting or spectating families, children or young people, for whom parents or guardians remain responsible.

² TT is the generic term used for the TT Challenge and Jubilee Challenge.

³ Participating establishments are schools, education establishments, youth groups, cadet forces or other organisations entering teams or individuals in accordance with the TT Rules.

⁴ TT organisers are those military personnel, contracted personnel, specialist volunteers, third sector charities, voluntary organisations or any other persons acting in a supervisory or staff capacity to deliver activities or support functions for, or on behalf of, Director TT and for whom Director TT assumes authority and responsibility.

- e. Providing a network of trained adults to ensure the safety of all participants throughout TT.
- f. Ensuring that only those adults who are properly appointed have unsupervised access to participants.
- g. Ensuring that only those TT safety, medical or rescue staff directed to assist participants have necessary access to young people.
- h. Developing a culture of thinking and acting safely.

CHAPTER 2

PREVENTING CHILD ABUSE

2.0 Preventing child abuse is the responsibility of all TT organisers.

2.1 Promoting the welfare of participants and safeguarding them from harm is every adult's responsibility. Most child abuse can be prevented. Participants will and should see all TT organisers as people they can trust and from whom they can seek help.

2.2 TT organisers must act if:

- a. Participants disclose, or shows signs, that they are being abused in any way;
- b. There are concerns about the welfare or safety of any participant;
- c. There are concerns about unsafe practice;
- d. A personal allegation of abuse is received or an allegation of abuse about any other person;

2.3 Adult Duty to Speak Out (often described as "whistleblowing"). Any safeguarding concern is an exception to the normal requirement to follow the chain of command. Every TT organiser is required to report any suspicion of abuse or harm concerning a participant whether it is inside or outside TT and no one should feel, or be made to feel uncomfortable, bullied or intimidated by doing so or being coerced into not reporting these concerns.

2.4 Participant's Freedom to Speak Out. Participants should feel comfortable and free to report, at any time, any safeguarding concerns within or outside TT to any organiser. Participants must have confidence they are being listened to.

2.5 Support and Advice. Participants, staff from establishments and parents can seek advice on child protection matters from the designated TT Child Protection Officer (TT CPO), details for whom will be promulgated through the TT website annually.

2.6 The TT CPO is the immediate source of advice relating to all child protection matters during TT for all TT organisers. The TT CPO may, in exceptional circumstances, issue mandatory advice in respect of the management of child protection incidents.

CHAPTER 3

SAFER RECRUITMENT

3.0 TT organisers are drawn from across society, comprising military personnel and civilians. Director TT does not recruit all personnel attending; however, it is Director TT's responsibility to ensure those adults attending TT are appropriate for the role they are undertaking. Safer recruitment helps to ensure those staff encountering young people have been subjected to a proportionate level of scrutiny and vetting and therefore contributes to the overall safety of the participants and protects the reputation of the event. For those military personnel in attendance most will be on duty as a requirement of their unit tasking, others are long standing volunteers whose attendance is sanctioned by their CoC. TT is also supported by a myriad of statutory and voluntary organisations including Devon and Cornwall Constabulary (D&C Const), Dartmoor Mountain Rescue Group (DRG), St John's Ambulance (SJA), JC Systems and Landmarc.

3.1 The various roles undertaken by TT organisers differ in their contact with young people. Military personnel providing logistic support are unlikely to have direct contact with participants and have no face to face responsibilities whereas Tor parties, DRG and SJA will all have significant face to face contact with TT participants. The level of scrutiny applied to each role therefore varies; however, each adult attending TT is required to adhere to this policy irrespective of whether a specific check is annotated for their role.

3.2 TT roles are viewed through the following lens:

- a. Enabling roles – administrative roles with no direct responsibilities to support participants, this includes Landmarc personnel and all G4 functions, camp security, car parking, camp site fire piquets etc.
- b. Operational supporting roles – operational staff whose primary responsibility is to directly support the delivery and control of the event including HQ staff, Ops room staff, JC systems tracking staff, public communications staff. These personnel are unlikely to have direct responsibility to support participants.
- c. Operational delivery roles – these groupings have variable interaction with participants and as such are most likely to engage with participants, either in a supervisory or safety capacity. These roles include, Tor parties, ECMs, Scrutineers, DRG

3.3 Vetting and scrutiny of adults supporting this event must be proportionate to the risk and comply with the requirements of SVGA (2006)⁵. In many instances this will include a DBS⁶ check; however, DBS checks are required only where the activity is considered a regulated activity. TT is anomalous in this regard, in that, the participants are drawn from regulated activity⁷ settings (schools and youth groups); however, the TT event is not in itself a regulated activity. TT does; however, require young people to be supervised on consecutive overnight camps and does therefore comply with the requirements of SVGA (2006, Schedule 4, Para 10(2)).

⁵ SVGA (2006) – Safeguarding Vulnerable Groups Act 2006 – Schedule 4

⁶ Disclosure and Barring Service

⁷ Regulated Activity in relation to children: scope. Factual note by HM Government

3.4 TT adult organisers in certain roles will be required to comply with vetting and screening procedures as follows:

Category	Role	Self-Declaration	DBS Check (Type)	Accountable Body
Enabling Role	All enabling roles	Not required	Not required	CoC
Operational Supporting role	HQ staff	Not required	Not required	CoC
	Ops Room Staff	Not required	Not required	CoC
	Communications and Public Information Staff	Not required	Not required	CoC
	JC Systems	Not required	Not required	Stipulated in Contract
	MS Group	Not required	Not required	
Operational Delivery Role	Scrutineers and ECMs –	Declaration of any relevant criminal conviction ⁸	If holder has an extant ⁹ DBS check, this will be accepted	CoC
	SJA		Enhanced with Barred List	Stipulated in Contract
	Tor Party staff	Delayed to 2023	Delayed to 2023	CoC
	DRG – Does not work with participants in an unsupervised capacity		Not required, complies with relevant statutory guidance. No unsupervised access.	MoU to stipulate suitable vetting required as detailed.
	D&C 4x4 – Does not work with participants in an unsupervised capacity		Not required, complies with relevant statutory guidance. No unsupervised access.	MoU to stipulate suitable vetting required as detailed.

⁸ A relevant criminal conviction includes – murder, violence, bodily harm, sex offences (children).

⁹ Extant DBS check from a current employer engaged in regulated activity eg school, youth group, statutory agency

CHAPTER 4

PROCEDURES & GOOD PRACTICE

4.0 TT takes place over a weekend; the period of direct responsibility for TT organisers is therefore short. However, given the nature of the event, likelihood of injury or exhaustion through exposure to testing conditions, there is significant risk that staff may find themselves accompanying, comforting or caring for young people whilst they are in a temporarily vulnerable state.

4.1 Director TT will, from time to time, issue instructions to all TT organisers for use when responding to allegations of child abuse or concerns about the welfare of participants. The MOD process for dealing with allegations is detailed in JSP 834 (Safeguarding Children); however, specific guidance for TT organisers is attached at Annex A.

4.2 Everyone involved with TT must take any allegation or concern about the welfare of participants seriously and act immediately in accordance with Annex A.

4.3 Those with Command responsibility at all levels must be aware of the risks and report allegations of child abuse or concerns about the welfare of participants in accordance with Annex A.

4.4 Immediate actions on guidance is contained at Annex B.

4.5 Commanding Officers of military personnel must ensure that any non-compliance with this TT Safeguarding Policy and procedures is dealt with appropriately.

CHAPTER 5

PHOTOGRAPHY AND SOCIAL MEDIA

5.0 As a condition of entry, parents/guardians give their approval through their sponsoring establishment for suitable and appropriate photographs to be taken and published by official photographers¹⁰. However, there are limitations to which this permission extends. The GDPR (Data Protection Act 2018) 2018 specifies the limitations of use, purposes for which such material can be retained and regulations for its safe storage.

5.1 **Official Photographers.** Director TT authorises specific individuals to act on behalf of the event to take photographs; this includes military photographers, sanctioned civilian photographers and sanctioned supporting organisation photographers (for example Dartmoor Rescue Group, British Red Cross etc).

5.2 **Civilian Media.** Civilian media reports this event through print, voice, electronic (social) and televised media platforms. These organisations are bound by professional standards. MOD's Media Support Group will liaise with and control access by the civilian media.

5.3 **Sponsoring Establishments.** Team managers, supporters and helpers will inevitably want to photograph their own teams; before during and after the challenges. The nature of this photography is such that it is deemed "official" and therefore permitted, providing that such photographs are not inappropriately used or shared by individuals on private networks and should only be uploaded on to official school or youth group social media or websites.

5.4 **Parents, Family and Friends.** The start, finish and presentations are a focus for parents, family and friends. Inevitably, they attract high levels of photography, which by law, is acceptable¹¹.

5.5 **TT Organisers.** TT organisers should not photograph participants other than where immediately transmissible images will aid the conduct of young people to safety or to assist immediate medical relief. Images taken at TT are subject to GDPR 2018 regulations, which will not permit the retention or use of such photographs on private networks by TT organisers. Participants in the JC carry or wear specific markers indicating they are not to be photographed.

The reputation of individuals is at risk if complaints are received regarding images or the taking of images. Organisers are to be aware of the risks posed by perceived inappropriate photography and must be aware that images uploaded onto social media websites or other networking sharing websites also risks the reputation of TT.

5.6 **Inappropriate photography.** The proliferation of inappropriate images on the internet is such that all adults should be alert to and aware of, inappropriate photography; this may include images of young people of a sexual nature, inappropriately dressed, posing sexually, or images focussed on specific body parts. TT organisers should report their concerns immediately, to the TT CPO, in accordance with Annex A.

¹⁰ Sponsoring establishments include, but are not restricted to: schools, registered youth groups, scouts, guides, cadet forces, sports clubs and specialist youth groups.

¹¹ Taking photographs of a non-specific nature at a public event, where those being photographed cannot reasonably expect privacy, is legal; however, any attempt to publish photographs giving names, addresses or personal information without the express permission of the subjects is illegal. Young people under 18 yrs cannot grant permission for the publication of their image.

CHAPTER 6

VULNERABILITY - DO'S AND DON'TS

6.0 This chapter can be circulated as a short summary of good practice for TT organisers to retain whilst at TT. Supervising Tor parties, check point staff, medical and rescue staff are more likely to encounter young people in a vulnerable state and as such must ensure they act within the guidance provided.

6.1 Medical staff are DBS checked by their respective chain of command or sponsor organisation; however, they must remain cognisant of this policy and adhere to the guidance provided.

6.2 Rescue staff may be DBS checked as part of their requirement with their sponsor organisation; however, they must remain cognisant of this policy and adhere to the guidance provided.

6.3 DBS checks are not required on staff who do not have unsupervised or regular contact with children and young people; therefore, all staff must remain cognisant of this policy and adhere to the guidance provided.

6.4 **Good Practice means:**

- Never being alone with participants.
- Always working in an open environment, where possible, avoiding private or unobserved situations and encouraging open communication.
- Treating all young people equally with respect and dignity.
- Always putting the welfare of participants first.
- Maintaining a safe and appropriate distance from young people.
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of participants.

6.5 **Vulnerable means:**

- Young people through cognitive impairment are susceptible to suggestion.
- Young people with physical disabilities are at higher risk.
- Young people can be easily swayed to make inappropriate decisions.
- Young people under the influence of drugs or alcohol.
- Young people previously exposed to harm, including sexual, emotional or physical abuse or neglect.
- Young people who are injured or ill, suffering heat or cold injuries.

6.6 Code of Conduct

Do:

- Observe this Ten Tors Safeguarding policy and put into practice this Code of Conduct.
- Act immediately on any allegation, suspicion or concern.
- Treat everyone with respect and provide an example you wish others to follow.
- Plan activities to ensure more than one person is present, or at least within sight or hearing of others.
- Where achievable, plan to have both male and female staff in any group.
- Respect young people's right to privacy.
- Provide access for participants to talk and treat allegations seriously.
- Encourage participants and organisers to challenge attitudes or behaviour that do not meet the standards of this policy.
- Remember that others may misinterpret your actions no matter how well intended.
- Keep other organisers informed of what you are doing.
- Take allegations of abuse or bullying seriously.
- Encourage a team spirit, get TT participants to help each other with kit, equipment, load carrying or other occasions where touch is likely.
- Remember this code at sensitive moments, such as illness, injury, bullying, bereavement or abuse.

Do not:

- Spend time alone with TT participants.
- Permit or encourage TT participants to consume alcohol or drugs.
- Permit abusive peer activities, eg bullying, initiations.
- Participate in physical contact games or horseplay.
- Allow or engage in any forms of inappropriate physical, sexual or verbal contact with TT participants, including contact by text, email or social media.

- Allow the use of inappropriate language or behaviour to go unchallenged.
- Allow yourself to become the focus of inappropriate attention seeking behaviour such as tantrums or crushes.
- Show favouritism to any TT participant.
- Rely on your good name to protect you.
- Over-react or jump to conclusions without checking the facts first.
- Believe it “could never happen to me”.
- Allow or engage in any inappropriate relationships with TT participants, that is a breach of your trust.
- Trivialise abuse or bullying.
- Make inappropriate suggestive remarks or jokes to TT participants.
- Let allegations or suspicions of abuse or bullying go unreported.
- Help or support young people to remove or put on kit or equipment.
- Touch young people, unless absolutely required as part of a medical emergency.

CHAPTER 7

DATA PROTECTION – GDPR COMPLIANCE

7.0 Retaining the details of safeguarding incidents during TT is necessary to aid subsequent investigations; however, not all reported incidents will result in investigatory action by either Service or civilian agencies. Disclosure of recorded details must be in compliance with extant data protection legislation and as such the authority of TT Director must be sought before information is released, unless this forms part of a statutory children's services or authorised police investigation.

7.1 Incidents are to be recorded on the appropriate Annex A form, appended to this policy, thereafter the details are to be transferred onto an electronic record controlled by SO2 IM. The electronic data base is to be accessible to the following personnel:

- a. Director TT
- b. TT CPO
- c. SO2 IM

7.2 The law dictates that information can be retained, but must be destroyed after a set period of time. Participants in TT are aged 14 – 19 years and records must be retained until the participant attains the age of 21 years. This affords the parents or legal guardians of the young person affected a period until the young person attains 18 years in which to bring a complaint and permits the young person themselves a further 3 years in which to lodge a complaint in their own right. On this basis, the following retention schedules apply:

- a. Paper Records (Annex A) – retained for 7 years, accessible for 2 years, then archived for 5 years.
- b. Electronic records – accessible for 2 years, then archived for 5 years.
- c. All records destroyed after 7 years.

REPORTING CHILD ABUSE

1. It is a legal obligation to report child abuse or suspected child abuse. This procedure is designed to ensure that child abuse is reported in such a way that all those involved are acting with sufficient compassion to support participants and providing enough information to allow investigating authorities¹² to adequately protect participants and where appropriate seek successful prosecution of perpetrators. The report must be compiled by the adult to whom a participant discloses or has witnessed or suspects abuse. Reports are not to be made by third parties. All reports are to be submitted to the TT CPO.

2. Whilst the likelihood of disclosure by a participant(s) at TT remains very low, it remains a possibility. TT organisers could, therefore, need to make a disclosure report. The guidance below is designed to help TT organisers deal with a difficult and traumatic situation; one in which there are high degrees of vulnerability for both staff and young people. Working alone in these environments is not recommended and TT organisers should always ensure that a colleague is present within line of sight or earshot if a young person requests to speak privately. TT organisers should always inform participants that conversations, including confidential conversations, are unlikely to remain private and disclosure is a legal requirement.

3. **If a participant confides in you:**
 - a. **Do:**
 - React calmly, ask a colleague to remain within discreet line of sight or earshot.
 - Tell them you will be telling someone in authority.
 - Give them time to say what they want to say without interrupting.
 - Reassure the participant that they were right to tell and that they are not to blame.
 - Keep questions to an absolute minimum to ensure a clear and accurate understanding of what has been said.
 - Inform the participant what you will do next, ie pass the information on.
 - Make a full, written record of what has been said/heard as soon as possible.
 - Ensure the young person is safe from further harm.
 - Inform the TT CPO immediately.

¹² Investigating authorities include UK police forces, statutory social services or other child protection agencies.

Do Not:

- Investigate the disclosure - Make notes when speaking with the participant.
- Report your opinions or feelings, report only facts as presented by the participant.
- Share this information with anyone other than the TT CPO.
- Ask about explicit details and do not ask to see bruises/injuries.
- Do not promise confidentiality, which might not be possible.
- Delay in passing on the information to the TT CPO.

4. If a TT organiser is concerned about a child they should:

- Write down what has happened, what they have been told, using the person's words then sign and date the notes.
- Immediately inform the TT CPO and provide written notes using the format below.
- Ensure that no immediate action is required to protect the young person from further harm.

DO NOT investigate or pass judgement; it is the TT organiser's responsibility to record what they have been told and pass it on.

In an emergency i.e. where any child is at immediate risk of significant harm, TT organisers must contact the Police directly, then inform the TT CPO.

It is NOT a TT organiser's job to substantiate their concerns, investigate or pass judgement; they must record what they have been told and pass it on.

If TT organisers are in any doubt, speak directly to the TT CPO.

TT Child Protection Report	
TT Organiser Details	Name: Appointment: Unit: Contact Numbers: Contact email:
Young Person's Details	Name: Age: Home address: School/Youth Group: Contact Numbers:
What Happened (Disclosure only) The child's account of what has happened and how bruising or other injuries occurred.	Nature of the allegation, including dates and times if disclosed:
What Happened (Abuse suspected, or observation of inappropriate behaviour)	Nature of the allegation, including dates and times if possible:
Other relevant information (facts only).	A description of any visible bruising or other injuries. Also any indirect signs, such as behaviour.
Witnesses	Details of witnesses to the incident(s) if relevant:

	Name: Address: Contact Numbers:
Other Involvement	Has anyone else been consulted, informed? Name: Address: Organisation (if appropriate): Contact Numbers:
Signatures	Name: Date:
TT CPO	Received Date: Reported to: Actioned by:

The Designated Person (TT CPO) will receive the report and take the appropriate action, this may include contacting the Police, Local Authority Children’s Services team, Local Authority Designated Officer, or Multi-Agency Safeguarding Hub.

Director TT notes it is not their responsibility to decide whether abuse has taken place or not, this is a decision for the appropriate authority, however they will pass on the information to the relevant body.

Use this space for keeping your own contacts/telephone numbers:

TT CPO – Lt Col Colin Gordon – 07768 467161

TT SO1 – Lt Col Dominic Maxwell-Batten.

ACTIONS ON –

The following paragraphs are provided as guidance for immediate responses to a safeguarding incident:

1. Touch - Allegations are made regarding a staff member or other adult inappropriately touching young people –
 - a. Ensure the young person(s) involved are removed to a place of safety and are supported and re-assured in the presence of two adults.
 - b. Request the presence of the TT CPO to the location, via the Ops room.
 - c. Commence the reporting procedure at Annex A.
 - d. Where the young person(s) identify the alleged perpetrator, ensure this information is readily available to be passed to the police.
 - e. DO NOT intervene to detain or restrain any alleged perpetrator.
 - f. Minimise the interaction between the young people and others (ie where possible, limit the use of social media, texting, phoning etc.)
 - g. Hand over the incident to the Police, TT CPO or designated representative as early as possible.
 - h. Prepare statements to be provided to the police where necessary.

2. Accommodation - Allegations are made regarding a staff member or other adult inappropriately entering or accessing accommodation occupied by young people –
 - a. Ensure the young person(s) involved are removed to a place of safety and are supported and re-assured in the presence of two adults.
 - b. Request the presence of the TT CPO to the location, via the Ops room.
 - c. Commence the reporting procedure at Annex A.
 - d. Where the young person(s) identify the alleged perpetrator, ensure this information is readily available to be passed to the police.
 - e. DO NOT intervene to detain or restrain any alleged perpetrator.
 - f. Minimise the interaction between the young people and others (ie where possible, limit the use of social media, texting, phoning etc.)
 - g. Hand over the incident to the Police, TT CPO or designated representative as early as possible.
 - h. Prepare statements to be provided to the police where necessary.

3. Violence - Allegations are made regarding a staff member or other adult using violence against young people –

- a. Ensure the young person(s) involved are removed to a place of safety and are supported and re-assured in the presence of two adults.
 - b. Request the presence of the TT CPO to the location, via the Ops room.
 - c. Request the presence of the medical staff and if necessary commence first response first aid.
 - d. Commence the reporting procedure at Annex A.
 - e. Where the young person(s) identify the alleged perpetrator, ensure this information is readily available to be passed to the police.
 - f. DO NOT intervene to detain or restrain any alleged perpetrator.
 - g. Minimise the interaction between the young people and others (ie where possible, limit the use of social media, texting, phoning etc.)
 - h. Hand over the incident to the Police, TT CPO or designated representative as early as possible.
 - i. Prepare statements to be provided to the police where necessary.
4. Alcohol, drugs or other illegal substances - Allegations are made, or you become aware of young people using alcohol, drugs or other illegal substances –
- a. Ensure the young person(s) involved are removed to a place of safety and are supported and re-assured in the presence of two adults.
 - b. Request the presence of the TT CPO to the location, via the Ops room.
 - c. Request the presence of the medical staff and if necessary commence first response first aid.
 - d. Commence the reporting procedure at Annex A.
 - e. Hand over the incident to the Police, TT CPO or designated representative as early as possible.
 - f. Prepare statements to be provided to the police where necessary, specifically if you believe or are aware that the substances were supplied by an adult present.
5. Bullying or harassment - Allegations are made, or you become aware of young people bullying or harassing other participants, or adults are seen to be bullying or harassing participants –
- a. Ensure the young person(s) involved are removed to a place of safety and are supported and re-assured in the presence of two adults.
 - b. Request the presence of the TT CPO to the location, via the Ops room.
 - c. Commence the reporting procedure at Annex A.
 - d. Where the incident involves young people only, hand over the incident to the TT CPO or designated representative, who will inform the TM as early as possible.
 - e. Where the incident involves adults, prepare statements to be provided to the police where necessary