

Denbighshire Leisure Limited

Safeguarding Policy

Current Version

Approved By	Version	Date Approved	Policy Owner	Next Review Date
DLL Board of Directors	V1.4	10/12/2025	Ian Olson (Designated Safeguarding Officer)	10/12/2026

Version Control

Approved By	Date Approved	Version	Amendments in Subsequent Version
DLL Executive Team	20/09/2021	V1.0	Draft document accepted without amendment.
DLL Executive Team	24/03/2022	V1.1	Updated table of group members. Updated reference section.
DLL Executive Team	26/09/2022	V1.2	Updated table of group members. Addition of debrief with employee as part of incident process. Addition of staff DBS renewals process
DLL Safeguarding & Volunteering Group	16/03/2023	V1.3	Updated table of group members. Amendment to 10.2 Club bookings information required. Addition of 3-year refresher training on e-learning.
DLL Board of Directors	Dec 2025	V1.4	Updated following the review by NSPCC

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1 Introduction

1.1 Denbighshire Leisure Ltd recognises its obligations to safeguard children and adults, and takes the work extremely seriously.

1.2 Safeguarding is everyone's business, and all Denbighshire Leisure employees are required to work in accordance with the organisation's Safeguarding policies and procedures. All staff have a duty to report any concerns which may be noted during the course of their duties and are asked to be alert to the signs of exploitation and abuse.

1.3 Denbighshire Leisure Ltd. also recognises the diversity of children and adults and the additional barriers some may face. Further information can be found in the following policies and guidance –

[DLL Membership Terms and Conditions](#)

[DLL Trans Equality Policy](#)

[DLL Domestic Abuse policy](#)

1.4 **The three pillars of Denbighshire Leisure Ltd:**

– **Our Community**

Within the wider Denbighshire area, our teams work with a network of smaller communities consisting of customers, sports clubs, local groups and residents. We place these communities at the heart of everything we do.

– **Our People**

We believe that our staff are a vital element of Denbighshire Leisure's success. We value the skills and experience each individual brings to their role and although the Company offers a diverse range of services, our teams all have the same qualities in common – they are passionate and driven, with a culture of high performance and a reputation for excellent customer service.

– **Our Business**

Denbighshire Leisure Ltd is a new Company, built from a history of high performance and innovative practice. Over recent years, as a service within Denbighshire County Council, we have built lasting and mutually beneficial relationships with a number of partner organisations. We are looking forward to the continued success of these established partnerships, whilst also developing new and exciting ventures. Within all of our relationships, we are committed to acting with integrity, transparency and courtesy.

2 Safeguarding

2.1 “Safeguarding” is a wider concept than the protection of children and adults and deals with the promoting of:

- physical, emotional and mental
- protection from harm and neglect;
- education, training and leisure;
- contribution to society;
- social and economic well-being.

2.2 The following is a list of the types of abuse and neglect that can occur -

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

The Wales Safeguarding Procedures website lists specific guidance on the types of abuse listed above. Further information can be found here -

[All Wales Practice Guides](#)

Further information on the standard definitions as used by Safeguarding Wales can be found here -

[Key definitions relevant to safeguarding children](#)

[Definitions of Adults at risk of abuse and neglect](#)

3 Purpose

- 3.1 The purpose of this document is to ensure Denbighshire Leisure Limited has in place sufficient guidance and information to make staff aware of safeguarding responsibilities in their own area of work and the process for reporting of any potential safeguarding issues in compliance with the Company's Policy and Guidelines and Procedures for Safeguarding both Children and Adults and that the company is adhering to national guidelines and legislation relating to Safeguarding, including the following -

[Social Services and Wellbeing \(Wales\) Act 2024](#)

[Working Together to Safeguard People \(2022\)](#)

[Wales Safeguarding Procedures](#)

[Children Act \(1989\)](#)

[UN Convention on the Rights of the Child \(1989\)](#)

- 3.2 Safeguarding Children, Young People and Adults at Risk is a key priority for Denbighshire Leisure Limited, and to support this a Safeguarding and Volunteering Group has been established to manage safeguarding risk and compliance on behalf of the Company's Managing Director. The group will plan, implement, monitor, review and improve safeguarding arrangements across Denbighshire Leisure.

4 Designated Safeguarding Manager & Safeguarding and Volunteering Group

- 4.1 The company is required to have a designated manager for dealing with Safeguarding issue and concerns. The manager will act as a key source of advice and support for staff within the company for all safeguarding matters.
- 4.2 In addition to this, there are Designated Service Safeguarding Representatives for each area of Denbighshire Leisure Limited. They form the DLL Safeguarding and Volunteering Group, who meet on a bi-monthly basis – and are noted below:

Name	Role on group	Title	Phone Number
Ian Olson	Chair, Designated Safeguarding Manager (DSM) and representative from Leisure	Leisure Operations Manager Cluster 2	01824 774829
Sian Bennett	Deputy Chair	Head of Active Communities	01824 774810
Andy Moreland	Company Secretary	Head of Governance	01824 774858
Dafydd Howatson	Representative from Food and Beverage	Group Food & Beverage Operations Manager	01824 774827
Brett Jones	Lead Safeguarding Trainer	Community Health Manager	01824 774802
Sian Davies	Representative from Rhyl Pavilion	County Events Manager	01824 774839
Graham Evans	Representative from Facilities Team	Programme Manager – Facility Development	01824 774818
Nicola James	Secretary	Business Support Assistant	01824 774857

- 4.3 The role of the DSM is to

Take the lead in ensuring that appropriate arrangements for keeping children, young people and adults safe are in place at DLL

To promote the safety and welfare of children, young people and adults involved in DLL activities at all times.

5 Concerns

- 5.1 Any staff member who has a general concern should discuss this with their line manager in the first instance who will then contact the designated safeguarding representative for their service. This could include online, or historical abuse.
- 5.2 Concerns about School Pupils/School Staff during school time, staff should contact the Designated Safeguarding Manager who will contact the Designated School Safeguarding Manager.
- 5.3 DLL takes reports of historic/non-recent abuse seriously and is committed to co-operating with any investigations.

When receiving information about historical abuse all staff and volunteers should seek to obtain, where possible the following:

- Name and contact details of the person making the allegation. If a member of the public wishes to remain anonymous this should be respected
- Name of the individual who the allegation is about and any other identifying information, including location
- Name of any children involved or who may have contact with the alleged perpetrator
- Date and time of when the abuse occurred
- Key information about the nature of the historical abuse allegation
- Establish, where possible, if the alleged perpetrator is still working with or caring for children
- Establish whether other agencies are involved
- Then follow the usual reporting procedures as listed in section 6.

The NCPCC helpline is 0808 800 5000, if further advice is required.

- 5.4 If there is a disagreement between staff on what the course of action should be or a disagreement on a decision, the DSM should be involved and should refer to the [North Wales Protocol for the Resolution of Professional Disputes](#)
- 5.5 DLL recognises that talking to a young person who has disclosed abuse and talking to parents and carers about the concerns involving their child is not easy. Advice on this can be sought from the Designated Safeguarding Manager or member of the Safeguarding group. Further information can also be found on the NSPCC website – [Recognising and responding to abuse](#)

Further information on managing concerns made by members of the public can be found [here](#).

6 Process

6.1 Concerns Raised – Monitor

- 6.1.1 Contact your Denbighshire Leisure Safeguarding Representative
- 6.1.2 Safeguarding Representative discusses with Designated Safeguarding Manager
- 6.1.3 Concerns logged on a Professional Involvement Record which is then stored on the DLL Safeguarding drive, with access only given to members of the Safeguarding Group

NOTE – details can be added to a Professional Involvement Record (PIR), as and when needed.

A copy of the PIR can be found [here](#)

Concerns Raised – Refer

- 6.1.4 Safeguarding Representative discusses with Designated Safeguarding Manager
- 6.1.5 Logged via DLL Safeguarding Refer Process (see below)

6.2 Immediate Disclosure Referral:

- 6.2.1 Any member of staff with reportable or immediate concerns regarding the safety of an individual, should contact the appropriate services immediately, if staff are unsure of what they should do, then they should contact a Denbighshire Leisure Safeguarding representative who can advise.
- 6.2.2 If appropriate they will then escalate this to a Denbighshire Leisure Designated Safeguarding Manager, and if they are unavailable, then the matter must be referred to SPOA (Single Point of Access for Adults) 0300 456 1000 or The Children's Gateway 01824 712200 (for Children and Young People) immediately. It is crucial not to delay this process.
- 6.2.3 If the issue arises after 5.00pm, Monday to Friday and on weekends and Bank Holidays, the Social Services Out-of-Hours Team should be contacted on 0345 053 3116.

6.3 The Police must be contacted immediately if the child or adult is in danger.

6.4 Manager to hold a brief with staff member involved in incident, to safeguard the employee's wellbeing, providing support as necessary

6.5 Managing allegations against staff and volunteers

- 6.5.1 Any member of staff with reportable or immediate concerns regarding the behaviour of a colleague towards children or an adult should contact the appropriate

services immediately, if staff are unsure of what they should do, then they should contact a DLL Safeguarding representative who can advise.

6.5.2 If allegations are made against the Designated Safeguarding Manager, the individual should refer their concerns directly to Jamie Groves, Managing Director, DLL (Jamie.groves@dll.co.uk or 07891 097951)

6.5.3 The North Wales Safeguarding Board Practice Guide - [Safeguarding allegations/concerns about Practitioners and those in a position of trust](#) should be followed in this case. Managing cases under this guidance applies to a wider range of allegations than those in which there is reasonable cause to believe a child or adult at risk is suffering or is likely to suffer harm. It also applies to concerns that might indicate that a person is unsuitable to work with children and adults at risk in their present position or in any capacity. Information relating to these matters will be stored on a secure drive and the [DLL Privacy Policy](#) will be adhered to.

6.5.4 Any referral to the Disclosure and Barring Service (DBS) will be made by the DSM.

6.5.5 If you have raised a concern and are not happy with the response of the organisation you can call the NSPCC Whistleblowing helpline on 0800 028 0285 or refer to the [Whistleblowing policy](#)

7 Responsibility of Managing Director

- 7.1 The Managing Director must establish arrangements to ensure the company complies with the requirements of this policy and the Company's Safer Recruitment Policy.
- 7.2 The Managing Director must ensure that records are kept of every check that is made by the Disclosure and Barring Service. For DLL, this will be monitored by our Safeguarding and Volunteering Group, who in turn report back to the Executive Team.

8 Responsibility of Senior Managers

- 8.1 It is the responsibility of all Senior Managers to ensure that;
 - 8.1.1 Staff are appropriately checked through the Disclosure and Barring Service procedures and records are appropriately kept and maintained. Further information can be found in our Safer Recruitment Policy
 - 8.1.2 Mandatory Safeguarding awareness training is included in the departmental induction process for all new starters within the service, this needs to be completed prior to attending any additional training.
 - 8.1.3 This guidance should be included within the induction process for staff. Staff must confirm that they have read, understood and conform to this policy document
 - 8.1.4 Ensure that Safeguarding is a standing agenda item on team meetings

9 Responsibility of staff

- 9.1 Every member of staff and all volunteers are responsible for undertaking their duties in a manner which safeguards and promotes the welfare of children and adults.
- 9.2 They must also act in a way which protects them against false allegations of abuse as far as possible and in accordance with this policy.
- 9.3 They must bring issues of concern regarding the safety and welfare of children and adults to the attention of their Line Manager or Safeguarding Representative.

10 Organisations using our facilities

- 10.1 As part of our responsibilities in relation to Safeguarding, we require all clubs and organisations who hire our facilities, to complete a safeguarding form. The form covers safeguarding requirements and is particularly applicable to those who coach / teach / instruct persons under the age of 18 years.
- 10.2 The following information must be confirmed at the time of booking, and copies may be requested as part of DLL's audit processes:
- 10.2.1 Public liability insurance provider and policy number (min £5 million)
 - 10.2.2 Confirmation that a Risk Assessment is in place
 - 10.2.3 Confirmation that an Operating Procedure and Emergency Action Plan is in place
 - 10.2.4 DBS certificate numbers must be provided for all sessions where coaching, teaching or instructing of under 18s takes place
 - 10.2.5 Confirmation that all coaches have the relevant Coaching Qualifications
- 10.3 Bookings are not accepted unless the safeguarding form is returned.

11 Contractors

- 11.1 Contractors, sub-contractors or other organisations funded by or on behalf of Denbighshire Leisure and/or Denbighshire County Council are responsible for arranging checks (where appropriate) through the Disclosure and Barring Service and the Independent Safeguarding Authority and for ensuring that their staff comply with regulatory and contractual arrangements relating to safeguarding children and adults. A section on Safeguarding must be included in all external contracts.
- 11.2 This should highlight the requirements of Denbighshire Leisure's Safeguarding Policy and Guidelines, and any monitoring of safeguarding arrangements and reporting outcomes, as part of contract monitoring arrangements. Contractors are also responsible for informing relevant managers within the Company about any concerns they may have and to refer concerns.

12 Safeguarding Training

- 12.1 All DLL Staff will be required to complete the mandatory online safeguarding awareness training as part of their induction process and refreshed every 3 years. It is the manager's responsibility to ensure this is completed.
- 12.2 Further Level 2 Safeguarding training is also provided in house by Denbighshire Leisure. Staff who work closely with children and/or vulnerable adults on a daily basis must complete this face to face training every 3 years.
- 12.3 The Designated Safeguarding Leads (DSLs) and members of the Safeguarding group who deliver the Level 2 training, will complete a Level 3 safeguarding course.

13 Reporting, Monitoring and Reviewing

- 13.1 The Denbighshire Leisure Safeguarding and Volunteering Group will be responsible for collating the Company data and reporting in accordance with the Company's Safeguarding Policy and Guidelines.
- 13.2 The indicators that will be reported are;
- % of staff commencing in post with reference/s and a DBS check
 - % of staff who have completed mandatory corporate safeguarding training
- 13.3 Further measures for good safeguarding practise will be developed.
- 13.4 The Denbighshire Leisure Safeguarding Policy will be reviewed annually by the Safeguarding and Volunteering Group.
- 13.5 Spot Checks on the information supplied are undertaken by the Safeguarding and Volunteering Group on a bi-monthly basis and reported back for compliance.

14 Recording and information sharing procedures

14.1 DLL follows guidance that the Information Commissioners Office has developed on data protection considerations when sharing personal information for child safeguarding purposes.

14.1.2. Data protection law allows you to share information when required to identify children at risk of harm and to safeguard them from harm. Data protection law doesn't prevent you from doing this. It simply helps you to share information in a fair, proportionate and lawful way. It can be more harmful not to share information that is needed to protect a child or young person. Appropriate information sharing is central to effectively safeguarding children from harm and promoting their wellbeing.

14.1.3. Further information can be found on the Information Commissioners Office website

14.1.4. DLL's privacy policy is available on our [website](#)

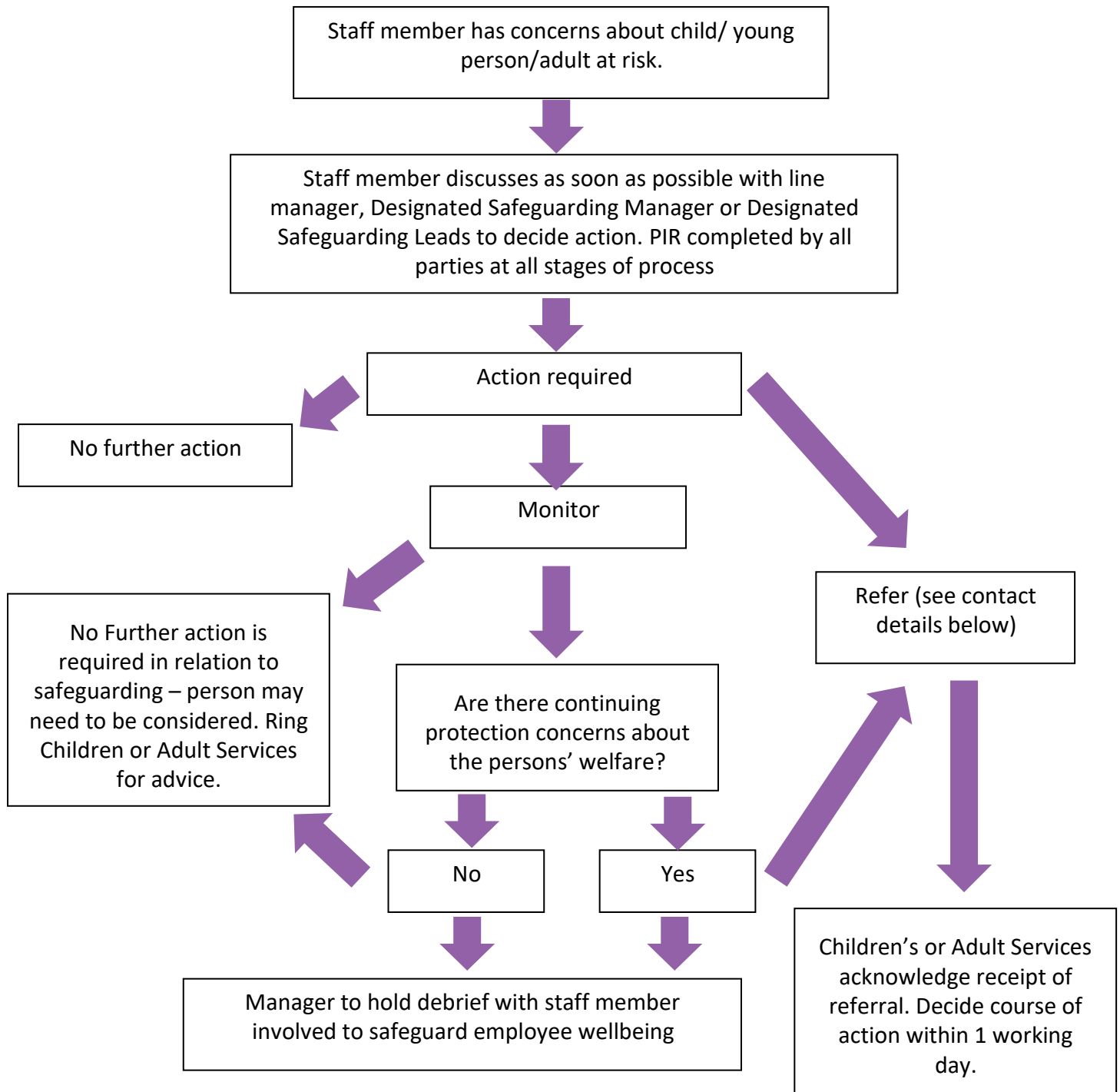
14.1.5 In relation to the storage of information Professional Involvement Records, these forms are saved within individual folders on the DLL Safeguarding Drive, with only members of the Safeguarding group having access to them. Access to drives are reviewed every 6 months to ensure they the correct people have access to them.

14.1.6 Any information on children is held until their 25th birthday.

14.1.7 Records relating to concerns about an adult's behaviour are kept in the person's confidential personnel file and a copy is given to the individual. Files relating to concerns about an adult's behaviour around children are kept for 10 years. This applies to volunteers and paid staff. Records are kept for the same amount of time regardless of whether the allegations were unfounded. If we find that allegations are false, we would destroy the record immediately.

Further information on the storage of records can be found here [NSPCC Child protection records retention and storage guidelines](#)

15 DLL Safeguarding Referral process



For Children / Young People report to:

- 01824 712200– Monday to Thursday 9am – 5pm, Friday 9am – 4:30pm
- 0345 053 3116 – Evenings and weekends
- Email cfsgateway@denbighshire.gov.uk.

SPOA (Single Point of Access for Adults) report to:

- 0300 4561000 - Monday to Thursday 9am – 5pm, Friday 9am – 4:30pm
- 0345 053 3116 – Evenings and weekends
- Complete online form via DCC website