

## GOOD PRACTICE IN SHARING INFORMATION

Some information that may need to be shared regarding a concern for the well-being of a young person may be personal and/or sensitive.

The following principles are good practice in how this information is shared:

### GOLDEN RULES OF SHARING SENSITIVE INFORMATION<sup>1</sup>

1. The Data Protection Act is not a barrier to sharing information, it provides a framework to ensure personal information is shared appropriately.
2. Be open and honest with the young person (and / or their family where appropriate) about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice if you are in any doubt. Advice could come from England Hockey Ethics and Compliance Manager, NSPCC, Local Authority Children's Social Care Dept (Social Services) or the Police. It may be possible to gain the advice without disclosing the identity of the young person.
4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgment, that lack of consent can be overridden in the interest of the young person. You will need to base your decision on the facts of the situation.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the young person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, share only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. (Inform the England Hockey Ethics and Compliance Manager of your actions).

## CONFIDENTIALITY

- Every effort must be made to ensure that confidentiality is maintained when an allegation has been made and is being investigated.
- Only tell individuals who need to know and can help to manage the concern.

Confidentiality is essential and if maintained will ensure:

- the safety of the young person involved
- that action is taken to protect the young person
- that individuals involved in any complaint are protected from gossip and assumptions
- that individuals who have a complaint against them receive fair treatment, without prejudice or pre-judgment
- that all policies, procedures and systems can work to manage any situation quickly, professionally and effectively.

## IMPACT IF CONFIDENTIALITY IS BREACHED

If confidentiality is breached the following can happen:

- the young person is put in danger either by further inappropriate action of any adult involved or other individuals who hear about any concern through rumours through lack of action
- any investigation by either England Hockey or the statutory agencies may be invalidated by misinformation or rumours
- individuals with a complaint against them may be victims of inappropriate behaviour from club members
- the policies, procedures and systems in place will not support or uphold any complaint or concern.

*“I trust the coaches and helpers and I know I can go straight to them with a problem.”*



## WHISTLE BLOWING POLICY

If there is a concern with regard to the behaviour of an adult towards a young person, it is important that you share your concerns with the England Hockey Ethics and Compliance Manager.

All information received and discussed will be treated in confidence and only shared with those individuals within England Hockey who will be able to manage and resolve the situation. On occasion it may be necessary to seek advice, or inform the statutory agencies e.g. Children's Social Care or the Police. All concerns will be taken seriously and managed according to the England Hockey Safeguarding Young People Policies and Procedures.

## GENERAL PRINCIPLES

A member of the Hockey Family is often the first to realise that a young person's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation. In these circumstances it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice.

England Hockey is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, individuals are encouraged, if they have serious concerns about any aspect of a young person's safety and welfare, to come forward and voice those concerns.

This policy makes it clear that individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within England Hockey rather than overlooking a problem or blowing the whistle outside.

It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly. This includes the interests of England Hockey, its employees, all persons registered as members of England Hockey and any persons who are the subject of any complaint, as well as the person making the complaint.

## SAFEGUARDS

England Hockey is committed to good practice and high standards and wants to be supportive of everyone within the Hockey Family.

England Hockey recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged poor practice. If an individual believes what they are saying to be true, they should have nothing to fear, because in reporting their concern they will be doing their duty to the young person concerned.

England Hockey will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect individuals when they raise a concern in good faith.

Any investigation into allegations of poor practice will not influence or be influenced by any disciplinary procedures that already affect individuals unless there may be a pattern of poor practice/abuse which requires the cases to be linked /dealt with together.

## CONFIDENTIALITY

England Hockey will do its best to protect the identity of the whistleblower when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by the whistleblower may be required as part of the evidence. They will be given prior notice of this and a chance to discuss the consequences.



## ANONYMOUS ALLEGATIONS

This policy encourages the whistleblower to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered (at the discretion of the England Hockey Case Management Group).

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources or factual records.

## UNFOUNDED ALLEGATIONS:

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, it is established that they have made malicious or frivolous allegations, or for personal gain, disciplinary action may be taken against them. In such cases, England Hockey's disciplinary procedure will apply.

## USE OF THE WHISTLE BLOWING POLICY

The whistle blowing policy should only be followed if the person raising the concern feels unable to follow the standard reporting procedures as set out in England Hockey's Safeguarding and Protecting Young People in Hockey Policy and Procedures.



## HOW TO RAISE A CONCERN

Individuals should raise the concern in the first instance with the England Hockey Ethics and Compliance Manager

on 01628 897500

or by post to England Hockey,  
Bisham Abbey National  
Sports Centre, Marlow,  
Buckinghamshire, SL7 1RR  
(you should mark the envelope  
'private & confidential');

or email

[safeguarding@englandhockey.co.uk](mailto:safeguarding@englandhockey.co.uk)

If you believe that you have not received a satisfactory response to your concern, you should contact the Finance and Administration Director.

Concerns may be made verbally or in writing to the England Hockey Ethics and Compliance Manager (as above). The individual should set out the background and history of the concern, giving names, dates and places where possible and the reason why they are particularly concerned about the situation. The earlier the individual expresses concern, the easier it is for someone to take action.

Although the whistleblower is not expected to prove the truth of an allegation, they will need to demonstrate to the England Hockey Ethics and Compliance Manager that there are sufficient grounds for their concern.

If your concern is about the England Hockey Ethics and Compliance Manager, you should refer the matter to England Hockey's Finance and Administration Director.

**If you do not want, or feel unable, to report the matter to England Hockey, a number of external agencies are also available for reporting purposes. See 'Useful Contacts' document.**



## HOW WILL ENGLAND HOCKEY RESPOND?

**The action taken by England Hockey will depend on the nature of the concern. In all cases the matter will be referred to the England Hockey Case Management Group.**

In order to protect individuals it is likely that the England Hockey Ethics and Compliance Manager will conduct initial enquiries so that the Case Management Group can decide whether an investigation is appropriate and, if so, what form it should take.

The amount of contact between the people considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the whistleblower as part of the investigation process.

When any meeting is arranged, the whistleblower has the right, if they so wish, to be accompanied by a friend or a person of their choice who is not involved in the matter to which the concern relates.

England Hockey will take steps to minimise any difficulties which individuals may experience as a result of raising a concern. For instance, if the whistleblower is required to give evidence in criminal or disciplinary proceedings, England Hockey will advise them about the procedure.

England Hockey accepts that the whistleblower needs to be assured that the matter has been properly addressed. Subject to legal constraints, they will receive information about the outcome of any investigation, and the action that is to be taken against those whose actions caused them concern. Also, if appropriate, what policy changes are to be made to minimise the possibility of a similar concern being raised in the future.

## HOW CAN THE MATTER BE TAKEN FURTHER?

This policy is intended to provide individuals with a way in which they can raise concerns about the safety and welfare of any young person involved in any hockey activity under the jurisdiction of England Hockey. England Hockey hopes individuals will be satisfied that any child protection matter they raise has been considered properly. If they are not satisfied, and if they feel it is right to take the matter outside England Hockey, they should contact:

- their Local Safeguarding Children's Board (LSCB)
- their local Children's Social Care Dept (Social Services)
- their local police

If they do take the matter outside England Hockey, they will need to ensure that they do not disclose prohibited confidential information. They must check this before they make contact.

## ENGLAND HOCKEY COMPLAINTS PROCEDURE

**What to do if you have a complaint about the way England Hockey has dealt with a Safeguarding Young People or Child Protection issue.**

England Hockey is committed to providing high levels of customer satisfaction. If you are not satisfied with the way England Hockey have handled a Safeguarding or Protecting Young People issue, please refer to the final section of the Safeguarding Young People in Hockey Complaints and Disciplinary Regulations.