



# Safeguarding Policy

## **Introduction**

The paragraphs below set out the legal framework for the role of Dragon Football Academy in relation to Safeguarding. Section 175 of the Education Act 2002 requires further education institutions to make arrangements to ensure that the functions are carried out with a view to safeguarding the welfare of children and vulnerable adults.

Working Together to Safeguard Child/Young Person (2006) provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children and young people.

Safeguarding Children Education (September 2009) provides guidance on the duties of FE institutions with respect to having arrangements in place to safeguard and promote the welfare of children / young people and vulnerable adults.

The Mental Capacity Act (MCA) 2005 applies to everyone involved in the care, treatment and support of people aged 16 and over living in England and Wales who are unable to make all or some decisions for themselves. The MCA is designed to protect and restore power to those vulnerable people who lack capacity.

## **General Policy**

Dragon Football Academy recognises that it has a duty to safeguard and promote the welfare of all learners. We recognise that we have a legal duty to ensure that it takes action to safeguard and promote the welfare of all learners at this training centre and in the workplace. There is a designated member of the management team with specific responsibility for all safeguarding issues who is trained to follow up of any allegations.

We will keep a log of all allegations where they may be any concerns that a child or young person has been abused or might be at risk of significant harm an immediate referral will be made to the appropriate agencies ie Social service and/or the police.

It is recognised that some adults are also vulnerable to abuse accordingly the procedures may be applied (with adaptations) to allegations of abuse and the protection of vulnerable adults.

## **Duty to Report**

All members of staff at Dragon Football Academy, including full-time, part-time and associate staff are responsible for safeguarding and promoting the welfare of children and vulnerable adults.

All Staff:

All staff who have come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote the welfare of children and vulnerable adults. Staff will be trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. Staff are expected to:

- Attend safeguarding training as required
- Familiarise themselves with the Safeguarding Policy and associated procedures
- Safeguard and promote the welfare of children and vulnerable adults and
- Alert the safeguarding officer if they have concerns about a child or vulnerable adult

If an apprentice discloses to you that they (or indeed another child/young person or vulnerable adult) have been, or abused/radicalised:

### **DO**

- **Do** listen very carefully to what they tell you
- **Do** take what is said seriously and accept what you are told
- **Do** stay calm and reassure the student that they have done the right thing
- **Do** write down as soon as you can exactly what you have been told
- **Do** tell them that you must pass this information on but only those that need to know will be told. Tell them to whom to report the matter.

### **DO NOT**

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child/young person or vulnerable adult who is at risk
- **Do not** lie or say that everything will be fine now that they have been told.
- **Do not** criticise the abuser, especially if it is a parent/carer.
- **Do not** ask lots of detailed or leading questions such as: 'What did he/she do next?' instead, ask open questions such as: 'Anything else to tell me?', 'Yes', or 'And....?'
- **Do not** press for answers the student is unwilling to give.
- It is important that the person to whom the disclosure is made does not investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.
- It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. Clearly all written records should be handled confidentially. The safeguarding referral form should be used in all cases.
- If a child/young person or vulnerable adult discloses to you that they or another child have been abused/radicalised, or if you suspect from what you observe that they are being abused, you **MUST REPORT THIS**.

## **The Senior Management Team**

The Managing Director and Senior Management Team are responsible for ensuring that:

- Dragon Football Academy Ltd Safeguarding Policy and Procedure are fully implemented and followed by staff.
  - The Safeguarding officer has sufficient time and resources to carry out their roles
  - All staff feel able to raise concerns about the safety of children and vulnerable adults
- Concerns are dealt with sensitively, effectively and in a timely manner

The four key categories of abuse are:-

### **Physical Abuse**

Physical abuse may involve hitting shaking throwing, poisoning, burning or scalding drowning suffocating or otherwise causing physical harm or deliberately induces illness.

### **Possible Signs of Physical Abuse**

Include:

- \* Unexplained injuries or burns, particularly if they are recurrent
- \* Refusal to discuss injuries
- \* Improbable explanations for injuries
- \* Untreated injuries or lingering illness not attended to
- \* Admission of punishment which appears excessive
- \* Shrinking from physical contact
- \* Fear of returning home or of parents being contacted
- \* Fear of undressing
- \* Fear of medical help
- \* Aggression/Bullying
- \* Over compliant behaviour or a 'watchful' attitude
- \* Running away
- \* Significant change in behaviour without explanation
- \* Deterioration of work
- \* Unexplained pattern of absence which may service to hide bruises or other physical injuries

### **Neglect**

Neglect is the persistent failure to meet a young person's basic physical and / or psychological needs likely to result in the serious impairment of their health or development. It may involve a parent/carer

- Failing to provide adequate food and clothing and shelter including exclusion from home or abandonment
- Failing to protect a child or young person from physical harm or danger
- Failing to ensure adequate supervision
- Failing to ensure access to appropriate medical care or treatment
- It may also include neglect to a child or young person's basic emotional needs.

### **Possible signs of neglect:**

Include:

- \* Constant hunger
- \* Poor personal hygiene
- \* Inappropriate clothing
- \* Frequent lateness or non-attendance at college

- \* Untreated medical problems
- \* Low self-esteem
- \* Poor social relationships
- \* Compulsive stealing or scrounging
- \* Constant tiredness

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child/young people to take part in sexual activities including prostitution whether or not the child/young person is aware of what is happening. The activities may involve physical contact including penetrative acts or non-penetrative acts. They may include non-contact activities such as involving a child/young person looking at or in the production of sexual online material, watching sexual activities or encouraging others to behave in sexually inappropriately ways.

### **Possible Signs of Sexual Abuse**

Include:

- \* Bruises, scratches, burns or bite marks on the body
- \* Scratches, abrasions or persistent infections in the anal or genital regions
- \* Sexual awareness inappropriate to the person's age – shown for example, in drawings, vocabulary, games and so on.
- \* Frequent public masturbation
- \* Attempts to teach others about sexual activity
- \* Refusing to stay with certain people or to go to certain places
- \* Aggressiveness, anger, anxiety, tearfulness
- \* Withdrawal from friends
- \* Promiscuity, prostitution, provocative sexual behaviour
- \* Self-injury, self-destructive behaviour, suicide attempts
- \* Pregnancy – particularly in the case of young adolescents who are evasive concerning the identify of the father
- \* Recoiling from physical contact
- \* Eating disorders
- \* Tiredness, lethargy, listlessness
- \* Over-compliant behaviour
- \* Genital discharge/irritation
- \* Sleep disturbance
- \* Unexplained gifts of money
- \* Depression
- \* Changes in behaviour

### **Emotional Abuse**

Emotional abuse is the persistent emotional mal-treatment of a child/young person such as to cause severe and persistent adverse effects on their emotional development. It may involve: · Conveying to child or young person that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. · Age or developmentally inappropriate expectations being imposed on child or young person. These may include interactions that are beyond the child or young person's developmental capabilities, as well as overprotection and limitation of exploration

and learning or preventing the child or young person participating in normal social interaction. · Serious bullying, causing a child or young person frequently to feel frightened or in danger · The exploitation or corruption of a child or young person. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone The Management are committed to ensure that they:-

- Raise awareness of issues relating to safeguarding and promoting the welfare of young learners Provide a safe learning environment
- Identify learners who are suffering or at risk of suffering significant harm and takes appropriate action to ensure that all learners are kept safe
- Have procedures for reporting and dealing with allegations of abuse against members of staff and volunteers
- Operates safe recruitment procedures
- This policy is to be reviewed annually.

### **Possible Signs of Emotional Abuse**

Include:

- \* Continual self-deprecation
- \* Fear of new situations
- \* Inappropriate emotional responses to painful situations
- \* Self-harm or mutilation
- \* Compulsive stealing/scrounging
- \* Drug/solvent abuse
- \* 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on
- \* Air of detachment – 'don't care' attitude
- \* Social Isolation – does not join in and has few friends
- \* Desperate attention-seeking behaviour
- \* Eating problems, including over-eating and lack of appetite
- \* Depression, withdrawal

### **Possible signs of financial abuse:**

Include:

- \* Loss of jewellery and personal property
- \* A bill not being paid when is entrusted to a third party
- \* Unexplained withdrawal of cash
- \* Lack of money to purchase basic items
- \* Misuse of benefits
- \* Inadequate clothing
- \* Theft of property
- \* Over protection of money or property
- \* Loss of money from a wallet or purse

### **Possible signs of Radicalisation:**

Include:

- \* The individual's views become increasingly extreme regarding another section of society or government policy
- \* The individual becomes increasingly intolerant of more moderate views
- \* The individual expresses a desire/intent to take part in or support extremist activity
- \* They are observed downloading, Viewing or sharing extremist propaganda from the web

- \* They become withdrawn and focused on one ideology
- \* The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

#### Possible signs of Domestic Violence

- \* The Partner Exerts A Large Amount Of Control.
- \* The Partner Engages In Emotional And Verbal Abuse.
- \* The Abused Partner Feels Trapped And Unhappy.
- \* The Partner Shows A Lack Of Respect For You.
- \* The Abused Partner Gets Visible Injuries.

#### Possible signs of Modern Slavery

- \* Signs of physical or emotional abuse
- \* Appearing to be malnourished, unkempt or withdrawn
- \* Isolation from the community, seeming under the control or influence of others
- \* Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- \* Lack of personal effects or identification documents
- \* Always wearing the same clothes

#### Possible signs of Discrimination

- \* Low Employee Morale. An overall company culture of low morale could mean there is discrimination going on. ...
- \* Money Matters. A company's bottom line is affected by discrimination because unhappy clients might take their business elsewhere if arguing or missed deadlines are the norm.
- \* High Turnover. Sometimes companies lose an upset employee or several unfulfilled employees at once due to discrimination.

#### Organisational discrimination

- \* **Lack of Diversity:**  
Some signs of discrimination are more noticeable than others. If everyone in your workplace is the same, race, gender, age, or sexual orientation then the environment can be ripe for workplace discrimination. This even extends to accommodating disabilities in the workplace.
- \* **Fixed Roles:**  
If the men in the workplace are all in managerial positions while the women remain in secretarial roles this could be a sign of discrimination. Especially if the women have qualifications for a higher role but are never promoted.
- \* **Overlooked or Denied Promotions:**  
If you have been working hard and have the skills to fill a new role but are consistently passed over then this could be workplace discrimination. Especially, if you express interest in or apply for a new position but instead someone that is less qualified receives the promotion.
- \* **Demeaning and Alienating Communication:**  
Communication can be a big factor in employment discrimination. The tone and manner in which co-workers and supervisors speak to each other can be

unpleasant and open up grounds for discrimination. Discrimination can be present if you are consistently spoken to in a harsh or belittling tone, or if offensive jokes and comments are made, especially in reference to race, gender, religion, age or sexual orientation.

- \* **Negative Increase or Decrease of Workload:**  
Common discriminatory tactics by managers includes taking away key responsibilities for the employee, or giving a targeted employee impossible tasks to successfully complete. This is usually a manager trying to build a case to have an employee terminated.
- \* **Bogus Discipline:**  
As part of their discriminatory tactics, managers may begin unjustly criticizing an employee's work or disciplining them unfairly in an attempt to create a paper trail for termination.

#### WHAT IS A VULNERABLE ADULT?

The Department of Health defines a vulnerable adult as a person who is aged 18 or over that is or may need community care services because of a disability (mental or other), age or illness and is someone who could be unable to look after themselves, or protect themselves from harm or exploitation.

It's important to ask for help as soon as you notice the signs of maltreatment, which includes:

- \* **Physical** – being hit, slapped, pushed or restrained that results in burns, cuts, black eyes and internal injuries
- \* **Verbal** – being humiliated, isolated, controlled and harassed is a kind of abuse that affects the emotional health of a vulnerable adult
- \* **Sexual** – sexual abuse includes indecent exposure, sexual harassment and rape
- \* **Financial** – stealing money from a vulnerable adult or using their money inappropriately
- \* **Self Abuse** – not providing them with enough food and the right medicines, not helping them wash and change their clothes

#### WHO IS A VULNERABLE ADULT?

- \* Someone who is diagnosed to be mentally and/or physically ill
- \* Someone who has mental health needs such as dementia or down syndrome
- \* Someone who is unable to report abuse and make a decision for him/herself
- \* Someone who is old and frail due to physical disability

The designated member of staff with lead responsibility for safeguarding issues is Paul Dawson and the Deputy is David Cashman. She has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the promotion of a safe learning environment.

She has received training in safeguarding, as a DSO and Safeguarding Supervision Training, HR have been trained in the safe recruitment processes and will undertake refresher training at least every two years he will keep up to date with developments in safeguarding issues.

The staff member with lead responsibility is responsible for overseeing the referral of cases of suspected abuse or allegations · Providing advice and support to other staff on issues relating to safeguarding · Maintaining a proper record of any safeguarding referral, complaint or concern (even where the concern does not lead to a referral) · Liaising with agencies as appropriate · Ensuring that staff receive basic training in safeguarding issues and are aware of the company's safeguarding procedures.

### **All staff**

All staff will receive training adequate to familiarise them with safeguarding issues and responsibilities with refresher training at least every three years.

### **Dealing with Disclosure of Abuse and Reporting Concerns**

Sometimes a member of staff may have suspicions that a learner is being abused or is at risk of significant harm. A learner may also disclose to a member of staff that s/he is being abused. In these circumstances, the procedure outlined below should be followed:

#### **Significant Concerns:**

If a member of staff has significant concerns about a young person, but does not believe that they are being abused or are at risk of immediate significant harm he/she should: · Talk to the person about the concerns · Speak to the Designated Officer, who will consider and advise whether the concerns should be formally registered by the company.

#### **Disclosure of Abuse:**

If a person discloses abuse, or if abuse is suspected, staff should: · Listen carefully and stay calm · Question normally and without pressure, in order to be sure that what the young person is saying is fully understood by the member of staff. · Reassure the young person that by telling a member of staff, they have done the right thing. · Inform the young person that the information must be passed on, but that only those who need to know about it will be told. Inform the young person to whom the matter will be reported. · Note the main points carefully. · Make a detailed note of the date, time, place, what the person said, did and the questions asked by the member of staff.

#### **Staff should not: ·**

Put words into the young person's mouth or ask leading questions · Investigate concerns or allegations, but should report them immediately to the Designated staff member · Promise confidentiality

## **Reporting to Designated Staff**

Staff should report any concerns, suspicions or disclosures of abuse immediately to the designated officer – Ellen Jones – Ellen.jones@dragonfootballacademy.com. The designated member of staff must report the matter to Social Care or to the Police immediately by telephone and follow this up in writing within 48 hrs. A written record of the date and time of the report should be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing, using the appropriate referral form where possible, to Social Care within 24hours.

## **Whistle Blowing**

Whistleblowing can be defined as the disclosure of confidential information which relates to malpractice, fraud, or other illegal or unethical conduct connected with the workplace. This extends to allegations of suspected fraud; malpractice; financial irregularity; corruption; bribery; dishonesty; criminal activities; miscarriage of justice; breach of any code of ethics or ignoring a serious risk to health and safety or the environment. For full details please refer to the whistle blowing policy.

## **Written Records**

The designated member of staff shall retain a copy of:

- The report
- Any notes or correspondence dealing with the matter
- Any other relevant material

Copies of reports, notes etc will be held centrally that will ensure these are maintained securely locked at all times. Access to records will be confined to designated staff. No information should be held on a learner's records / file within curriculum areas

The framework for managing cases set out in this guidance applies to a wider range of allegations than those in which there is reasonable cause to believe a child / young person is suffering, or is likely to suffer, significant harm. It also caters for cases of allegations that might indicate that the alleged perpetrator is unsuitable to continue to work with child / young person in his or her present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a person who works with child / young person have:

- Behaved in a way that has harmed, or may have harmed, a child / young person
- Possibly committed a criminal offence against, or related to, a child / young person; or
- Behaved towards a child / young person in a way that indicates s/he is unsuitable to work with children / young people.

In consideration of an allegation against staff this may involve:

- a police investigation of a possible criminal offence
- enquiries and assessment by Social Care about whether a child / young person is in need of protection or in need of services
- Consideration by the company of disciplinary action in respect of the individual.

## **Resignations and 'compromise agreements'**

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare

of child or young person, including any in which the person concerned refuses to co-operate with the process. Wherever possible, the person should be given a full opportunity to answer the allegation and make representations about it. The process of recording and investigating the allegation and reaching a judgement about whether it can be regarded as substantiated should continue, even if that cannot be done or the person does not co-operate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

Compromise agreements – by which a person agrees to resign, the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference – must not be used in these cases. In any event, such an agreement will not prevent a thorough police investigation where appropriate, nor can it override an employer's statutory duty to make a referral to the Independent Safeguarding Authority where circumstances require that.

### **Record-keeping**

It is important that employers keep a clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved, and of any action taken and decisions reached. These should be kept in a person's confidential personnel file and a copy should be given to the individual. Such information should be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age, or for 10 years if that is longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future CRB Disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary reinvestigation if, as sometimes happens, allegations resurface after a period of time.

### **Timescales**

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Every effort should be made to manage cases to avoid any unnecessary delay although the time taken to investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness and complexity of the allegations.

### **Initial considerations**

Procedures need to be applied with common sense and judgement. Some allegations are so serious as to require immediate referral to Social Care and the police for investigation. Others are much less serious, and at first sight may not seem to warrant consideration of a police investigation or enquiries by children's Social Care. However, it is important to ensure that even apparently less serious allegations are seen to be followed up, and that they are examined objectively by someone independent of the organisation. The designated officer should first establish, in discussion with the employer, that the allegation is within the scope of safeguarding procedures and may have some foundation.

The employer should inform the accused person about the allegation as soon as possible. However, where a strategy discussion is needed, or it is clear that police or child / young person's Social Care may need to be involved, that should not be done until those agencies have been consulted and have agreed what information can be disclosed to the person. If the complaint or allegation is such that it is clear that investigations by police and/or enquiries by Social Care are not necessary, or the strategy discussion or initial evaluation decides that this is the case, the company should discuss next steps with the employer. In such circumstances, options open to the employer range from taking no further action, to summary dismissal or a decision not to use the person's services in future. The nature and circumstances of the allegation and the evidence and information available determine which of the range of possible options is most appropriate.

### **Monitoring progress**

The designated officer should regularly monitor the progress of cases, either via review strategy discussions, or by liaising with the police and/or Social Care colleagues or the employer, as appropriate. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case. If the strategy discussion or initial evaluation decides that a police investigation is required, the police should set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) to consider whether to charge the individual, continue to investigate, or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial action meeting. Dates for subsequent reviews, at fortnightly or monthly intervals should be set at the meeting if the investigation continues.

### **Information sharing**

In the initial consideration at a strategy discussion or joint evaluation, the agencies concerned – including the employer – should share all relevant information they have about the person who is the subject of the allegation and about the alleged victim. Wherever possible, the police should obtain consent from the individuals concerned to share the statements and evidence they obtain with the employer, and/or regulatory body, for disciplinary purposes. This should be done as the investigation proceeds rather than after it is concluded, to enable the police and CPS to share relevant information without delay at the conclusion of their investigation or any court case.

### **Action following a criminal investigation or a prosecution**

The police or the CPS should inform Dragon Football Academy and designated officer immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to prosecute after the person has been charged. Action by Dragon Football Academy, including dismissal, is not ruled out in any of those circumstances. The range of options open depends on the circumstances of the case, and the consideration needs to take into account the result of the police investigation or trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **Action on conclusion of a case**

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his/her services, the designated officer should discuss with the employer whether a referral to the Protection of Child Act List or DfES List 99 is required or advisable, along with the form and content of a referral. If it is decided on conclusion of the case that a person who has been suspended can return to work, the employer should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The employer should also consider how the person's contact with the child / young person who made the allegation can best be managed if they are still in the workplace.

### **Learning lessons**

At the conclusion of a case in which an allegation is substantiated, the employer should review the circumstances of the case to determine whether there are any improvements to be made to the organisation's procedures or practice to help prevent similar events in the future.

### **Action in respect of false or unfounded allegations**

If an allegation is determined to be unfounded, the employer should refer the matter to children's Social Care to determine whether the child / young person concerned is in need of services or may have been abused by someone else. In the rare event that an allegation is shown to have been deliberately invented or malicious, the police should be asked to consider whether any action might be appropriate against the person responsible.

### **Section (F) Recruitment and Selection Procedures**

Dragon Football Academy will have in place recruitment procedures which will ensure that every care is taken to ensure that young people are protected from unsuitable people. The recruitment procedures will apply to all staff and volunteers within the company who may work with young people. The recruitment procedures will include the following:

- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- The requirement to produce documentary evidence of academic/vocational qualifications.
- Obtaining professional and character references
- Verification of previous employment history
- Criminal Records Bureau disclosure/List 99 checks
- Use of a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

All Policy's are reviewed yearly, they will then be saved a newer version and the date this is done. This is logged onto a central spreadsheet where it is monitored to see when policy's need updating.

All Staff are required to complete mandatory training on Safeguarding at the start of their employment and every year after that, the update training is sent out to staff early and attendance certificates are to be sent to Head of Quality where this is monitored and stored onto a staff data base.

All staff are required to read all policy's at the start of their employment as part of their inductions, then are then required to sign the to say the have read each policy. If a policy is amended / updated all staff are informed and required to read and ensure they have understood the changes / updates.

All staff are required to adhere to the policy, this is monitored by management via OLTA's, 1:1's, Learner surveys.

As part of induction for Staff and learners, and throughout the year we ensure all staff and learners understand Safeguarding and what they should do should they have any concerns. This is monitored with Learners via monthly reviews.

All Staff and Learners are given a handbook at the start with Dragon Football Academy and this details Safeguarding, what to look out for, who to report to and if they have any concerns, plus the Policy is on Dragon Football Academy Website and within Onefile where learners can access the policy themselves.

## Designated Person Flowchart Handout

Below is the flow chart for referrals, the escalation process for referrals is that the safeguarding concern is reported to the safeguarding lead who will then investigate and then refer / escalate to the relevant organisation.

