

## Meeting of the Advisory Panel of the London Legacy Development Corporation Health, Safety and Security Committee

**Meeting Date:** Wednesday 14 December 2022

**Time:** 2.00 pm

**Venue:** [Via Teams](#)

The Chair and Members of the Advisory Panel of the London Legacy Development Corporation's Health, Safety and Security Committee are hereby notified and requested to consider items of business set out below at 2.00 pm on Wednesday 14 December 2022.

In accordance with the LLDC's Remote Decision-Making Scheme (available at: <https://www.queenelizabetholympicpark.co.uk/our-story/how-we-work/board-and-committees>) the Chair will consider the items of business set out below and, following consultation with available members of the Audit Committee Advisory Panel, will decide whether to exercise the Corporation's functions in accordance with the recommendations stated.

The press and public may follow the proceedings, except for where exempt information is being or likely to be discussed as noted on the agenda, when those items will be considered in private. Details of how to follow the proceedings will be available on the website here:

<https://www.london.gov.uk/moderngovlldc/ieListDocuments.aspx?CId=416&MId=6339&Ver=4>

A note of the proceedings and record of the Chair's decisions will be published on the Corporation's website as soon as practicable.

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### Committee Members:

Simon Blanchflower CBE (Chair)  
Phil Mead  
Helene Raynsford

#### 1 Apologies for Absence

#### 2 Declarations of Interest

Members are reminded that any interests in a matter under discussion must be declared at the start of the meeting, or at the commencement of the item of business.

**3 Minutes of the previous meeting held on 29 June 2022** (Pages 1 - 6)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to agree the minutes of the meeting held on 29 June 2022.

**4 Matters Arising and Action List** (Pages 7 - 8)

The Chair, following consultation with available Members of the Health, Safety and Security Committee, is asked to note the actions arising from previous meetings.

**5 Executive Director of Park Operations and Venues Update** (Pages 9 - 16)

The Chair, following consultation with available Members of the Health, Safety and Security Committee, is asked to note the Executive Director's report.

**6 London Stadium Update** (Pages 17 - 20)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the Stadium update.

**7 Construction Related Health and Safety Update** (Pages 21 - 22)

The Chair, following consultation with available Members of the Health, Safety and Security Committee, is asked to note construction related health and safety issues.

**8 LLDC Park and Venue Safeguarding Update April- September 2022** (Pages 23 - 24)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the LLDC Venue Safeguarding report.

**9 LLDC Safeguarding Policy** (Pages 25 - 62)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to approve the LLDC Safeguarding Policy.

**10 Health, Safety and Security Risk Update** (Pages 63 - 64)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the update report on health, safety and security risks.

**11 Any other business the Chair considers urgent**

The Chair will state the reason for urgency of any item taken.

**12 Date of Next Meeting**

The next meeting will be on Tuesday 18 April at 2023 at 11am.

**13 Exclusion of the press and public**

*The Committee is recommended to agree to exclude the public and press from the meeting, in accordance with paragraphs 3&7 of Schedule 12A of the Local Government Act 1972 (as amended), in that the following items of business contain information relating to the financial or business affairs of an individual, organisation or the London Legacy Development Corporation (LLDC).*

**14 Minutes of the previous meeting held on 29 June 2022 containing exempt information** (Pages 65 - 68)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to agree the minutes of the meeting held on 29 June 2022 that contain exempt information.

**15 Matters Arising and Actions List that contain exempt information**  
(Pages 69 - 72)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the matters arising from the previous meeting.

**16 Executive Director of Park Operations and Venues' Update - Exempt information relating to the Item on Part 1** (Pages 73 - 186)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the Executive Director's Report containing exempt information.

**17 London Stadium Update - Exempt information relating to the item on Part 1**  
(Pages 187 - 206)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the London Stadium report containing exempt information.

**18 Construction Related Health and Safety Update - Exempt information relating to the Item on Part 1** (Pages 207 - 216)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the update containing exempt information.

**19 LLDC Park and Venue Safeguarding Update April- September 2022 - Exempt information relating to the item on Part 1** (Pages 217 - 218)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the LLDC Venue Safeguarding report containing exempt information.

**20 Health, Safety and Security Risk Update - Exempt information relating to the Item on Part 1** (Pages 219 - 228)

The Chair, following consultation with available Members of the Health, Safety and Security Committee is asked to note the appendix containing exempt information.



## DRAFT MINUTES

### **Minutes of the Meeting of the London Legacy Development Corporation Health, Safety and Security Committee**

**Date:** Wednesday 29 June 2022

**Time:** 11.00 am

**Venue:** Small Auditorium, Floor 10, 5 Endeavour Square, London E20 1JN/via Teams

**Present:** Simon Blanchflower (Chair)  
Phil Mead  
Helene Raynsford (via Teams)

**In Attendance:** Mark Camley, Executive Director of Park Operations and Venues  
Colin Naish, Executive Director of Construction  
Sarah Perry, Director of People and Organisational Development  
Tony Tolley, Head of Safety and Security  
Peter Tudor, Director of Visitor Services  
Bode Akanbi, Health and Safety Manager, London Stadium  
Oliver Shepherd, Senior Programme Manager  
Momna Arif, LLDC Secretariat  
Sue Riley, GLA Secretariat

#### **1 Apologies for Absence**

- 1.1 There were no apologies for absence. Helene Raynsford was attending via Teams and therefore did not count towards quorum.

#### **2 Declarations of Interest**

- 2.1 The Chair noted that Members had declared registrable interests in line with the relevant Standing Orders and asked Members to confirm if they had any interests or additional interests to be declared related to matters listed on the agenda other than those already made and included in the register.

There were no additional declarations of interest.

#### **3 Minutes of the previous meeting held on 24 March 2022**

- 3.1 It was agreed that the minutes of the meeting of the Health, Safety and Security Committee held on 24 March 2022 be signed by the Chair as a correct record.

#### **4 Matters Arising and Actions List**

- 4.1 The Chair had spoken to the Executive Director of Park Operations and Venues in relation to Action 12.2, and MACE had been contacted to discuss whether their safety models would be appropriate for use by the LLDC. A further update would be provided at the next meeting.

#### **4.2 The Committee noted the Actions List.**

#### **5 Executive Director's Report**

- 5.1 The Executive Director of Park Operations and Venues presented the update on health, safety and security incidents.

- 5.2 The Women and Girls' Safety Charter was currently out for consultation and stakeholder feedback. An agenda item on Safety of Women and Girls would be added to the agenda for the next meeting and a further update on the action plan presented.

**[Action: Executive Director of Park Operations and Venues/Secretariat]**

- 5.3 Phil Mead offered to share his knowledge of a safety app for reporting incidents when on site, easily and effectively. A similar app was already in use by staff at the London Stadium and had helped increase the reporting of near misses. There were complications with the range of external partners on the Park using different reporting systems and mechanisms but it was an option that could be pursued with a new provider.

- 5.4 An update was provided on the child who had been recently injured by an e-scooter within the Park. Neither e-bikes or e-scooters were permitted in the Park. A range of measures were being taken to reduce the number of incidents involving bikes and e-scooters, including improved signage, physical barriers and patrolling officers. Discussions were also being held with Just Eat and Deliveroo to address delivery driver behaviour.

- 5.5 Cycle thefts were being raised with estate owners, such as Chobham Manor and East Wick, to help them reduce the level of thefts through good design and the sharing of best practice.

- 5.6 A budget had been identified for mental health awareness training for staff in dealing with vulnerable users in the Park. Helene Raynsford offered to discuss this issue outside of the meeting and to share her expertise.

**[Action: Director of Park Operations and Venues/Helene Raynsford]**

#### **5.7 The Committee noted the report.**

## **6 London Stadium Update**

- 6.1 The London Stadium Health and Safety Manager presented the update on activity related to the London Stadium.
- 6.2 The consistent use of security staff had helped ensure the smooth running of events and football games. Additional Covid-19 measures were also in place to provide staffing resilience. The increase in anti-social behaviour at football matches continued to mirror the national trend.
- 6.3 Lessons learnt from the three days of back to back concerts were discussed. Good forward planning and a focus on staff welfare, with increased breaks and adequate water, had contributed to the success and smooth running of the events. The Chair noted that he had attended an event himself and made positive observations in relation to the stewarding.
- 6.4 The Covid-19 policy for when a member of staff falls ill is to test and stay at home when testing positive for Covid-19.
- 6.5 An update on a review of the fire alarm cause and effect system by the London Fire Brigade and LS185 would be reported to the next meeting.
- 6.6 The Committee noted the report.**

## **7 Construction Related Health and Safety Update**

- 7.1 The Head of Security and Safety Park Operations and Venues introduced the update on health, safety and wellbeing issues related to construction activity.
- 7.2 The Committee noted the report.**

## **8 LLDC Park and Venue Safeguarding Update: January - March 2022**

- 8.1 The Director of Park Operations and Venues presented the update on Safeguarding from January to March 2022.
- 8.2 The Safeguarding Policy was being reviewed and would be submitted to the next meeting of the Committee and then Board, for approval.
- 8.3 The Committee noted the report.**

## **9 Health, Safety and Security Risk Update**

- 9.1 The Executive Director of Park Operations and Venues presented the update on major health, safety and security risks identified by the LLDC.
- 9.2 The Committee noted the report.**

**10 Any other business the Chair considers urgent**

10.1 There was no urgent business.

**11 Date of Next Meeting**

11.1 The Committee noted that the next meeting was due to be held on 14 September 2022 at 2pm.

**12 Exclusion of the Press and Public**

12.1 It was agreed that the public and press be excluded from the meeting, in accordance with Part 1, paragraphs 3&7 of Schedule 12A to the Local Government Act 1972 (as amended), in order to consider the exempt papers. Each of these papers contained information relating to the financial or business affairs of a person or authority or any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

**13 Minutes of the previous meeting held on 24 March 2022 containing exempt information**

13.1 It was agreed that the minutes of the meeting of the Health, Safety and Security Committee held on 24 March 2022 containing exempt information be signed by the Chair as a correct record.

**14 Matters Arising and Actions List that contain exempt information**

14.1 The Committee noted the Actions List containing exempt information.

**15 Executive Director's Report - Exempt information relating to the Item on Part 1**

15.1 The Executive Director of Parks Operations and Venues presented the update containing exempt information.

15.2 The Committee noted the report.

**16 Construction Related Health and Safety Update - Exempt information relating to the Item on Part 1**

16.1 The Head of Security, Safety, Park Operations and Venues, presented the update, containing exempt information.

16.2 The Committee noted the report.

**17 Health, Safety and Security Risk Update - Exempt information relating to the Item on Part 1**

17.1 The Executive Director of Park Operations and Venues introduced the update containing exempt information.

**17.1 The Committee noted the report.**

**18. Close of Meeting**

18.1 The meeting ended at 1pm.

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Chair

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Date

**Contact Officer:** Momna Arif, LLDC, Floor 9, 5 Endeavour Square, London E20 1JN.  
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## Health, Safety and Security Committee Actions List (reported to the meeting on 14 December 2022)

Actions from the last meeting (29 June 2022). (Meeting of 14 September 2022 was cancelled)

Minute No.	Item/Description	Action By	Target Date	Status/note
5.2 (29 June 2022)	<b>Executive Directors Report</b>  Following conclusion of stakeholder feedback and consultation, an agenda item on Safety of Women and Girls to be added to the agenda for the next meeting and a further update on the action plan presented.	Mark Camley	14 September 2022 meeting.	Complete . A presentation was circulated in September 2022 with a short update to be given at the meeting in December
5.6 (29 June 2022)	<b>Executive Directors Report</b>  Following a budget being identified for mental health awareness training, Helene Raynsford and Head of Safety to discuss and share expertise	Helene Raynsford and Tony Tolley	14 September 2022 meeting.	Update to be provided at the meeting.

## Actions from previous meetings

Minute No.	Item/Description	Action By	Target Date	Status/note
5.3 (13 December 2021)	<b>Executive Director's Report</b>  Present accident statistic trend analysis on a regular basis to the Committee.	Mark Camley	On-going.	Some trend data will be presented in the papers but will need to be built up.
12.2 (13 December 2021)	<b>Any other business</b>  A future discussion on safety culture to be discussed at a future meeting of the Committee and would be discussed further outside of the meeting.	Mark Camley	14 September 2022 meeting.	An update is provided in the Executive Director's Report.

**Subject:** Executive Director of Park Operations and Venues Update  
**Meeting date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Mark Camley, Executive Director of Park Operations and Venues

**This report will be considered in public**

## 1. SUMMARY

- 1.1. This report provides an update on health, safety and security activity related to the remit of the Committee.
- 1.2. A report is included in Part 2 of the Agenda, which contains exempt supplemental information. The information is exempt by virtue of part 1 paragraphs 3 and 7 of schedule 12A in that it contains information relating to the business affairs of the LLDC, and information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## 2. RECOMMENDATIONS

- 2.1. **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to note the report.**

## 3. INCIDENTS

- 3.1. The table below sets out the number of incidents between June – October 2022.

Number of incidents:

Type of incident	Stadium	Park and Other Venues	East Bank	Development sites	UCL(E)	Office and other sites
Major (RIDDOR)	1	0	0	0	0	0
Major (non-RIDDOR)	0	0	0	0	0	0
Disease	0	0	0	0	0	0
Minor	60	118	11	0	4	0
Near misses	11		2	0	2	0
Fatalities	0	0	0	0	0	0
Dangerous occurrences	0	0	0	0	0	0

## Stadium Incidents

- 3.2. Prior to the new football season beginning, a message was circulated to staff, contractors and agencies that e-bikes/scooters were prohibited from being stored within the building. Suitable external locations to secure these devices were promoted to staff.
- 3.3. The stats reflect an increase of accidents over the month of July 2022 which is related to a few transition seating contractors suffering hand injuries. Following discussions with the contractor manager, a number of changes were made involving providing suitable PPE, review of the working method, toolbox talks and additional supervision
- 3.4. The two RIDDORs in July 2022 related to a contractor rolling over on his ankle (further details below) and a member of the public climbing over a permanent fence line to gain unauthorised access to an event, resulting in the climber catching his fingers on a spike while jumping down.
- 3.5. Completion of Lower West stand and attainment of licence for 62,500 was a significant task. Some issues around health and safety monitoring on site and review has led to a proposal for enhanced London Stadium health and safety monitoring for next seating transitions in 2023.

### London Stadium near misses/accidents/incidents

Date	Near miss/accident	Corrective action
20.6.22	Pedestrians walkway blocked by catering equipment.	Band crew catering informed and equipment removed. Security and fire officer to keep an eye on contractors.
22.6.22	Forklift without banksman, carrying a pallet of beer kegs, driving in the wrong direction along a one-way system.	Delaware North informed and gave a toolbox talk to all staff driving plant on how to drive safely around site. Disciplinary action to be taken if rules not followed thereafter.
24.6.22	Electric cable running through fire door, door damaging cable and unable to close.	Cable removed by fire team and third party caterer given advice. Main contractor informed of incident and to follow up.
25.6.22	MOP struck in the face by drumstick thrown from stage.	Details of the incident passed on to the tour's production team to follow up with MOP.
28.6.22	Waste euro 1100 bin train left under fire shutter.	Vinci Facilities removed straight away and conducted a toolbox talk with staff member.
8.7.2022	Catering cart left under roller shutter	Re-brief and all staff to monitor
10.7.2022	Pedestrian barrier left under fire /wind shutter	Re-brief and all staff to monitor
15.7.2022	Lift Lobby 8/9 fire door propped open	Re-briefing to staff and contractors – security patrols to monitor.

Date	Near miss/accident	Corrective action
27.7.22	Contractor rolled over on his ankle while walking backwards and carrying a load (RIDDOR). He suffered a suspected fractured ankle.	Contractor supervisor to brief staff again in manual handling practices and a regular review of the working area to be carried out as bowl in transition phase.
28.9.2022	Freeman's Catering vehicle speeding around island	Updated briefing and warning to contractor.
19.10.22	Dropped Radio front Gantry – area was demarked	Use correct lanyards for radios – use earpieces – ensure all tools are tied on.

- 3.6. In the Park and other venues, a mixed cause of incidents with no single area of fault. A spike in recorded health and safety incidents was attributable to the Great Get Together and Festival Beautiful people.
- 3.7. We had a number of concerns for welfare and mental health issues across the period with individuals being passed to emergency services as needed.
- 3.8. We continue to see high speeds by e-bikes, e-scooters, and cycles through heavily populated pedestrian areas.

#### Park and other venues near misses/incidents

Date and time	Location	Detail of incident	Date and time	Location	Detail of incident
07.06.22	North Park	Male fell from bicycle. Self-administered first aid.	01.07.22	Orbit Courtyard	Young male suffered cut to hand, first aid administered.
07.06.22	South Park Playground	Male fell from bicycle. London Ambulance attended.	05.07.22	London Aquatic Centre	London Ambulance called to site for a person with a knee injury.
11.06.22	IQL	Male reported as suicidal, emergency services on site to deal with situation.	08.07.22	Stratford Walk	Person suffered a seizure, declined first aid and London Ambulance.
11.06.22	White Post Lane	Male reported as suicidal. London Ambulance attended site.	24.07.22	South Park Gym	Person fell from gym equipment. Refused assistance and left site.

Date and time	Location	Detail of incident	Date and time	Location	Detail of incident
14.06.22	Fountain Area	Young child fell and grazed their knee. First aid administered	24.07.22	Great Get Together	Main event-
17.06.22	Stratford Walk	3-year-old child fell and grazed their elbow. First aid administered by parent			14 minor incidents,
27.06.22	Waterden Road	London Ambulance and Police attended site to assist a female suffering with mental health issues.			40 plasters administered,
27.06.22	Tessa Jowell Boulevard	A child fell from their scooter. Plaster and, wipes provided to parents			1 advised to go to hospital due to gravel in hand.
28.06.22	Waterden Road	Cyclist collided with a vehicle. Parties exchanged details.			6 minors incidents at LMCT
27.07.22	Jessa Jowell Boulevard	4-year-old child suffered a cut to their knee. Plasters & wipes provided to Parents.			

Date and time	Location	Detail of incident	Date and time	Location	Detail of incident
12.10.22	London Aquatics Centre	London Ambulance attended site due to a customer having difficulty swimming.	29.08.22	South Park gym area	Child fell from gym equipment, London ambulance attended site.
16.10.22	Carpenters Road	A cyclist fell off their bicycle. Person left site prior to Security arriving.	02.09.22	F10 bridge	Child fell suffering cuts to their knee. Plasters and wipes provided
04.10.22	Waterden Road	Road traffic collision, drivers exchanged details and left the area.	03.09.22	Beautiful People, North Park	Six minor incidents during event.
27.09.22	H05 Bridge	Contractor attempted to gain access to South Park and collided with HVM. Damage to vehicle, HVM checked and operational.	04.09.22	Beautiful People, North Park	19 minor incidents during the event.
22.09.22	Mandeville Place	Person collided with a cyclist, suffering cuts to arms and knee. Plasters and wipes provided to Parents.	01.08.22	South Playground	A child fell in the playground. London Ambulance attended site.
20.09.22	MSCP	Member of the public verbally aggressive towards EQUANS cleaner.	02.08.22	2012 Gardens	An adult fell while they were running. Dressing applied to wound.

Date and time	Location	Detail of incident	Date and time	Location	Detail of incident
06.09.22	Bassett Lane	Teenager fell from his Electric Scooter injuring his head and leg. London ambulance attended site and took him to hospital.	04.08.22	Lee Valley Walk	Adult fell from cycle. London ambulance attended site
			05.08.22	Siding St	Adult suffering chest pains. London Ambulance attended site

3.9. The following proactive interventions were undertaken during the period.

	Park	East Bank	UCL	Stadium
Tool Box Talks	0	24	567	12
Safety Moments	0	0	21	0
Inductions	28	Not reported	1115	511
Safety Tours (SPVS) / Patrols	85	163	390	183

#### 4. COVID-19

- 4.1. Following the latest Government guidelines, the phased return to the office continues, staff are continuing to work from home and come in when needed. n place.
- 4.2. The Park has remained popular with local people during the period, with attendance of between 350,000 to 490,000 visits per month.
- 4.3. There were two major events in the Parkland (outside of the stadium) during the period – Great Get Together and Festival Beautiful People. Several smaller events took place throughout the period

#### 5. KEY DEVELOPMENTS

- 5.1. During the period, Anti-Social Behaviour decreased; but robberies, phone snatches and cycle theft increased. A workshop was held with MPS and local partners to look at targeting resources, co-ordinating our approach and incident communications. The Multi-Storey Car Park remains a draw for skateboarders and cyclists.
- 5.2. There were no major issues on either the Chobham Manor or the Eastwick developments – although both areas have again seen an increase in theft of bicycles and phone snatches.
- 5.3. There will be a presentation on the work of the Women's Safety Group.

## 6. APPENDICES

6.1. None.

### List of Background Papers

- None

**Report originator(s):**

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**Subject:** London Stadium Update  
**Meeting date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Peter Swordy, Director of Health Safety and Compliance LS185

**This report will be considered in public**

## 1. SUMMARY

- 1.1. This report provides an update on Health, Safety and Security activity related to London Stadium.
- 1.2. An appendix is included in Part 2 of the Agenda, which contains exempt supplemental information. The information is exempt by virtue of part 1 paragraphs 3 and 7 of schedule 12A in that it contains information relating to the business affairs of the LLDC, and information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## 2. RECOMMENDATION

- 2.1. **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to note this report.**

## 3. LONDON STADIUM EVENTS AND MATCHES

Event	Date	Actual attendance
Man City	7 Aug 2022	56,275
Viborg	18 Aug 2022	22,949
Brighton	21 Aug 2022	44,311
Tottenham Hotspur	31 Aug 2022	44,489
FCSB	8 Sept 2022	33,442
Newcastle	11 Sept 2022	POSTPONED - QE2
Wolverhampton	1 Oct 2022	38,971
Fulham	9 Oct 2022	49,552
Anderlecht	13 Oct 2022	34,905
Bournemouth	24 Oct 2022	48,971
Silkeborg	27 Oct 2022	28,955

Event	Date	Actual attendance
Crystal Palace	6 Nov 2022	48,754

#### **4. COVID UPDATE**

- 4.1. There have been some recent cases of Covid among contractors and emergency services but generally in decline.

#### **5. SPORTS GROUND SAFETY AUTHORITY LICENCE**

- 5.1. The SGSA continues to be insistent on reporting of persistent standing, however on a recent visit they were satisfied about actions being taken in Block 216 and 217 which are seen as areas of risk – near segregation line.

#### **SECURITY**

- 5.2. The national terrorism Threat Level is Substantial – an attack is likely.
- 5.3. SGSA have issued research findings (1000 stewards surveyed 56 from London Stadium / Stadium agencies) on steward motivation and found the following:



5.4. The whole report can be found here [SGSA-Evaluation-of-Stewarding.pdf](#).

## 6. PROJECTS

6.1. There are several projects currently underway:

- Back of house lighting completion now end of April 2023;
- Workforce Building January 2023;
- PA System re install/refurbish January 2023;
- New West Stand Bars December 2022; and
- Various sustainability projects pending approval 2023.

6.2. Coordination of these projects involves extensive planning and ensuring coordination is done through Head of Projects and Daily Activity Briefings (DABS).

## **7. HEALTH AND SAFETY ADVICE AND TRAINING**

- 7.1. Audits have been undertaken of Vinci and DN operations. Action plans have resulted. Currently West Ham remains to be agreed and arranged with WH.
- 7.2. Substantial training has been undertaken with G4S team on a range of health and safety and security issues.
- 7.3. Tabletop exercise due in January/February 2023 for event safety.
- 7.4. Public order training with police planned for February 2023.

## **8. FINANCIAL IMPLICATIONS**

- 8.1. Some minor purchase include:
  - Better logistics trollies for Bridge Managers;
  - New ramps for egress at Northern Ticket Hall (old ones of wood and now defunct); and
  - Replacement office chairs for 24/7 and accreditation offices.
- 8.2. The departure of Bode Akanbi, London Stadium Health and Safety Manager, will result in some consultancy support for event days and non-event days. The first campaign for a replacement was unsuccessful. A new campaign will be launched shortly.

## **9. LEGAL IMPLICATIONS**

- 9.1. There are no legal implications

## **10. PRIORITY THEMES**

- 10.1. The report has no implications for LLDC's priority themes.

## **11. APPENDICES**

- 11.1. There are no appendices to this report.

### **List of Background Papers**

- None

**Report originator(s):**

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**Subject:** Construction Related Health and Safety Update  
**Date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Tony Tolley, Head of Security and Safety LLDC Park Operations and Venues

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**This report will be considered in public**

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## **1. SUMMARY**

- 1.1. This report provides an update on Health, Safety and Wellbeing issues related to construction activity. There have been several Health, Safety and Wellbeing matters to arise over the last period, across the range of construction areas.
- 1.2. A report is included in Part 2 of the Agenda, which contains exempt supplemental information. The information is exempt by virtue of part 1 paragraphs 3 and 7 of schedule 12A in that it contains information relating to the business affairs of the LLDC, and information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## **2. RECOMMENDATION**

- 2.1. **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to note this report.**

## **3. AREAS OF ACTIVITY**

- 3.1. The report in part 2 sets out further exempt information relating to different areas of activity:
  - MACE – UCL
  - East Bank
  - Construction Management Group

## **4. FINANCIAL IMPLICATIONS**

- 4.1. There are no financial implications.

## **5. LEGAL IMPLICATIONS**

- 5.1. There are no legal implications.

## **6. PRIORITY THEMES**

- 6.1. LLDC's priority themes will be considered as the workplan is implemented.

## 7. APPENDICES

7.1. None.

<b>List of Background Papers:</b> <b>None</b>
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**Subject:** LLDC Park and Venue Safeguarding Report April - September 2022  
**Date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Peter Tudor, Director of Park, Operations and Venues (DSO)

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**This report will be considered in public**

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## **1. SUMMARY**

- 1.1 This paper provides an update on Safeguarding for April – September 2022 as reported by the following:
- ArcelorMittal Orbit
  - Copper Box Arena
  - London Aquatics Centre
  - The Last Drop
  - Timber Lodge
  - 3 Mills Studios
  - London Stadium
  - Waterways activities
  - Hackney Bridge
  - Park kiosks
  - LLDC Events
  - Our Parklife (volunteer programme)
  - Park Security
- 1.2. There were 32 reported incidents involving vulnerable people related to general Park visitors and 19 incidents reported in relation to the venues.
- 1.3. LLDC is not responsible for the Lee Valley venues or Here East.
- 1.4. A report is included in Part 2 of the Agenda, which contains exempt supplemental information. The information is exempt by virtue of part 1 paragraphs 3 and 7 of schedule 12A in that it contains information relating to the business affairs of the LLDC, and information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## **2. RECOMMENDATION**

- 2.1. **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to note this report.**

## **3. VENUES AND PARK**

- 3.1. All venues were in operation. There were 19 reported safeguarding issues relating to the venues during the quarter. Details of the significant incidents are set out in the private paper.
- 3.2. London Aquatics Centre: there have been four incidents in this period. A toddler was able to leave the building without being apprehended when the child's carer was distracted, and two children were left in the building by their parent unsupervised. Two of the incidents are outlined in the private section of this paper.

- 3.3. At London Stadium there were 13 safeguarding issues during the busy six-month

period: seven lost/reunited children, two potential issues of parents purchasing alcohol for minors, and four involving vulnerable people separated from the rest of their party.

- 3.4. 3 Mills Studios: at the end of July 2022, LLDC received an anonymous letter alleging that a construction worker potentially engaged in the upgrade of 3 Mills Studios had been observed in an inappropriate approach to a female teenage school pupil. The construction lead conducted a thorough investigation of the staff on site on the date of the incident (01/07/22) but the individual could not be identified, and there was other construction work taking place in the local area. A toolbox talk on appropriate/inappropriate behaviour was given to all staff on the day after the allegation was made and has been repeated regularly through to the completion of the works. An upgrade of the 3 Mills CCTV system will increase storage capacity, as the footage from the date of the alleged incident had automatically been wiped in the 23 days it took for the allegation to be received.
- 3.5. Separately, there were 19 reports of vulnerable people on the Park in this six month period, including people intoxicated and in need of assistance. There were four reports of individuals threatening suicide, and park security and the police intervened. There were nine instances of lost and found children over the summer. There were two alleged incidents at the Pudding Mill Lane arena which are set out in the private paper.
- 3.6. There were over 2.5m visits to the Park in April-September 2022.
- 3.7. LLDC Events: in this period the safeguarding procedures were developed for LLDC's East London Summer School (25/07-06/08/22), 10<sup>th</sup> Anniversary Celebrations (22/07/22), the Great Get Together community festival (23/07/22) and the Celebrating 10 Years festival (24/07-08/08/22).

#### **4. POLICIES**

- 4.1 The LLDC Safeguarding Policy has been revised and is presented in a separate paper at this meeting.
- 4.2 There have been no changes to the venue policies.

#### **5. FINANCIAL IMPLICATIONS**

- 5.1 There are no financial implications.

#### **6. LEGAL IMPLICATIONS**

- 6.1 There is no legal implication.

#### **7. APPENDICES**

- 7.1. None.

##### **List of Background Papers:**

LLDC's Safeguarding Policy v16

**Report originator:**

**Peter Tudor**

**Email:**

[PeterTudor@LondonLegacy.co.uk](mailto:PeterTudor@LondonLegacy.co.uk)



**Subject:** LLDC Safeguarding Policy  
**Date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Peter Tudor, Director of Park, Operations & Venues (DSO)

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**This report will be considered in public**

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## **1. SUMMARY**

- 1.1. The LLDC Safeguarding Policy has been implemented for LLDC and the Park since approval and publication in 2019. The policy has been reviewed and revised.

## **2. RECOMMENDATIONS**

- 2.1. **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to approve the Safeguarding Policy.**

## **3. REVISIONS**

- 3.1. The structure of the Policy has been revised with a focus on process, and the background information (e.g. legislation, glossary) moved to appendices.
- 3.2. The breadth of coverage of the Policy has been broadened to recognise the wider Park and offsite properties etc.
- 3.3. The previous version placed a burden of expectation on LLDC that in practice we are not equipped to meet – for example, LLDC personnel do not get involved with Child Protection Orders, and very rarely know the details of the people involved in any issues at the Park. These references have been revised to recognise the areas where LLDC is able to support directly, and to provide additional information on reporting procedures.
- 3.4. The Policy provides information on the obligations of third parties working with LLDC and at the Park, and will be obligatory under the operator contracts currently being procured. The Policy also addresses the events/activities which LLDC creates and hosts (e.g. East London Summer School).
- 3.5. The local authority contact details section has been revised.
- 3.6. The proposed changes have been reviewed and agreed with the Local Authority Designated Officer at LB Newham.

## **4. FINANCIAL IMPLICATIONS**

- 5.1 There are no financial implications.

## **5. LEGAL IMPLICATIONS**

6.1 There are no legal implications.

## **6. APPENDICES**

6.1. Appendix 1 – LLDC Safeguarding Policy V16

<b>List of Background Papers:</b>
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None
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## Appendix 1



## Queen Elizabeth Olympic Park – Safeguarding Policy

September 2022

### Version Control

Version / revision	Date	Description of changes	Reviewed/edited by
V12.0	June 19	Addition of Section 17 and App D&E	Anthony Tolley
V13.0	June 19	Ammendments to Section wording	Anthony Tolley
V14.0	Aug 19	Minor Ammendments to lay out	Anthony Tolley
V15.0	Oct 19	Addition of Gangs and references to criminal exploitation	Anthony Tolley
V16.0	Sept 22	Updated sections	Peter Tudor
		Next Review September 2023	

### Approvals

Approval by	Name/Department	Signed (Y/N)	Date
Author	Tony Tolley – Park, Operations & Venues	Y	11/11/19
Park, Operations and Venues	Mark Camley – Exec Director POV	N	Minuted
EMT/Board	APPROVED 11/11/19 – noted in minutes	N	11/11/19
TBC			

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# 1. Executive Summary: LLDC Safeguarding Policy

- 1.1** This policy and associated procedures outline the principles and approach applied by London Legacy Development Corporation (LLDC) as essential for Safeguarding at the Park, LLDC off site properties and the LLDC offices.
- 1.2** It relates to the Safeguarding of children (under 16), young people (16-18) and adults at risk (18 up) and also those at risk of radicalisation.
- 1.3** Whilst there are specific lead officers identified within LLDC, it is everyone's responsibility to safeguard and protect children, young people and adults at risk. Where required, LLDC will work to promote and safeguard the welfare of individuals and to minimise the risks of harm.
- 1.4** All colleagues are responsible for reporting any safeguarding concerns to their Head of Department and/or a Designated Safeguarding Officer. A list of the Designated Safeguarding Officers can be found at Section 4.
- 1.5** Safeguarding issues are likely to come to light through one of four main methods: direct observation, disclosure from a child or adult at risk, observation by a third party or referral from an external Public, Statutory or Regulatory Body (PSRB).
- 1.6** It is important to report any concern promptly and not to assume that someone else will have reported it. If you are told that the authorities are already aware of a concern you still need to report it to a Designated Safeguarding Officer so that this can be confirmed officially. You do not need to make a judgement on how serious a concern is, or even whether you believe a concern to be true. You are not responsible for deciding whether abuse has occurred or assessing the level of risk.
- 1.7** Anyone wishing to report a suspicion or concern should complete the Safeguarding Incident Reporting Form (Appendix A), keeping as accurate a record as possible. If the disclosure is from the individual themselves, then care must be taken, not to lead or interrogate the individual in a way that could prejudice further action by the relevant authorities (see Section 3). The initial formal reporting of any incident or disclosure should be sent through a Designated Safeguarding Officer.
- 1.8** Safeguarding issues may also arise as a result when LLDC may become aware of concerns about an individual which are not specifically related to LLDC venues or activities, nor within LLDC's direct control.
- 1.9** In all such instances once a report has been provided to, or prepared by, a Designated Safeguarding Officer, the officer will work with a Senior Lead for Safeguarding to determine the most appropriate course of action.
- 1.10** The process to report a concern is outlined at Section 3.
- 1.11** A flowchart of the procedure to report concerns of radicalisation is at Appendix C.
- 1.12** This policy forms part of the overall set of policies and procedures that fall under our safeguarding umbrella as follows;
- Recruitment Policy
  - Whistleblowing Policy
  - Security plan
  - Missing Person Policy
  - Health and Safety Policy
  - LLDC Modern Slavery Statement

## 2. Safeguarding at LLDC

- 2.1** The purpose of London Legacy Development Corporation's safeguarding policy is to ensure every child and vulnerable adult is safe and protected from harm at the Park, LLDC offices and properties.
- 2.2** LLDC manages Queen Elizabeth Olympic Park (QEOP), 3 Mills Studios, owns properties off the Park, and operates its headquarters offices at 5 Endeavour Square the Park Depot and Park Headquarters buildings.
- 2.3** LLDC adopts the highest standards and takes all reasonable steps in relation to the health, safety and welfare of children, young people and adults accessing its services and facilities. It is unacceptable for a child, a young person, or an adult to experience any form of harm or abuse. Their welfare is paramount and they have the right to protection and support.
- 2.4** LLDC's offices are predominantly an adult environment. The Park is a family destination with playgrounds, schools, and activities for children in the venues and attractions. 3 Mills Studios can on occasion have child performers as part of productions using the site. The LLDC venue operators are responsible for Safeguarding in their premises and are required to maintain site specific policies and report to LLDC on a quarterly basis. LLDC also stages events for the local community at which children may be present. This policy applies to all those receiving services from or providing services on behalf of LLDC and its appointed contractors.
- 2.5** LLDC recognises the contribution it can make to protecting adults and children from harm and supporting and promoting the welfare of those coming into contact with our organisation and coming to the Park. The basis of our policy is protection, prevention, and support.
- 2.6** This means we will always work to:
- Protect children, young people and adults from maltreatment.
  - Prevent impairment to, children, young people's and adults' health or development.
  - Identify children, young people and adults who may be in need of extra help.
  - Ensure that our services assist children, young people and adults to be safe.
- 2.7** We will do this by ensuring the relevant personnel are alert to the different types of potential abuse:
- **Physical Abuse** involving physical harm
  - **Emotional Abuse** involving emotional ill treatment
  - **Sexual Abuse** involves forcing someone to take part in sexual activity
  - **Neglect** through the failure to meet basic physical and/or psychological needs
  - **Radicalisation** through exposure to extremist views
- 2.8** **Children's** welfare is of paramount importance. Children are also vulnerable to physical, sexual and emotional abuse by their peers and siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, and support should be offered to the perpetrator and the victim. There are limited opportunities for LLDC to observe or witness such behaviour, but LLDC will not tolerate or dismiss concerns relating to peer on peer abuse.

**2.9 Adults:** All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment. LLDC supports the six principles of adult safeguarding as outlined by The Care Act 2014:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - The least intrusive response appropriate to the risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through working with communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

**2.7** We recognise that children and adults with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. These can include:

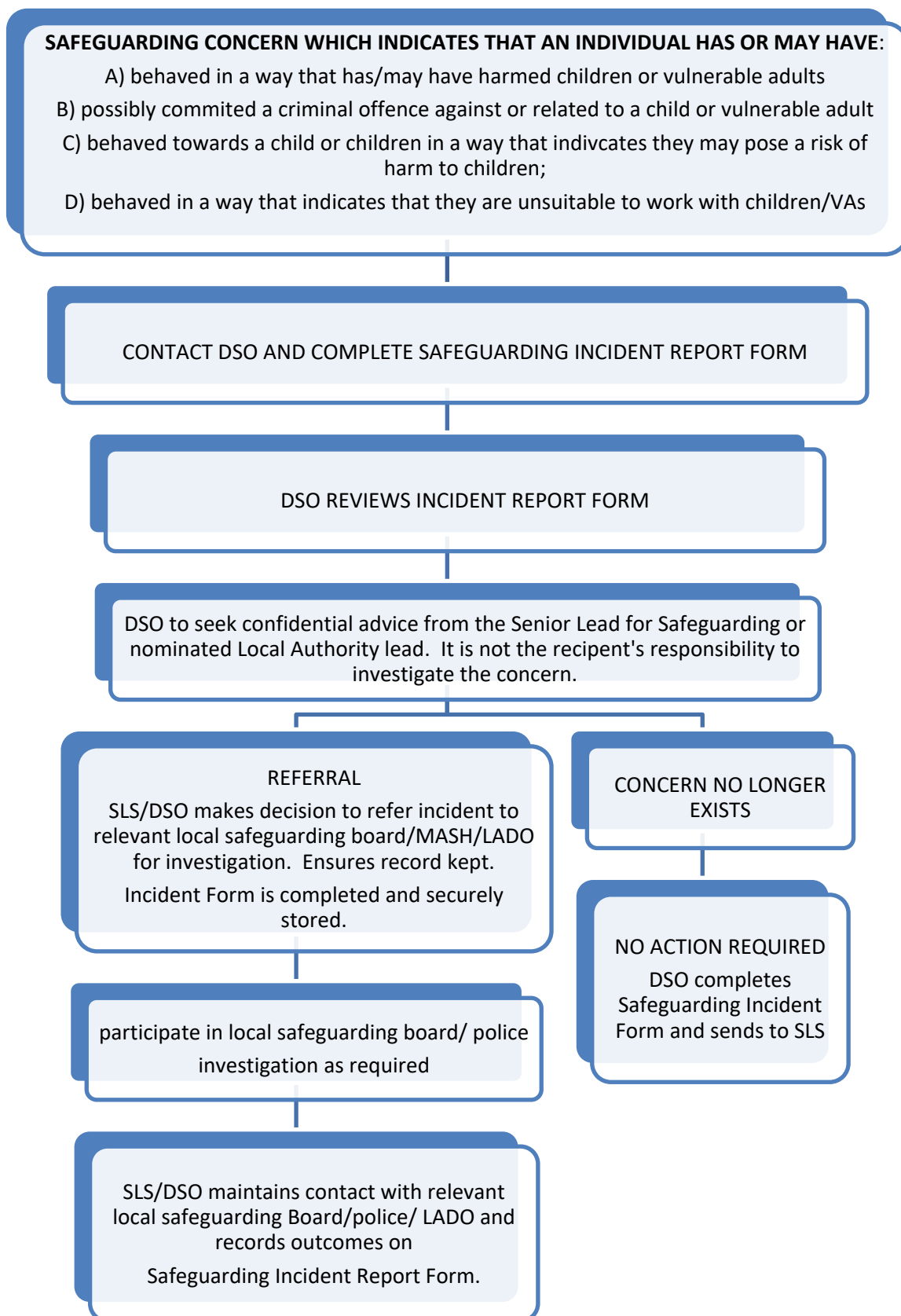
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the adult or child's disability.
- Adults or children with SEND can be disproportionately impacted by issues such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

**2.8** LLDC will seek to ensure that we are inclusive and make reasonable adjustments for disability. We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk', and that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

**2.9** Effective working relationships are maintained with colleagues from other agencies in line with Working Together to Safeguard Children 2018, The Care Act 2014, and Newham Safeguarding Children Board procedures.

### 3 Safeguarding Procedure: How to report a concern

3.1 Use this flowchart to determine your actions:



- 3.2 It is unusual for people to make allegations to LLDC directly. However, we may witness activity that raises a concern (eg: on the Park, through CCTV, through interaction with individuals) and in these instances the reporting process will be as above and using the form at Appendix A.
- 3.3 In the case of a disclosure from someone over the age of eighteen who is not an adult at risk themselves, your initial role is to encourage that individual to make direct contact with Social Services or the Police themselves unless you believe there is significant and immediate risk to other children or adults, in which case, follow the procedure to report matters to the Designated Safeguarding Officer.
- 3.4 Where an individual chooses to disclose information directly to you, you should:
- Stay calm
  - Listen carefully to what is said without interrupting
  - Be non-judgemental
  - Explain that it is likely that the information will need to be shared with others, do not promise to keep secrets
  - Make it clear that you are taking them seriously
  - Allow the person to continue at his / her own pace
  - **Do not** interrupt the individual as they give details of significant events
  - In the event of an accusation, record only what is said (as is legally required).
  - Keep questions to a minimum to ensure an accurate understanding of what has been said. Ensure that any questioning is neutral i.e. does not show a bias on either side. Any questions must be restricted for purposes of clarification only. Many cases fall down where it is possible to infer that leading questions were asked even at these early stages.
  - **Do not** interrogate the individual and do not make suggestions to the individual about what may or may not have happened; your role is to listen and reassure only.
  - Reassure the child or person that they have done the right thing in telling you.
  - Reassure them that you are going to do everything that you can to help. Tell them what you will do next and with whom the information will be shared.
  - Make as accurate a record of what was said and done as soon as possible and before leaving work or talking to others. Use the participant's own words. Also record the date, time and venue of the incident.
  - Keep all original notes as they may be needed for evidence;
  - **Do not** examine the individual to inspect alleged injuries;
  - Report the allegation immediately to one of the Designated Safeguarding Officers or nominated authority for appropriate action;
  - **Do not** discuss this with anyone else. If you require some reassurance yourself, tell the Designated Safeguarding Officer.
  - **Do not** make any judgements or jump to conclusions on the basis of what you have heard or seen.
  - If a disclosure occurs out of hours and you need immediate assistance use the contact details within this document to contact the Police for advice on 101.

- If you consider there to be serious, urgent immediate danger to a child, young person or adult you can refer to the Police on 999.
- It is important that everyone in the organisation is aware that the first person who encounters a case of alleged or suspected harm or abuse is not responsible for deciding whether or not abuse has occurred, this rests with professional safeguarding agencies.

## 4 Roles and Responsibilities

### 4.1 Roles and Contacts

Senior Lead (Board Member) for Safeguarding	Simon Blanchflower	020 3288 1800
Designated Safeguarding Officer (DSO)	Peter Tudor	0789 051 0074
Designated Safeguarding Deputy (DSD)	Tony Tolley	0788 375 2486
HR Lead for Safeguarding	Debbie Wooldridge	0203 288 1800
GENERAL CONTACT EMAIL	safeguarding@londonlegacy.co.uk	
Security Manager	Phil Whitehead, Equans	07816 858997

### 4.2 Roles and Responsibilities

Role	Responsibilities
<b>The Senior Lead for Safeguarding</b> Is accountable for ensuring the effectiveness of this policy and our compliance with it.	<ul style="list-style-type: none"> <li>○ The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance and the requirements of Newham Safeguarding Children Board and Adults Board's procedures.</li> <li>○ A senior colleague from LLDC colleagues is designated to take the lead responsibility (Designated Safeguarding Officer) for safeguarding.</li> <li>○ To ensure that Safeguarding is included as an agenda item at Board meetings whenever appropriate.</li> <li>○ To ensure that the Board takes safeguarding issues into consideration when making decisions.</li> <li>○ To contribute to and to approve the Safeguarding Action Plan.</li> <li>○ To present to the Board, on an annual basis, an update on Safeguarding.</li> <li>○ To help ensure that relevant employees receive up to date training on Safeguarding.</li> </ul>
<b>The Designated Safeguarding Officer</b> (and deputy) is a member of colleagues who takes lead responsibility for safeguarding and child protection at LLDC.	<ul style="list-style-type: none"> <li>○ Carry out their role in accordance with the responsibilities outlined in Working Together to Safeguard Children 2018.</li> <li>○ Provide advice and support to other colleagues. Any concern for a child/adult's safety or welfare will be recorded in writing and given to the DSO.</li> <li>○ During working hours, the DSO and/or a deputy will be available for colleagues to discuss any safeguarding concerns. If a DSO is not available in person, we will ensure that they are available via telephone and/or any other relevant media.</li> <li>○ Ensure procedures are in place for dealing with allegations against colleagues and volunteers who work with children/VA in line with statutory guidance.</li> <li>○ Ensure policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by colleagues.</li> <li>○ Ensure policies and procedures are updated.</li> <li>○ Ensure all colleagues and volunteers feel able to raise concerns about poor or unsafe safeguarding practice and such concerns are addressed sensitively in accordance with agreed internal procedures.</li> <li>○ Through appropriate training, knowledge and experience liaise with Police, Adult or Children's Services where necessary, and make referrals of suspected abuse.</li> <li>○ Maintain written records ensuring that they are kept confidential and stored securely.</li> <li>○ Ensure that all colleagues members and volunteers are aware of our policy and the procedure they need to follow.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Ensure that relevant colleagues receive a safeguarding induction and are provided with a copy of this policy and the colleagues code of conduct.</li> <li>○ Ensure that all colleagues undertake appropriate safeguarding training relevant to their role.</li> <li>○ Ensure that procedures are in place for dealing with allegations against members of colleagues and volunteers who work with children in line with statutory guidance.</li> <li>○ Liaise with the Designated Officer for the Local Authority ('LADO') in the event of an allegation of abuse being made against a member of colleagues where their role involves working with children.</li> <li>○ With the HR lead for Safeguarding ensure that adequate up to date and informed procedures and processes are in place for dealing with allegations against members of colleagues and volunteers who work with children in line with statutory guidance.</li> <li>○ With the HR lead for Safeguarding, ensure that Safer recruitment practices are in place and are followed to prevent individuals who may pose a risk to children from having access to children within the organisation.</li> <li>○ Ensure all estate operators and event owners safeguarding policies are in place and that there is alignment with the LLDC Safeguarding Policy.</li> </ul>
<b>Security Manager and Security Control Room</b>	<ul style="list-style-type: none"> <li>• Monitoring activity on the Park</li> <li>• Raising issues as they occur with the relevant personnel.</li> <li>• Completing the form at Annex A where appropriate.</li> <li>• Liaising with emergency services.</li> <li>• Retaining CCTV records and providing them to police on request.</li> </ul>
<b>LLDC Line Managers</b>	<ul style="list-style-type: none"> <li>• Working with POD/HR to determine whether specific roles require a Safeguarding assessment.</li> </ul>

- 4.3 Training will be provided relevant to each role, and additional training as required. The DSO will maintain a record of the training provided.

## 5 Induction and Training

- 5.3 All roles at LLDC are assessed to determine whether the duties are likely to require the job holder to come into contact with children and/or vulnerable adults. When colleagues join our organisation, they are informed of the Safeguarding policy and arrangements in place. New colleagues with roles relevant to Safeguarding are required to read this Policy.
- 5.4 Colleagues likely to be in contact with children and vulnerable adults will receive safeguarding training during their induction period. This programme will include information relating to how to manage a disclosure from a child, how to record concerns, and the remit of the role of the DSO. The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability relating to their work with children and/or vulnerable adults. Colleagues are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- 5.3 Park Security and Park volunteers (Park Champions) are the main public face of the LLDC interfacing with Park visitors. Park Security are trained to recognise potential safeguarding concerns and to intervene and report where necessary; DBS checks are mandatory. The Park Champion programme is delivered by Our Parklife; safeguarding measures are in place, and relevant roles are assessed for potential safeguarding requirements. Most roles do not involve interaction with children and vulnerable adults.
- 5.4 Where LLDC identifies vulnerable adults or children in need of support, we will carry out our reporting responsibilities in accordance with Newham Safeguarding Children Board and Adults Board guidance, with whom this Policy has been developed.
- 5.5 LLDC will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities:
- i. Colleagues receive safeguarding updates where appropriate (for example, via email, e-bulletins, staff meetings), as required to provide them with the relevant skills and knowledge to safeguard children and adults effectively.
  - ii. Contractors and colleagues likely to be in contact with children and/or vulnerable adults will be given a set of our safeguarding procedures. They will be informed of whom our Senior Lead for Safeguarding and DSO are and what the recording and reporting system is.
  - iii. We encourage our colleagues and operators to keep up to date with the most recent local and national safeguarding advice and guidance accessible via Newham Safeguarding Children Board and Adults Board and [www.LondonSafeguardingProcedures.co.uk](http://www.LondonSafeguardingProcedures.co.uk).
  - iv. All leads for Safeguarding will also undertake and keep up to date appropriate training to ensure they are able to carry out their duty to safeguard all of the children or vulnerable adults coming into contact with LLDC.
- 5.6 **LLDC EVENTS:** LLDC occasionally delivers its own events on the Park and in other locations (eg: The Great Get Together). Where these are likely to involve children and/or vulnerable adults, an appropriate risk assessment will be undertaken in advance by the event owner responsible, and this will be reviewed by the DSO. A report after the event date will be provided by the event owner. The LLDC personnel responsible for delivering these events will receive training in this process. See Appendix G.

- 5.7 The relevant colleagues will through this Policy know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. The aim is for every child to know what the adult will have to do with any information they have chosen to disclose should it outline a safeguarding concern. Identified posts will receive specific training befitting their roles. The procedure outlined in Section 3 will be followed.

## 6 Third Parties working at LLDC and the Park

- 6.1 **LLDC CONTRACTORS:** All contractors are required to provide an up to date Safeguarding Policy relevant to their premises and activities. Significant Safeguarding issues will be reported to LLDC as they arise, and a quarterly report will be provided by each contractor for LLDC review. Contractors are required to keep up to date with the local and national safeguarding advice. Guidance is provided by Newham Safeguarding Children Board and Adults Board and the London Child Protection Procedures.
- 6.2 **PARK VENUES:** LLDC has appointed operators to manage the ArcelorMittal Orbit, Copper Box Arena, London Aquatics Centre, London Stadium, Podium, Timber Lodge and Kiosks. The Venues are required to report Safeguarding concerns immediately, and submit a formal quarterly report. LLDC and its DSO will review any incidents, the circumstances of any cases and seek to determine whether there are any improvements that need to be made to the organisation's procedures or practices. These reviews will be recorded accordingly and stored along with the incident files. We will review this policy to reflect any changes to legislation and best practice that may impact its use, or that of the associated procedure and guidance, within the organisation.
- 6.3 **VOLUNTEERS:** The Park Volunteering programme is managed by a third-party contractor who is responsible for ensuring that the LLDC Safeguarding Policy is disseminated to all volunteers and enforcing the Policy through its own Safeguarding standards. These are reviewed regularly by LLDC. Most volunteer roles do not involve working with children or vulnerable adults, and DBS checks are required for relevant roles.
- 6.4 **EVENT OWNERS:** the majority of events taking place at the Park are organized by companies who rent the Park for the activities. Where these events are likely to involve children and/or vulnerable adults, an appropriate risk assessment will be undertaken by the responsible LLDC Event Manager for review by the DSO. A report after the event date will be provided by the event owner. See Appendix G.
- 6.5 **LLDC ACTIVITIES:** Young people are included in LLDC's advisory network, including the Legacy Youth Voice which is run by Kaizen, an external company, for LLDC. A safeguarding policy is in place for this organisation.

## 7 Pathways to Help and Support

- 7.1 It is not the responsibility of colleagues to investigate welfare concerns or determine the truth of any disclosure or allegation. However, all personnel have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy. All concerns about a child or vulnerable adults should be reported without delay and recorded in writing using the agreed procedures set out in Section 3.
- 7.2 The DSO should be used as a first point of contact for worries, concerns and queries regarding any safeguarding concerns at LLDC. Any colleague or visitor who receives a disclosure of abuse or suspects that a child or vulnerable adult is at risk of harm must report it immediately to the DSO. In the absence of a DSO, the matter should be brought to the attention of the Senior Lead for Safeguarding.
- 7.3 The DSO will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented. The DSO will decide whether to make a referral to the Police, Adults or Children's Services when there are safeguarding concerns.
- 7.4 If at any point, there is a risk of immediate serious harm to an adult or child, a referral should be made to the Police. Anybody can make a referral.
- 7.5 Colleagues should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, Adults' Services or the Police if:
- i. The situation is an emergency and the DSO and the Senior Lead for Safeguarding are unavailable.
  - ii. They are convinced that a direct report is the only way to ensure the adult or child's safety.
  - iii. They believe that a reported allegation or concern is not being dealt with appropriately by their organisation.
- 7.6 If a referral to Adults or Children's Services has not met the threshold for support or statutory intervention, the DSO will make a full written record of the decision and outcome.
- 7.7 Any colleague who believes that a safeguarding matter has not been responded to appropriately and in accordance with the procedures outlined in this Policy should raise their concerns with the Senior Lead for Safeguarding. If any colleague does not feel the situation has been addressed appropriately at this point, they should contact LBN Adult Services or Children's Services directly with their concerns. The whistleblowing policy may apply in these circumstances.
- 7.8 LLDC recognises that some colleagues (especially Community and Regeneration; Park, Operations and Venues and E20) may be in a position to identify concerns to help prevent:
- Child sexual exploitation
  - Children or vulnerable persons becoming involved with gang/criminal activity
  - children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV),
  - children from becoming involved in radicalisation and extremism,
  - Modern Day Slavery.
- If colleagues have a concern regarding a child or adult that might be at risk in these instances they should inform the DSO who will liaise with the Police and Children's Services.

## 8 Records and Information Sharing

- 8.1 Colleagues concerned about the welfare or safety of any child or vulnerable adult at LLLDC must record their concern through the agreed reporting procedure without delay.
- 8.2 Information recorded will be kept in a secure cabinet or electronically and will be the responsibility of the DSO/HR. The information will only be shared on a basis of 'need to know' in the adult's or child's interests and on the understanding that it remains strictly confidential.
- 8.3 LLDC takes a proactive view on sharing information with the relevant statutory authorities. This may include the need to share information about other children and any adults with whom the at risk child has contact, which may impact the child's safety or welfare. This outlook regarding effective information sharing supports the guidance in s10 of the **Children Act 2004**.
- 8.4 All Disclosure and Barring Service (DBS) records will remain confidential and under the control of the Safeguarding Officer and People & Organisational Development Team. Records will not be stored beyond the legally defined period of time in accordance with DBS guidelines.
- 8.5 All data will be stored in line with the General Data Protection Regulations 2018(GDPR) and for the appropriate time period. Data may include contact information, images, records and correspondence.

## 9 Safer Recruitment

- 9.1 LLDC will use the recruitment and selection process to deter and reject unsuitable candidates. DBS checks are required for certain roles.
- 9.2 We will maintain a record of all recruitment checks carried out in line with statutory requirements.
- 9.3 We will ensure that those responsible for recruiting have completed appropriate safer recruitment training. At all times, we will ensure that safer recruitment practices are followed in accordance with our requirements.
- 9.4 For those colleagues and volunteers who have new or historical entries on their DBS that may raise concerns of a safeguarding nature but not exclude them from being able to undertake their role, a risk assessment will be completed and kept on file outlining any measures that will be in place to manage any assessed risk.
- 9.5 Venues: the Park's venues are responsible for recruitment and the business of each venue will determine the level of safeguarding provision required.
- 9.6 Park Security: DBS checks are mandatory for all personnel.
- 9.7 Park Champions: Where Park volunteer roles involve direct working with children or vulnerable adults, volunteers are required to provide a DBS check. All volunteer roles are assigned in pairs to avoid lone working.

## 10 Managing Allegations Against Colleagues and Volunteers

- 10.1 Our aim is to provide a safe environment which secures the wellbeing of children and vulnerable

adults in receipt of a service from our organisation. We do, however, recognise that sometimes allegations of abuse may be made.

- 10.2 We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm or abuse children or vulnerable adults.
- 10.3 We will take all possible steps to safeguard vulnerable adults or children and to ensure that those working for or on behalf of our organisation are safe to work with children and vulnerable adults. We will always ensure that the procedures outlined by **Working Together to Safeguard Children 2018** are adhered to and will seek appropriate advice from the Designated Officer for the Local Authority or Adults Safeguarding Contact for the Local Authority where appropriate.
- 10.4 If an allegation is made or information is received about a colleague (or volunteer) who works with children (both within or outside our organisation):
- a) The colleague receiving the information should inform the DSO and/or the Senior Lead for Safeguarding immediately. This includes concerns relating to agency and supply staff, trainees and volunteers.
  - b) The DSO will conduct a Risk Assessment of the situation and potential issues.
  - c) We may also seek consultation with the LADO where we believe that an individual has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to directly relate to a child.
  - d) Should an allegation be made against the DSO or against a colleague above the level of the DSO, this will be reported to the Senior Safeguarding Lead.
- 10.5 The Designated Safeguarding Officer will seek advice from the Designated Officer for the Local Authority or Adults Safeguarding Contact for the Local Authority where appropriate within one working day. No member of staff will undertake further investigations before receiving further advice.
- a) Any colleague or volunteer who does not feel confident to raise their concerns within the organisation should contact the Designated Officer for the Local Authority or Adults Safeguarding Contact for the Local Authority directly.
  - b) LLDC will refer to the DBS any colleague who has harmed, or poses a risk of harm, to children or vulnerable adults. This referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the Human Resources Department.
- 10.6 The fact that a colleague tenders their resignation or a contractor or volunteer ceases to provide their services will not prevent the investigation of an allegation in line with this Policy.

# 11 Dealing with Concerns of Radicalisation

- 11.1 The duty to protect children, young people and adults from harm extends to protecting them from involvement in groups which set out to radicalise individuals. At LLDC this is more likely to be observed on the Park than in the office spaces, and Park Security are alert to the potential indicators.
- 11.2 Radicalisation refers to the process by which a person comes to support terrorism and forms of violent extremism leading to terrorism.
- 11.3 Within the government's Prevent Strategy, certain areas/public bodies and areas of interest have been identified as potential sites for radicalisation and LLDC have a duty to work in partnership with the regional Prevent co-ordinators, local authorities and the Police to minimise the risks of individuals becoming radicalised. Whilst it is recognised that no single measure will reduce radicalisation, it is believed that the only way is to target potential at risk vulnerable groups and individuals and try to re- assimilate them into society.
- 11.4 We are therefore required to;
- a) Understand and be vigilant about the risks of radicalisation
  - b) Communicate and promote the duty to prevent
  - c) Assess the risks of individuals being drawn into terrorism
  - d) Develop an action plan to reduce the risk
  - e) Train staff to recognise radicalisation and extremism
  - f) Ensure staff understand when and how to make referrals to regional co- coordinators and to channel and refer vulnerable people to channel
  - g) Manage extremist speakers and events
  - h) Manage access to extremist material
  - i) Challenge extremist ideas that promote terrorism
  - j) Maintain records and reports to ensure compliance.
- 11.5 Factors which are considered when determining whether an individual may be vulnerable to involvement with terrorism could include:
- **Identity Crisis** - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.
  - **Personal Crisis** – Family tensions; sense of isolation; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
  - **Personal Circumstances** – poverty, deprivation, local community tensions at home; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
  - **Unmet Aspirations** – Perceptions of injustice; feeling of failure; rejection of civic life.
  - **Criminality** – Victims of hate crime/discrimination. Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups.

- 11.6 Colleagues may become concerned about someone due to changes in behaviour or appearance, with the following possible indicators prompting cause for concern:
- Stopping contact with peers, only interested in contact with members of a particular ideological group;
  - Changes in a habitual style of dress;
  - Condoning of violence in support of an espoused ideology;
  - Quickness to anger, intolerance, close-mindedness;
  - Attitude to women;
  - Change in attitude;
  - Isolation;
  - Physical changes – clothing, tattoos;
  - Overt new religious practices;
  - Accommodation changes – posters etc;
  - Spreading messages and/or extremist views.
- 11.7 There may be many reasons for such changes, which is why a safeguarding approach should be adopted, since this will enable relevant services within and outside LLDC to identify an individual's needs and vulnerabilities. This includes deciding whether the Channel Process may be of benefit to the individual.
- 11.8 Dealing with concerns of radicalisation is set out in the Flowchart at Appendix C.
- 11.9 Anyone concerned that an individual may be/ have become becoming radicalized should contact the Designated Safeguarding Officer, who in turn will speak with relevant persons and authorities.

## 12 Local Authority Contacts

Designated Safeguarding Officers			
LB Newham	Nick Pratt	<a href="mailto:nick.pratt@newham.gov.uk">nick.pratt@newham.gov.uk</a>	0203 3733803
LB Tower Hamlets	LADO	<a href="mailto:LADO@towerhamlets.gov.uk">LADO@towerhamlets.gov.uk</a>	0207 3640677/5290
LB Hackney	LADO	<a href="mailto:LADO@Hackney.gov.uk">LADO@Hackney.gov.uk</a>	0208 3564569/8082
LB Waltham Forest	LADO	<a href="mailto:LADO@walthamforest.gov.uk">LADO@walthamforest.gov.uk</a>	0208 496 3646

Adult Safeguarding Officers			
LB Newham	no named person	0203 3730440	<a href="mailto:Accessto.adultsocialcareteam@newham.gov.uk">Accessto.adultsocialcareteam@newham.gov.uk</a>
LB Tower Hamlets	no named person	0207 3645005	<a href="mailto:adultcare@towerhamlets.gov.uk">adultcare@towerhamlets.gov.uk</a>
LB Hackney	No named person	0208 3565782 Ooh: 0208 3562300	<a href="mailto:adultprotection@hackney.gov.uk">adultprotection@hackney.gov.uk</a>
LB Waltham Forest	No named person	0208 496 3646	<a href="mailto:LADO@walthamforest.gov.uk">LADO@walthamforest.gov.uk</a>

MASH/ Children's Services Details		
LB Newham	0203 3734600/ 02084302000	<a href="mailto:childrenstriagefax@newham.gov.uk">childrenstriagefax@newham.gov.uk</a>
LB Tower Hamlets	0207 3645601/5606	<a href="mailto:Mash@towerhamlets.gov.uk">Mash@towerhamlets.gov.uk</a>
LB Hackney	020 8356 5500 020 8356 2710	MASH@hackney.gov.uk
LB Waltham Forest	0208 496 3646	<a href="mailto:LADO@walthamforest.gov.uk">LADO@walthamforest.gov.uk</a>

LLDC Park Operations Centre		
Park Headquarters (24 hours)	ParkHQControlRoom.uk@equans.com	0300 2012 222

## 13 Modern Slavery

13.1 The LLDC has taken steps to address the risks of slavery and human trafficking in its supply chains pursuant to **section 54 of the Modern Slavery Act 2015**. The LLDC statement can be found at Appendix D.

13.2 Human trafficking is defined as a process that is a combination of three basic components under the **UNHCR (Guidelines 2006, Human trafficking)**:

- 1) Movement (including within the UK)
- 2) Control, through harm/threat of harm or fraud
- 3) For the purpose of exploitation

13.3 Whilst LLDC is neither a first responder or a commercial organisation (as defined by the MSA) we have a duty to work with our partners/suppliers/contractors/operators and the supply chain to minimise/mitigate risk of it existing within.

13.4 **The Palermo Protocol 2000** sets out that the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

13.5 The **Modern Slavery Act 2015** brings together the legislative response to modern slavery. Modern slavery covers human trafficking, slavery, servitude and forced or compulsory labour. The Act references:

- 1) Criminal offences;
- 2) Law enforcement powers in relation to slavery and human trafficking;
- 3) The Independent Anti-Slavery Commissioner;
- 4) Protections for victims of slavery and human trafficking; and
- 5) Transparency in supply chains, which requires businesses above a certain size to report on the steps they are taking to ensure slavery and trafficking does not occur in their supply chain.

13.6 Forms of Modern Slavery;

- **Forced labour** – any work or services which people are forced to do against their will under the threat of some form of punishment.
- **Debt bondage or bonded labour** – the world's most widespread form of slavery, when people borrow money they cannot repay and are required to work to pay off the debt, then losing control over the conditions of both their employment and the debt.
- **Human trafficking**– involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
- **Descent-based slavery** – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.
- **Child slavery** – many people often confuse child slavery with child labour, but

it is much worse. Whilst child labour is harmful for children and hinders their education and development, child slavery occurs when a child is exploited for someone else's gain. It can include child trafficking, child soldiers, child marriage and child domestic slavery.

- **Forced and early marriage** – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.
- Other types include Sexual Exploitation, Criminal Exploitation and Organ Harvesting

- 13.7 The **Care Act 2014** sets out a legal duty for Local Authorities and others to assess adults in need of care and support and meet 'eligible needs' in a way that promotes their wellbeing. It requires Local Authorities and relevant partners (such as colleagues in health, housing and the police etc) to cooperate to safeguard adults in need who are at risk of abuse or neglect. It recognises exploitation, and specifically slavery and human trafficking, as a 'form of abuse and neglect.
- 13.8 Reporting lines under safeguarding Appendix E should be followed and the reporting form at Appendix A completed.
- 13.9 Further Guidance on Modern Slavery can be found on **Victims of Modern Slavery – Frontline staff Guidance V3** and **The National Referral Mechanism Guidance 2016**

## Appendix A Incident report and outcome form for Safeguarding incidents

### Private and Confidential

**All incidents must be reported to the DSO immediately** this is to avoid undue delay in action being taken to protect the child(ren) or adults at risk

Names and contact details of reporter of incident (inc phone number, role within the organisation, relationship to the possible victim)

Names and contact details of possible victim (If they are willing to supply them. If they are not willing, are there any other contact details you can record?)

Name of person completing this form:

Phone number of person completing this form:

Date and time of incident:

Level of risk/harm

Immediate

☐

High

☐

Moderate

☐

Low

☐

Address and location of where incident occurred

Actions taken

Witnessed by

Evidence available? If so what

Known background information/history (if any)

State facts of incident **remember be factual and don't give opinions**

Signed:

Dated:

Once completed please **return immediately to the Designated Safeguarding Officer**, marked private and confidential, at Level 10, 1 Stratford Place, Montfichet Road, London, E20 1EJ email: [safeguarding@londonlegacy.co.uk](mailto:safeguarding@londonlegacy.co.uk)

**FOLLOW UP / Record of Outcome (to be completed by relevant DSO)**

Agencies and persons within involved:

Key Actions taken:

Actions remaining and timescales for resolution:

Outcome of referral:

Issues to be addressed in area/organisation:

Any training/awareness issues arising from this referral:

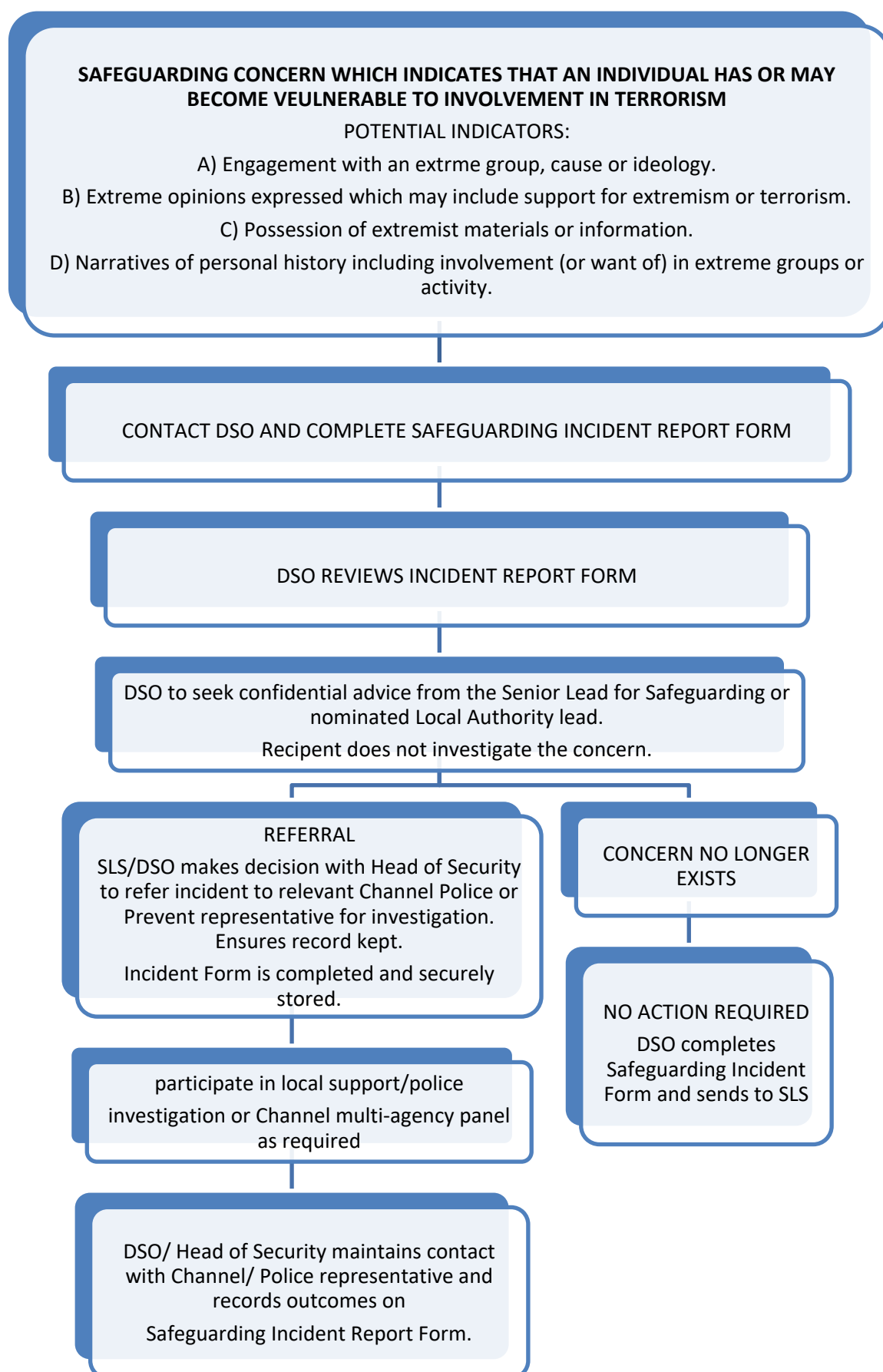
## Appendix B Glossary

<b>Abuse</b>	<p>is a form of maltreatment of a child or adult.</p> <ul style="list-style-type: none"> <li>i. Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm.</li> <li>ii. Adults and children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (including via the internet).</li> <li>iii. They may be abused by an adult or adults, or another child or children.</li> </ul>
<b>Adults</b>	everyone aged 18 and over
<b>Capacity</b>	refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the Mental Capacity Act 2005.
<b>Channel Process</b>	A multi-agency approach to protect people at risk from radicalization through collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to identify and assess individuals at risk of being drawn into terrorism and develop the most appropriate support plan for the individuals concerned.
<b>Child and Vulnerable Persons Criminal Exploitation including County Lines</b>	the use of children and vulnerable persons to conduct illicit activities normally for urban gangs and with relation to county lines to allow them to operate in coastal or suburban areas.
<b>Child protection</b>	activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
<b>Children</b>	everyone under the age of 18.
<b>Cyber Bullying</b>	<p>cyber bullying occurs when someone;</p> <ul style="list-style-type: none"> <li>i. Repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages; uses online forums with the intention of harming; damaging; humiliating or isolating another person.</li> <li>ii. It can also be used to carry out many different types of bullying (such as racist or homophobic bullying and/or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it</li> </ul>
<b>Disclosure and Barring Service (DBS)</b>	Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions each year by processing and issuing DBS checks for England, Wales, the Channel Islands and the Isle of Man. DBS also maintains the Adults' and Children's Barred Lists, and makes considered decisions as to whether an individual should be included on one or both of these lists and barred from engaging in regulated activity.
<b>Discrimination</b>	discrimination is abuse which centers on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act 2010.
<b>Emotional or Psychological Abuse</b>	includes threats of harm or abandonment; deprivation of contact; humiliation; blaming; controlling; intimidation; coercion; harassment; verbal abuse; isolation or withdrawal from services or supportive networks.
<b>Forced Marriage</b>	<p>forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will.</p> <ul style="list-style-type: none"> <li>i. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse.</li> <li>ii. The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry.</li> </ul>

<b>Financial or Material Abuse</b>	including theft; fraud; internet scamming; coercion in relation to an adult's financial affairs or arrangements; including in connection with wills; property; inheritance or financial transactions; or the misuse or misappropriation of property; possessions or benefits.
<b>Gang</b>	<p>The Gangs Working Group describes gangs as:</p> <ul style="list-style-type: none"> <li>i. A relatively durable, predominantly street-based group of young people</li> <li>ii. Young people who see themselves (and are seen by others) as a discernible group</li> <li>iii. Engage in a range of criminal activity and violence</li> <li>iv. Identify with or lay claim over territory</li> <li>v. Have some form of identifying structural feature</li> <li>vi. Conflict with other, similar, gangs.</li> <li>vii. The definition of 'serious youth violence' currently in use by the Metropolitan Police Service is 'Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19.</li> </ul>
<b>Mate</b>	<p>a mate crime as defined by the Safety Net Project is <i>"when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual"</i>.</p> <ul style="list-style-type: none"> <li>i. Mate Crime is carried out by someone the adult knows and often happens in private.</li> <li>ii. In recent years there have been a number of Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.</li> </ul>
<b>Modern Slavery</b>	encompasses slavery; human trafficking; forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce deceive and force individuals into a life of abuse, servitude and inhumane treatment.
<b>Neglect</b>	<p>is a form of abuse and is the persistent failure to meet a child or adult's basic physical and/ or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of material substance abuse. Once a child is born, neglect may involve a parent or carer <i>failing</i> to:</p> <ul style="list-style-type: none"> <li>i. Provide adequate food, clothing or shelter (including exclusion from home or abandonment).</li> <li>ii. Protect a child or adult from physical and emotional harm or danger.</li> <li>iii. Ensure adequate supervision (including the use of inadequate care-givers) or ensure access to appropriate medical care or treatment.</li> <li>iv. It may also include neglect of, or unresponsiveness to, a child or adult's basic emotional needs.</li> </ul>
<b>Organisational Abuse</b>	<p>including neglect and poor care practice within an institution or specific care setting such as a hospital or care home - for example; or in relation to care provided in one's own home.</p> <ul style="list-style-type: none"> <li>i. This may range from one-off incidents to on-going ill-treatment.</li> <li>ii. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</li> </ul>
<b>Physical Abuse</b>	includes hitting; slapping; pushing; kicking; misuse of medication; restraint or inappropriate sanctions.

<b>Radicalisation</b>	<p>The Prevent Duty Guidance defines radicalisation as <i>"the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups"</i>.</p> <ul style="list-style-type: none"> <li>i. The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause.</li> <li>ii. This may be direct through a relationship, or through social media.</li> </ul>
<b>Regulated Activity</b>	certain roles that involve working with children or vulnerable adults, such as teaching and providing care. Individuals on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles.
<b>Safeguarding and promoting the welfare of children and adults</b>	<ul style="list-style-type: none"> <li>i. <i>Protecting</i> children, young people and adults from maltreatment</li> <li>ii. <i>Preventing</i> impairment of children's or adult's health or development</li> <li>iii. <i>Ensuring</i> that children grow up in circumstances consistent with the provision of safe and effective care</li> <li>iv. <i>Taking action</i> to enable all adults and children to have the best outcomes</li> </ul>
<b>Self-neglect</b>	covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
<b>Sexual Abuse</b>	including rape; sexual harassment; inappropriate looking or touching; sexual teasing or innuendo; sexual photography; subjection to pornography or witnessing sexual acts; indecent exposure; sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

## Appendix C Flowchart for Reporting Radicalisation/Extremism Concerns



## Appendix D Modern Slavery and Human Trafficking Statement

### September 2021 London Legacy Development Corporation Modern Slavery and Human Trafficking Statement

This Statement sets out the steps that the London Legacy Development Corporation (LLDC, the Corporation) has taken to address the risks of slavery and human trafficking in our supply chains pursuant to section 54 of the Modern Slavery Act 2015. Our aim is to inform our partners, suppliers, colleagues and the public about LLDC's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains and the steps taken to identify, prevent and mitigate the risks. It outlines the policies and processes we have in place, the areas we have identified as high risk and the actions we have taken to mitigate such risks and the plans we have in place to strengthen our commitment to the Act.

While LLDC is not a "commercial organisation" as defined by the Act, so has no requirement to publish a statement, LLDC recognises that it is good practice to ensure that the Corporation is compliant with the Act.

#### LLDC's structure, business and supply chains

London Legacy Development Corporation is a Mayoral Development Corporation, established on 1 April 2012, under the provisions of the Localism Act 2011, with the vision of creating a dynamic new metropolitan centre for London. LLDC is owned by the Mayor of London and is part of the Greater London Authority (GLA) group.

Our supply chains are generally simple and involve predominantly UK companies. Nevertheless, we do source goods and services from further afield, particularly for construction programmes. We recognise the importance of taking appropriate steps to reduce the risk of modern slavery within our supply chains.

#### LLDC's policies in relation to slavery and human trafficking

The GLA has a Responsible Procurement Policy which LLDC has signed up to and reflects best practice to ensure that procurement activities meet all relevant legislative requirements including the Modern Slavery Act. The policy states that "we are committed to responsible and ethical business practice and expect similar standards from our suppliers and throughout our supply chain. We respect international principles of human rights including, but not limited to, those expressed in the UN Declaration of Human Rights, United Nations Guiding Principles, and the UK Government Modern Slavery Act 2015; and the relevant legislation in all of the countries where we procure our goods and services." The policy is available here [\[link\]](#).

As part of LLDC's standard Selection Questionnaire for OJEU procurements, prospective suppliers who are relevant commercial organisations as defined in the Act are asked to demonstrate compliance with the Act to LLDC.

LLDC has updated its Whistle Blowing Policy to include modern slavery and people trafficking as a matter regarded as malpractice.

LLDC has worked with the London Stadium operator, LS185, which is owned by LLDC, to develop their own Modern Slavery statement, available here [\[link\]](#). The Modern Slavery Statement also covers subsidiaries in the LLDC Group: Stratford East London Holdings Ltd, Stratford Waterfront Management Company Ltd and Stratford East London Developments Ltd.

## **Risk analysis on where there is a risk of slavery and human trafficking taking place**

The principal categories that LLDC deems as carrying material risks of human rights abuses are construction, catering and facilities management services such as cleaning and stewarding and security services. Further risk and opportunity assessments to identify other contracts and areas of spend, where there may be a high risk, will be undertaken in the coming year.

## **LLDC's due diligence processes in relation to slavery and human trafficking in its business and supply chains**

LLDC continues to undertake due diligence into its supply chain processes to address the risk of modern slavery, human trafficking, forced and bonded labour and other human rights risks in the supply chain. Progress has been made with our major construction contracts on East Bank and as a priority in the coming year, attention will be paid to modern slavery risks in catering, facilities management services and stewarding, wherever lower pay is prevalent and where demand for unskilled labour in the supply chain may be met by third party agencies. Contractors will be encouraged to recruit directly wherever possible and to undertake regular audits of third-party agencies to check for the signs of human rights abuse.

LLDC's standard contracts include clauses that oblige contractors to comply with the Modern Slavery Act. This text is from LLDC's standard low value goods and services contract: "The Supplier shall in the performance of the Contract (at no additional cost to the Legacy Corporation) comply, and ensure that any sub-contractors comply, in all respects with relevant and binding UK laws or any other regulation or by-law (including, without limitation, with the Modern Slavery Act 2015 and the Anti-Slavery Policy) from time to time in force which is or may become applicable during the period the Contract is in force.

LLDC has implemented changes to strengthen LLDC's NEC3 contracts, including on East Bank, in relation to compliance by the contractor and their sub-contractors with the Modern Slavery Act and ensure that contractors meet the requirements of a Certified Ethical Labour Scheme. The relevant clauses have been inserted into new contracts and bidders' Modern Slavery Statements are assessed as part of East Bank procurements. LLDC's Project Management Partner is responsible for ensuring that contractors are monitored in implementing these requirements. LLDC continues to work in partnership with GLA responsible procurement colleagues and have reported that other organisations are considering using similar contractual clauses as LLDC to embed the certified labour scheme in supply chains.

LLDC contributed to the GLA Group's brief to procure an assurance provider to work across the group to develop a robust assurance process for the Group, and sat on the evaluation panel to select the successful provider. The provider has developed a handbook for use with key suppliers to ensure Modern Slavery risks are being mitigated in high-risk areas e.g. construction sites, cleaning workforce, track labour, and other sectors to include on-the-ground, empirical evidence of modern slavery prevention measures. Recommendations in the handbook have informed the action plan below.

LLDC has signed up to the Gangmasters and Labour Abuse Authority's (GLAA) Construction Protocol. The GLAA is an arm's length body of the Home Office who are authorised to investigate and prosecute offences of labour market exploitation. Joining gives LLDC access to a network, best practice and expert knowledge.

## **Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate**

The annual exercise we undertake with employers on the Park in relation to payment of the London Living Wage and the non-exploitative use of zero hours contracts is now extended to include questions about the businesses compliance with the Modern Slavery Act and their related due diligence work with supply chains. The responses are analysed and further information or monitoring visits will be requested by LLDC where required.

Mace, LLDC's East Bank project management partner's approach to monitoring modern slavery compliance in the supply chain includes ensuring that contactors sign up to a certified ethical labour scheme (e.g. Clearview and Hope for Justice) and join SEDEX, who specialise in mapping supply chains and identifying risks of where modern slavery is most likely. Mace report the status of all on site contractors at East Bank in relation to Modern Slavery to the Modern Slavery Group: The assessment by SEDEX has found that all of the contractors on site have a low risk rating for modern slavery so no further investigations are recommended. On site awareness raising and communications around modern slavery have been implemented at Stratford Waterfront.

### **Training**

Key employees in the Programme Management Office and Procurement team have received guidance from the GLA Group's Responsible Procurement team who have expertise in this field. Key employees have also joined webinars on the subject. Training on Modern Slavery for relevant employee was undertaken in 2018/19 and a Modern Slavery update was given to an all colleagues briefing, a further briefing will be given in 2021 along with a roll out of the emerging Home office e-learning tool for public sector procurement.

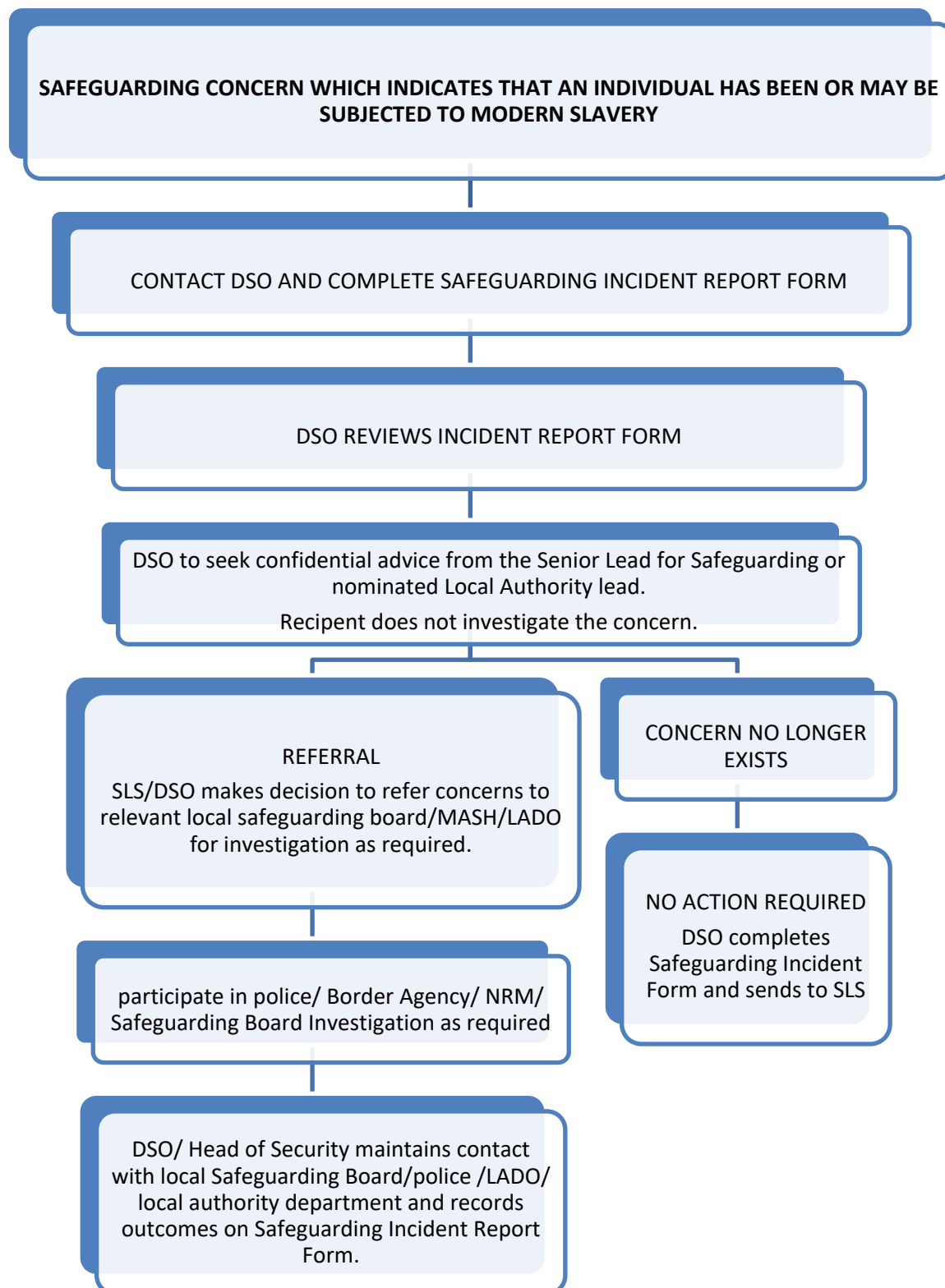
### **Our key goals**

LLDC reconfirms its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working in them.

We will continue to work with our partners and suppliers to undertake supply chain due diligence and mitigate the risks to human rights in our supply chains. We will also ensure that these issues are considered as part of transition plans setting out how LLDC's functions will be undertaken when the Corporation comes to the end of its operations. As LLDC acquires knowledge and develops capability across all higher-risk spend categories, the intention is to codify and communicate for wider use in the GLA Group those due diligence processes that are found to be the most successful.

This Statement was approved by LLDC's Board in September 2021

## Appendix E Flowchart for Reporting Modern Slavery and Human Trafficking Concerns



## Appendix F: Legislation Framework

This policy is based on the Department for Education's statutory guidance Working Together to Safeguard Children 2018. We comply with the procedures set out by our local safeguarding children and adults board.

The following legislation/guidance also inform this policy:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- The Care Act 2014, which provides a framework for the care and protection of adults.
- The Rehabilitation of Offenders Act 1974
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009 and Childcare Act 2006
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- What to do if you're worried a child is being abused'. DfE (March 2015)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015)
- The Revised Prevent duty guidance: Guidance for specified authorities in England and Wales on the duty in the Counterterrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism
- Child Sexual Exploitation: A definition and guide for practitioners. local leaders and decision makers DfE (2017)
- London Safeguarding Children Procedures (updated on a 6 month basis)
- Keeping Children Safe in Education 2018
- Newham Safeguarding Children Board procedures.
- Modern Slavery Act 2015
- Victims of Modern Slavery – Frontline colleagues Guidance V3
- The National Referral Mechanism Guidance 2016
- The Anti-social Behaviour, Crime and Policing Act 2014
- Criminal exploitation of children and vulnerable adults (July 2017)
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018

## Appendix G: Event Safeguarding Assessment Form

This form must be used when LLDC is planning an activity for which it is directly responsible. It should be completed and submitted no later than one month prior to the start of the planned activity to the LLDC DSO (Peter Tudor/Tony Tolley) for review.

Names and contact details of person responsible for the activity	
Activity – description	
Activity – location (eg: office, Park, venue)	
Date and time of activity:	
Do the participants fall within the definition of the groups to which the LLDC Safeguarding policy applies (eg: children under the age of 18, vulnerable adults)? Specify ages if known:	
Does any element of the activity take place online?	
Outline Safeguarding risks and mitigations planned (add rows if required):	
<b>Risk</b>	<b>Mitigation</b>
Signed:	
Dated:	

**FOLLOW UP / Record of Outcome (to be completed by relevant DSO)**

Name:

Form reviewed (date):

Recommendations:

Actions remaining and timescales for resolution:

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**Subject:** Health, Safety and Security Risk Update  
**Date:** 14 December 2022  
**Report to:** Health, Safety and Security Committee  
**Report of:** Mark Camley, Executive Director of Park Operations and Venues

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**This report will be considered in public**

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## **1. SUMMARY**

- 1.1. This paper is intended to update the Health, Safety and Security Committee on major health, safety and security risks identified by LLDC.
- 1.2. Further information on the risks contained this report, including a heat map and risk register, can be found in a separate item on Part 2 of the agenda (contains exempt information). The information is exempt by virtue of part 1, paragraphs 3 and 7 of Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of a person or authority, and information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## **2. RECOMMENDATION**

- 2.1 **The Chair, following consultation with available Members of the Health, Safety and Security Committee Advisory Panel, is asked to note this report.**

## **3. BACKGROUND**

- 3.1. The Health, Safety and Security risk register and heatmap were reviewed by the Committee at its meeting of 29 June 2022. The Committee was presented with the outcome of a full, 'zero-based', review of the risk register, with a focus on ensuring all major risks are covered and the residual likelihood and impact ratings are accurate. The outcome of this review was that: new risks were identified; risks closed; risks merged with other risks or were disaggregated; risks have been re-focused; and risk ratings have changed.
- 3.2. The outcome of the review was well received by the Committee, which also asked that LLDC consider a new risk related to cyber crime impacting on systems on the Park and venues.

## **4. FINANCIAL IMPLICATIONS**

- 4.1. There are no new funding implications of the report.

## **5. LEGAL IMPLCATIONS**

- 5.1. There are no legal implications of the review.

## **6. PRIORITY THEMES**

- 6.1. The report has no implications for LLDC's priority themes.

## 7. APPENDICES

7.1. There are no appendices to this report.

<b>List of Background Papers:</b>
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Papers for previous Committee meetings
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**Report originator(s):**  
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