



## LLDC – Safeguarding Policy

May 2026

### 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/structure                                                                                                                   | Peter Tudor        |
| V.17.0             | May 26  | Removed Modern Slavery and Radicaliasation sections. Updated legislation. Amendments made to reflect universal understanding of safeguarding | Nick Morris        |

### 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 |
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| LLDC Board                  | Approved via minutes                    | N            | 10/06/26 |

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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 and LLDC off site properties.
- 1.2 In this policy Safeguarding refers to “children” (anyone aged under 18) and “vulnerable adults”, as per the Care Act 2014 (Those over 18 who have care and support needs, are at risk of abuse or neglect, and are unable to protect themselves because of those needs).
- 1.3 Whilst this policy is about Safeguarding, as defined by Keeping Children Safe in Education 2026 and the Care Act 2014, LLDC will take steps to support members of the public in the park that are vulnerable due to other factors, such as intoxication and mental illness.
- 1.4 Whilst there are specific lead officers identified within LLDC, it is everyone’s responsibility to safeguard and protect children and vulnerable adults.
- 1.5 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.
- 1.6 Safeguarding issues are likely to come to light through one of four main methods: direct observation, disclosure from a child or vulnerable adult, observation by a third party or referral from an external Public, Statutory or Regulatory Body (PSRB).
- 1.7 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.
- 1.8 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 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.
- 1.9 The process to report a concern is outlined at Section 3.

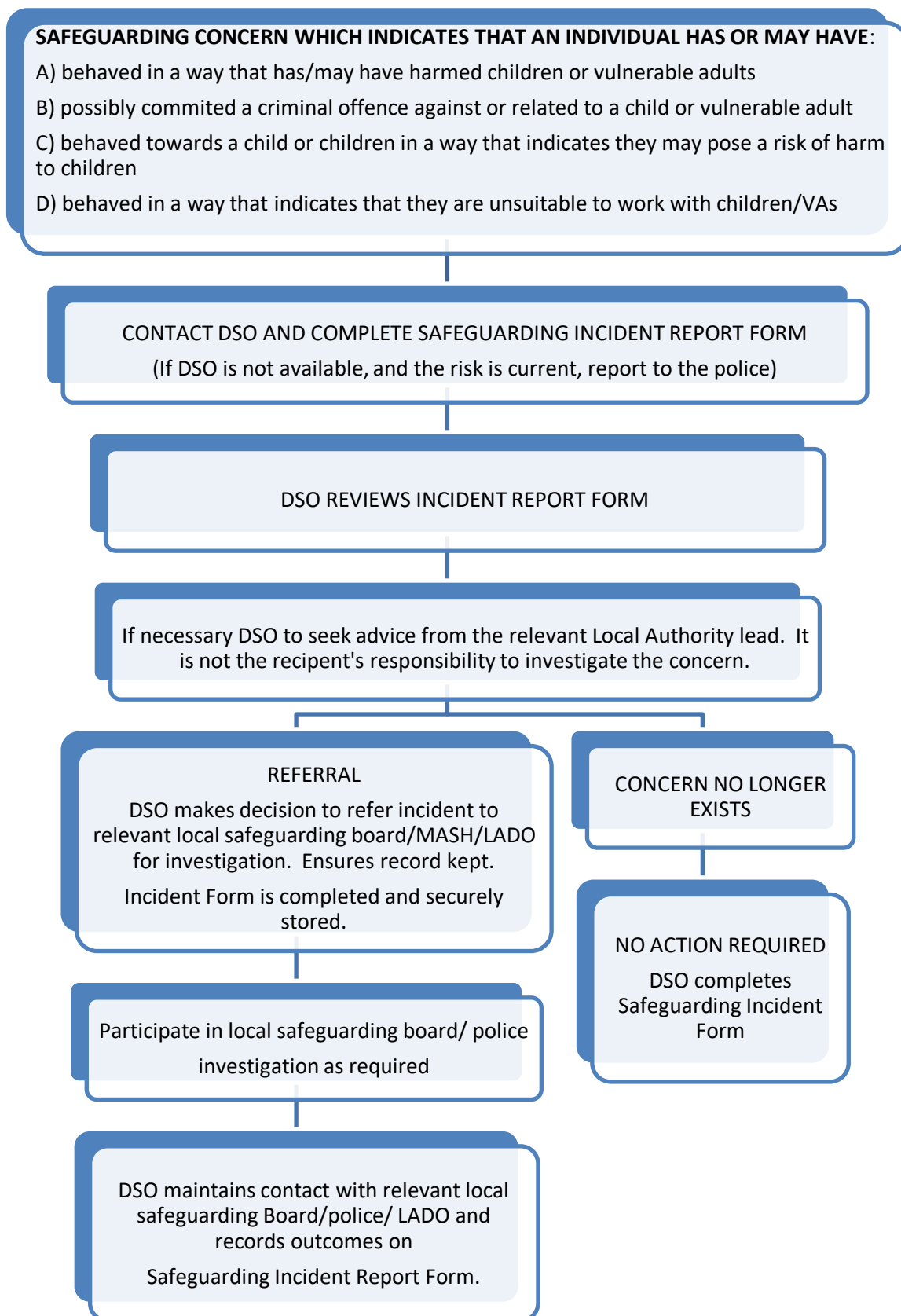
## **2. Safeguarding at LLDC**

- 2.1 The purpose of LLDC's safeguarding policy is to ensure every child and vulnerable adult is safe and protected from harm at the Park and LLDC property.
- 2.2 LLDC's primary safeguarding responsibility is to ensure that their venues (The London Aquatics Centre, Copper Box Arena, ArcelorMittal Orbit, and 3 Mills Studios) have robust safeguarding procedures in place.
- 2.3 Most events held at the Park are managed by external providers. LLDC will ensure that any event for children or vulnerable adults has safeguarding as part of their risk assessment.
- 2.4 Any event for children, or vulnerable adults, run by LLDC will have safeguarding included in the risk assessment. The LLDC DSO will be informed of these events and will be responsible for reviewing the safeguarding element of the risk assessment.
- 2.5 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.
- 2.6 LLDC recognises the contribution it can make to protecting vulnerable 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.
- 2.7 This means we will always work to:
  - Protect children and vulnerable adults from maltreatment.
  - Prevent impairment to children and vulnerable adults' health or development.
  - Identify children and vulnerable adults who may be in need of extra help.
  - Ensure that our services assist children and vulnerable adults to be safe.

- 2.8 We will do this by ensuring that 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** 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
- 2.9 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. 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.
- 2.10 We recognise that children 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 child's disability.
  - 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.
- 2.11 Effective working relationships are maintained with colleagues from other agencies in line with Working Together to Safeguard Children 2026, The Care Act 2014, and Newham Safeguarding Children Partnership 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 using the form at Appendix A.
- 3.3 In the case of a disclosure from someone over the age of eighteen who is not a vulnerable adult 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 confidentiality
  - Make it clear that you are taking them seriously
  - Allow the person to continue at his / her own pace
  - **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).
  - not ask questions about what is being disclosed.
  - **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 individual 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;
  - **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;
  - 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

- LLDC Board
- Designated Safeguarding Officer (DSO)      ○ Nick Morris
- Deputy Designated Safeguarding Officer (D/DSO)      ○ John Walker
- POD Lead for Safeguarding      ○ Debbie Wooldridge

### 4.2 Roles and Responsibilities

| Role                                                                                                                                                           | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LLDC Board                                                                                                                                                     | <ul style="list-style-type: none"> <li>○ The safeguarding policy is in place, is reviewed annually, and is available to the public.</li> <li>○ Ensure a senior colleague from LLDC is designated to take the lead responsibility 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 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 LLDC staff 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 2026.</li> <li>○ Provide advice and support to other colleagues. Any concern for a child/vulnerable 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 records ensuring that they are kept confidential and stored securely.</li> <li>○ Ensure that all colleagues 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 colleagues undertake appropriate safeguarding training relevant to their role.</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 staff where their role involves working with children.</li> <li>○ With the POD lead for safeguarding ensure that adequate up to date and informed procedures and processes are in place for dealing with allegations against members of staff and volunteers who work with children in line with statutory guidance.</li> <li>○ With the POD 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 Appendix 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 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**

- 5.1 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.
- 5.2 Colleagues likely to be in contact with children and vulnerable adults will receive safeguarding training during their induction period..
- 5.3 Park Security, idverdse, 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 LLDC EVENTS: LLDC occasionally delivers its own events on the Park and in other locations. 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.

## 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. All 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.
- 6.2 **PARK VENUES:** LLDC has appointed operators to manage the ArcelorMittal Orbit, 3 Mills, Copper Box Arena, London Aquatics Centre, Riverside East, 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 are 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. DBS checks are required for relevant roles.
- 6.4 **EVENT OWNERS:** the majority of events taking place at the Park are organised 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, including safeguarding, will be undertaken by the responsible LLDC Event Manager for review by the DSO.
- 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 Records and Information Sharing**

- 7.1 Colleagues concerned about the welfare or safety of any child or vulnerable adult at LLDC must record their concern through the agreed reporting procedure without delay.
- 7.2 Information recorded will be kept electronically and will be the responsibility of the DSO/HR.
- 7.3 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**.
- 7.4 All Disclosure and Barring Service (DBS) records will remain confidential and under the control of People & Organisational Development Team.
- 7.5 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.

## **8 Safer Recruitment**

- 8.1 LLDC will use the recruitment and selection process to deter and reject unsuitable candidates. DBS checks are required for certain roles.
- 8.2 We will maintain a record of all recruitment checks carried out in line with statutory requirements.
- 8.3 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.
- 8.4 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.
- 8.5 Venues: the Park's venues are responsible for recruitment and the business of each venue will determine the level of safeguarding provision required.
- 8.6 Park Security: DBS checks are mandatory for all contracted personnel.
- 8.7 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.

## **9 Managing Allegations Against Colleagues and Volunteers**

- 9.1 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. We recognise that allegations, when they occur, are distressing and difficult for all concerned.
- 9.2 Any allegations against LLDC staff or volunteers must be reported to HR who will carry out a risk assessment and make a decision regarding a referral to the DBS. HR should consult with the DSL as part of this process.

## 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, age 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<br><div style="display: flex; justify-content: space-around;"> <div>Immediate<br/><input type="checkbox"/></div> <div>High<br/><input type="checkbox"/></div> <div>Moderate<br/><input type="checkbox"/></div> <div>Low<br/><input type="checkbox"/></div> </div> |
| 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 9, 5 Endeavour Square, International Quarter, London, E20 5NJ email: safetyandsecurity@londonlegacy.co.uk

**FOLLOW UP / Record of Outcome (to be completed by 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: Legislation Framework

This policy is based on the Department for Education's statutory guidance Working Together to Safeguard Children 2026. We comply with the procedures set out by our local safeguarding children and adults board.

The following legislation/guidance also inform this policy:

### Core Children's Legislation

- Children Act 1989
- Children Act 2004

### Adults at Risk / Adult Safeguarding

- Care Act 2014
- Mental Capacity Act 2005
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- Anti-Social Behaviour, Crime and Policing Act 2014

### Criminal, Sexual & Protection Legislation

- Rehabilitation of Offenders Act 1974
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006 (inc. Schedule 4)

### Equality & Employment-Linked Legislation

- Equality Act 2010
- Childcare Act 2006
- Childcare (Disqualification) Regulations 2009
- Childcare Disqualification & Early Years Amendment Regulations 2018

### Modern Slavery Legislation & Current Guidance

- Modern Slavery Act 2015
- Modern Slavery Statutory Guidance (Version 4.5, 2026)
- National Referral Mechanism (NRM) Guidance – Adults (Updated Feb 2026)

### Counter-Terrorism & Extremism

- Revised Prevent Duty Guidance (Counter-Terrorism and Security Act 2015)

### National Statutory Safeguarding Guidance

- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education (latest version 2025/2026)

### Specialist Guidance

- Mandatory Reporting of Female Genital Mutilation – Procedural Information (2015)
- Criminal Exploitation of Children & Vulnerable Adults: County Lines Guidance (2017)
- London Safeguarding Children Procedures (updated every 6 months)