



**POLICY AND PROCEDURES FOR SAFEGUARDING PARTICIPANTS IN GOLF FROM
HARASSMENT, ABUSE AND POOR PRACTICE**

(Version July 2024)

Professional Golfers Association of South Africa

Policy and Procedures for Safeguarding Participants in Golf from Harassment, Abuse and Poor Practice

Introduction

This Policy and Procedures for Safeguarding participants in golf from Harassment, Abuse and Poor Practice is a stand-alone document for the PGA of South Africa Membership.

The GolfRSA Safeguarding Policy and Procedures document is a parallel document that covers the areas that GolfRSA assume responsibility for. The GolfRSA policy was effective as of 1 September 2022 and was updated in January 2024.

This document consists of four parts.

- Part A: PGA of South Africa Safeguarding Policy Statement
- Part B: PGA of South Africa Safe Recruitment Policy & Procedures
- Part C: PGA of South Africa Safe Golf Policy & Procedures
- Part D: PGA of South Africa Reporting Safeguarding Concerns Policy & Procedures
- Appendix A: General Code of Conduct

PART A: PGA OF SOUTH AFRICA SAFEGUARDING POLICY STATEMENT

1. INTRODUCTION

- 1.1. Safeguarding is considered to be the responsibility of organisations to make sure their staff, volunteers, operations and programmes do no harm to children or vulnerable adults, or expose them to harassment, abuse or exploitation. It is, however, increasingly becoming best practice to think about how organisations can safeguard everyone in their organisations at all times, including protecting staff and volunteers from inappropriate behaviour such as bullying and harassment.
- 1.2. Everyone connected to the sport of golf should know how to keep children and adults safe. They should have appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to do this.
- 1.3. The Professional Golfers Association of South Africa (PGASA) is committed to the safeguarding of and the protection of all who participate in the sport of golf from harassment and abuse and to ensure that all participants are treated with respect and dignity.
- 1.4. The PGASA recognises that everyone has the right to participate in the sport of golf in an environment free from non-accidental harm irrespective of their race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth or athletic ability.
- 1.5. The PGASA recognises that the welfare of all who take part in golf regardless of their role is important and put the safety and well-being of all participants at the center of everything.
- 1.6. The PGASA recognises that whilst any participant can be subjected to harassment and abuse, certain groups may be more vulnerable to harassment and abuse including but not limited to:
 - 1.6.1. Children;
 - 1.6.2. Young Adults;
 - 1.6.3. People with a Mental and/or a Physical Disability;
 - 1.6.4. Competitive Golfers;
 - 1.6.5. Women;
 - 1.6.6. Elderly Persons; and
 - 1.6.7. Other Vulnerable Adults.
- 1.7. The PGASA is committed to implementing robust procedures to, within the ambit of the PGASA sphere of influence, safeguard and protect all participants in golf including procedures to address the risks associated with specific vulnerable groups.
- 1.8. The PGASA recognises that the prevention of harassment and abuse in sport requires a systematic and coordinated approach both nationally and internationally. This includes working with GolfRSA and globally recognized PGAs to safeguard participants in the sport of golf.

- 1.9. The PGASA recognises that the effectiveness of safeguards is dependent on ensuring PGASA Members, golfers and other participants are involved and engaged and receive appropriate training and support.

2. BACKGROUND

- 2.1. The Constitution of the Republic of South Africa (1996) includes a Bill of Rights which is a cornerstone of democracy in South Africa. It enshrines the rights of all people in South Africa and affirms the democratic values of human dignity, equality and freedom. The Bill of Rights states that you cannot unfairly discriminate directly or indirectly against anyone on one or more grounds, including race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth. The Bill of Rights recognises that everyone has inherent dignity and the right to have their dignity respected and protected. That everyone has the right to be free from all forms of violence from either public or private sources; not to be treated or punished in a cruel, inhuman or degrading way, and that everyone has the right to bodily and psychological integrity, which includes the right to security in and control over their body.
- 2.2. South Africa ratified the United Nations Convention on the Rights of the Child on 16 June 1995. The rights of the child are included in the Bill of Rights of the Constitution of the Republic of South Africa (1996). The Bill of Rights states that “A child’s best interests are of paramount importance in every matter concerning the child.” Included in the rights of the child is to be protected from maltreatment, neglect, abuse or degradation.
- 2.3. The PGASA is recognised by GolfRSA as the Professional Association responsible for the creation and implementation of the coaching standards along with the Association responsible for the education of PGA Professionals within Southern Africa. The PGASA is also recognised by the Alliance of Global PGAs as the PGA responsible for the protection of the PGA trademark within sub-Saharan Africa and for the growth of the PGA Professional within this demarcated area.
- 2.4. GolfRSA is the recognised national sports federation for the sport and recreational activities of golf in South Africa as defined in the National Sport and Recreation Act, 1998 (Act No.110 of 1998) as amended and is recognised as the sole governing body of golf in the Republic in terms of the constitution of the SASCOG.
- 2.5. GolfRSA is responsible for safety in the sport of golf as set out in the National Sport and Recreation Act, 1998 (Act No.110 of 1998) as amended, clause 6.1 which reads “National Sports Federations must assume full responsibility for safety issues within their sport and recreation disciplines.”
- 2.6. The Children's Act 38 of 2005 as amended requires a person who has no parental responsibilities and rights in respect of a child but who voluntarily cares for the child either indefinitely, temporarily or partially, including a care-giver who otherwise has no parental responsibilities and rights in respect of a child, must, whilst the child is in that person's care:
 - 2.6.1. safeguard the child's health, well-being and development; and
 - 2.6.2. protect the child from maltreatment, abuse, neglect, degradation, discrimination, exploitation, and any other physical, emotional or mental harm or hazards.

- 2.7. Forms of harassment and abuse take place worldwide in all cultures and environments. Evidence of recent and non-recent incidents of harassment and abuse indicate it occurs at all levels of sport.
- 2.8. Although any participant in sport can experience harassment or abuse, sport-based research confirms that athletes are particularly at risk and some groups are more vulnerable than others. This includes elite athletes and athletes with a disability, especially if they are children or young adults.
- 2.9. The risk of harassment and abuse increases when there is a lack of protective measures in place that may mean that those who could have the motivation to harass or abuse can do so without restriction.
- 2.10. Harassment and abuse can have significant long-term negative impacts on athlete participation and performance as well as general health and well-being, particularly if the athlete has not been able to disclose their experiences or access support.
- 2.11. All sports organisations have an important leadership role in embedding a no-tolerance approach towards all forms of harassment and abuse. The International Olympic Committee (IOC) Consensus Statement: Harassment and Abuse in Sport (2016) highlights that “It is incumbent upon all stakeholders in sport both to adopt general principles for safe sport (...) and to implement and monitor policies and procedures for safe sport (...) which state that: all athletes have a right to be treated with respect, protected from non-accidental violence (...)”.
- 2.12. The IOC Basic Universal Principles of Good Governance encompass safeguarding and makes it compulsory for organisations that belong to the Olympic movement to adopt these principles, implement relevant measures and monitor compliance.
- 2.13. Clause 10.2.3 of the PGASA Memorandum of Incorporation enables the Association to ‘make and amend Regulations to manage the affairs of the Association including the Regulations and all other matters which the Board shall consider necessary or desirable for the proper and effective management of the commercial and professional affairs of the Association; all such regulations as amended from time to time constitute the Regulations.
- 2.14. The Code of Ethics as defined in the PGASA Memorandum of Incorporation enables the Association to outline fundamental principles, the responsibility of a member and the disciplinary procedures for a breach of the Code of Ethics and associated Regulations.

3. DEFINITIONS

The following definitions are used in these policies and procedures:

- 3.1. **Harassment** is defined by the unwanted nature of the action, which could include attention or the provision of items. It is for any given individual to determine what they consider to be acceptable and what they regard as offensive.

The Protection from Harassment Act 2010, defines harassment as directly or indirectly engaging in conduct that the respondent knows or ought to know;

- 3.1.1. causes harm or inspires the reasonable belief that harm may be caused to the complainant or a related person by unreasonably,

- 3.1.2. following, watching, pursuing or accosting of the complainant or a related person, or loitering outside of or near the building or place where the complainant or a related person resides, works, carries on business, studies or happens to be;
 - 3.1.3. engaging in verbal, electronic or any other communication aimed at the complainant or a related person, by any means, whether or not conversation ensues; or
 - 3.1.4. sending, delivering or causing the delivery of letters, telegrams, packages, facsimiles, electronic mail or other objects to the complainant or a related person or leaving them where they will be found by, given to, or brought to the attention of, the complainant or a related person; or
 - 3.1.5. amounts to sexual harassment of the complainant or a related person.
- 3.2. **Sexual harassment** means any unwanted and unwelcome conduct of a sexual nature, whether verbal, non-verbal or physical. Sexual harassment can take the form of sexual abuse.
- 3.3. **Abuse** can be expressed in four forms which may occur in combination or in isolation.
- 3.3.1. psychological abuse;
 - 3.3.2. physical abuse;
 - 3.3.3. sexual abuse,
 - 3.3.4. neglect.
- 3.4. **Psychological abuse** means any unwelcome act including confinement, isolation, verbal assault, humiliation, intimidation, infantilising, or any other treatment which may diminish the sense of identity, dignity, and self-worth.
- 3.5. **Physical abuse** means any deliberate and unwelcome act – such as for example punching, beating, kicking, biting and burning – that causes physical trauma or injury. Such acts can also consist of forced or inappropriate physical activity (e.g., age, or physique, inappropriate training loads, when injured or in pain), forced alcohol consumption, or forced doping practices.
- 3.6. **Sexual abuse** means any conduct of a sexual nature, whether non-contact, contact or penetrative, where consent is coerced/manipulated or is not or cannot be given.
- 3.7. **Neglect** means the failure of a coach or another person with a duty of care towards the athlete to provide a minimum level of care to the athlete, which is causing harm, allowing harm to be caused, or creating an imminent danger of harm.
- 3.8. Harassment and abuse can be based on any grounds including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age disability, socio-economic status and athletic ability. It can include a once-off incident or a series of incidents. It may be in person or online. Harassment may be deliberate, unsolicited and coercive. Harassment and abuse often result from an abuse of authority, meaning the improper use of a position of influence, power or authority by an individual against another person.

- 3.9. **Regulated activity** within the context of this policy is defined as regular contact with children, young adults, persons with a mental disability or other adults who may be vulnerable to harassment and abuse.
- 3.10. **Regular contact** is defined as more than once per month.
- 3.11. **Children** are defined as young persons under 18 years of age and are protected under the United Nations Convention on the Rights of the Child which has been adopted by 197 nations.
- 3.12. **Young Adults** are young persons over 18 years of age transitioning from childhood to adulthood. With limited life experience they may not have developed resilience and may be more at risk of exploitation, harm or abuse.
- 3.13. **Person with a Mental Disability** can be a child under 18 years of age or an adult over 18 years of age who is, or may be, in need of services by reason of mental disability.
- 3.14. **Person with a Physical Disability** can be a child under 18 years of age or an adult over 18 years of age who is, or may be, or might not be, in need of services by reason of physical disability.
- 3.15. **Vulnerable Adult** is any person aged 18 or over who is, or may be, in need of services by reason of disability, age or illness, and who is, or may be, unable to take care of themselves, or is a person over 18 years of age who is unable to protect themselves against significant harassment, abuse or exploitation related to their athletic ability, race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language or birth.
- 3.16. **Members** are all members of the PGASA.
- 3.17. **Associates within the Pathway to Membership Program (Associates)** are not yet Member's of the Association as they are still completing their education and practical components to meet the minimum requirement for Membership but at all times are expected to abide by the regulations as if they were a Member.

4. PURPOSE

- 4.1. The purpose of the PGASA Safeguarding Policy is to ensure that golfers and others taking part in golf can do so without fear of harassment or abuse. The key objectives of the policy are to:
 - 4.1.1. Ensure every PGASA Member and Associate understands that all forms of harassment and abuse are unacceptable and will not be tolerated.
 - 4.1.2. Enable anyone who has witnessed or experienced harassment or abuse within golf to report the incident without fear of victimisation or retaliation.
 - 4.1.3. Ensure an appropriate and co-ordinated response to any incidents of harassment or abuse within or connected to participation in golf.
 - 4.1.4. Implement effective measures that minimise the likelihood of incidents of harassment and abuse from arising.

5. SCOPE

- 5.1. The PGASA Safeguarding Policy applies to all Members and Associates of the PGASA and any individuals acting on behalf of the PGASA such as, without limitation, directors, officials, administrators and service providers whether employed, contracted or voluntary.
- 5.2. The PGASA Safeguarding Policy applies specifically to any incidents of harassment and abuse that occur through the actions of any person lawfully representing or acting on behalf of the PGASA Membership.
- 5.3. The PGASA will implement safeguards aimed at protecting all participants in golf from harassment and abuse irrespective of their race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language, birth or athletic ability.
- 5.4. The PGASA recognises that in all matters concerning the care, protection and well-being of a child, the standard that the child's best interest is of paramount importance, must be applied. Children are defined as young persons under 18 years of age and are protected under the United Nations Convention on the Rights of the Child and the Constitution of South Africa. The PGASA will implement safeguards specifically aimed at protecting all children participating in golf.
- 5.5. Any incidents of harassment or abuse that are perpetrated against a child must be reported to the relevant Child Protection Authorities (South African Police Service (SAPS), Department of Social Development, Registered Child Protection Agency) in accordance with the Children's Act 38 of 2005 as amended and the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007 as amended.
- 5.6. The PGASA recognises that children and adults may participate in golf activity, who are, or may be, in need of services by reason of mental or other disability, age or illness, and who are, or may be, unable to take care of themselves, or unable to protect themselves against significant harm, abuse or exploitation. The PGASA will implement safeguards specifically aimed at safeguarding children and adults participating in the sport and recreational activities of golf in need of care and support.
- 5.7. Any incidents of harassment or abuse that are perpetrated against a child or adult with a mental disability must be reported to the relevant Authorities.
- 5.8. The PGASA policy and procedures are applicable to all levels of the sport and provides a framework for any person representing or acting on behalf of the PGASA to meet their duty of care towards all who participate in the sport regardless of whether they are a competitive or recreational golfer. The policy is mandatory for all PGASA Staff, Members and Associates.
- 5.9. This policy is effective as of 1 November 2021. The policy was amended and made effective as of 29 July 2024.

6. PGASA SAFEGUARDING POLICY DOCUMENT

- 6.1. The purpose of the PGASA's Safeguarding Policy is to ensure that those taking part in golf can do without fear of harassment or abuse. The key objectives of the PGASA's policies are to:
 - 6.1.1. Assist in ensuring that everyone in **GOLF** understands that all forms of harassment and abuse are unacceptable and will not be tolerated.
 - 6.1.2. Assist in ensuring that anyone who has witnessed or experienced harassment or abuse within golf, has the ability to report the incident without fear of victimisation or retaliation.
 - 6.1.3. Assist in ensuring that an appropriate and co-ordinated response to any incidents of harassment or abuse within or connected to participation in golf, irrespective of whether they arise at local, national or international level.
 - 6.1.4. Implement effective measures that minimise the likelihood of incidents of harassment and abuse arising in golf.
 - 6.1.5. Assist in ensuring that all reasonable steps are taken during the recruitment of staff and volunteers to prevent unsuitable individuals from working for or being Members of the PGASA.
- 6.2. The PGASA's Safeguarding policy and procedures set out the minimum standards that Members and Associates should apply.
- 6.3. The safety and welfare of children and adults should be a priority for all Members and Associates.

7. PGASA MEMBER AND ASSOCIATES ROLES AND RESPONSIBILITIES

- 7.1. All PGASA Members and Associates must comply with the PGASA and GolfRSA safeguarding policy, procedures and codes of conduct and specifically not engage in, allow, condone, or ignore incidents of harassment and abuse and be supportive of other participants who report concerns.
- 7.2. Any PGASA Member or Associate who has reason to believe that another golfer has or is experiencing harassment and abuse connected to their role in the sport has a duty to report it to the PGASA and/or GolfRSA.
- 7.3. Failure to comply with the policy and procedures will be investigated and may ultimately result in disciplinary action against the individuals concerned.
- 7.4. All PGASA Members and Associates who provide services to children and adults have a common law duty of care to take such steps that, in the circumstances of a golf club/facility, are reasonable to ensure the safety and welfare of both children and adults.

8. MONITORING AND REVIEW

The PGASA Safeguarding policy will be reviewed regularly to ensure it continues to meet the required standards and to reflect any relevant changes in the environment in which the PGASA and its membership operate and any significant incidents in the sport.

9. REPORTING CONCERNS

The following procedures apply to any incidents, concerns, allegations or disclosures of harassment and abuse brought to the attention of the PGASA (herein referred to as “complaints”).

If a complaint of harassment or abuse is perpetrated by or against a child or an adult, any action taken must be in accordance with the PGASA’s Safeguarding policy and procedures.

9.1. Reporting

Anyone can report an incident of harassment or abuse. Mechanisms for receiving the information are as follows:

- 9.1.1. In writing using the PGASA/GolfRSA template form;
- 9.1.2. By phone or email to a PGASA/GolfRSA Safeguarding Officer(s);
- 9.1.3. In person to a PGASA/GolfRSA Safeguarding Officer(s).

9.2. Whistleblowing

- 9.2.1. Although incidents can be reported directly by the affected individual, the term “whistle blowing” is used to describe a complaint relating to the conduct of an individual made by someone other than the affected person.
- 9.2.2. The PGASA recognises that some individuals may be fearful of the consequences of making a complaint under these procedures, particularly where the perpetrator is in a position of authority. In these circumstances, where possible, the identity of the whistle blower will remain confidential.
- 9.2.3. Any person who makes a complaint in good faith must not be subject to reprisal or other adverse consequences because of submitting a report. These protections shall not apply to a person who intentionally makes a complaint that is false, vexatious, retaliatory or frivolous.

9.3. Assessment of Complaints

- 9.3.1. Any complaints pursuant to this policy received by the PGASA will be referred to the PGASA Safeguarding Officer(s) who is the first point of contact for complaints and concerns under this procedure.
- 9.3.2. The PGASA Safeguarding Officer(s) will make an initial assessment of the complaint to determine the nature of the concern and whether the matter relates to a PGASA Member or Associate under PGASA jurisdiction.
- 9.3.3. If the complaint is believed to be a criminal offence, the PGASA Safeguarding Officer(s) will refer the matter to the police and other relevant authorities and/or regulatory bodies without delay.
- 9.3.4. If the complaint is not considered to be a matter for the police, the PGASA Safeguarding Officer(s) should:
 - 9.3.4.1. Refer the complaint to GolfRSA or another organisation if the complaint is not against a Member or Associate of the PGASA;
 - 9.3.4.2. Refer the matter to the GolfRSA Case Management Group if the complaint is against a Member or Associate of the PGASA.

- 9.3.4.3. Refer the matter to the PGASA Board of Directors if the complaint is in breach of the PGASA Code of Ethics.
- 9.3.5. The GolfRSA Case Management Group will consider the complaint and should determine to:
 - 9.3.5.1. Proceed with an investigation;
 - 9.3.5.2. Resolve the matter informally;
 - 9.3.5.3. Dismiss the complaint as unfounded or as insufficiently serious to require any action by the PGASA Board of Directors as per the PGAs Code of Ethics.
- 9.3.6. The PGASA Safeguarding Officer(s) will assess whether any of the affected parties require support and arrange for support to be provided where deemed appropriate.

9.4. Interim Measures

- 9.4.1. The PGASA may impose interim protective measures, including the suspension of the Member or Associate where one or more of the following circumstances applies:
 - 9.4.1.1. The Member or Associate is believed to present a significant risk to other golfers;
 - 9.4.1.2. The reputation of the sport and/or of golf and/or of the PGASA is at risk; and/or
 - 9.4.1.3. The Member or Associates ongoing presence may hinder investigations.

9.5. GolfRSA Case Management Group

- 9.5.1. The role of the Case Management Group is to support the PGASA National Safeguarding Officer(s) to manage complaints or reported concerns with regards to possible harassment, abuse of participants in golf or exposure to poor practice.
- 9.5.2. The duties and responsibilities are as follows:
 - 9.5.2.1. To ratify any actions already taken by the PGASA National Safeguarding Officer;
 - 9.5.2.2. To initially assess and agree immediate response;
 - 9.5.2.3. To consider the complaint and deciding whether to:
 - 9.5.2.3.1. Proceed with an investigation;
 - 9.5.2.3.2. Resolve the matter informally;
 - 9.5.2.3.3. Dismiss the complaint as unfounded or as insufficiently serious to require any action by the PGASA Board.
 - 9.5.2.4. To consider relevant evidence collated in respect of complaints in reports prepared by appointed investigators and determine whether:
 - 9.5.2.4.1. The matter is referred to the PGA Board of Directors for disciplinary action as per the PGAs Code of Ethics;

- 9.5.2.4.2. Further investigations are required;
- 9.5.2.4.3. A risk assessment needs to be completed;
- 9.5.2.4.4. Instructions, advice or guidance should be provided to the relevant parties;
- 9.5.2.4.5. No further action is required.

9.6. Disciplinary & Appeal

- 9.6.1. Any disciplinary proceedings, including the right of appeal will be conducted in accordance with the PGASA Code of Ethics and Disciplinary Procedure therein.
- 9.6.2. The standard of proof for such proceedings is the civil standard of balance of probabilities. Consequently, the PGASA may seek to take disciplinary action irrespective of the outcome of any criminal proceedings.
- 9.6.3. The PGASA will provide appropriate support and guidance to ensure all Members and Associates understand the disciplinary and appeal procedures, especially if children are involved.

9.7. Sanctions

- 9.7.1. Any sanction will be imposed in accordance with the PGASA Code of Ethics and Disciplinary Procedure therein.
- 9.7.2. The Independent Disciplinary Panel may consider the following, singly or in combination, depending on the nature and severity of the conduct and whether there are any aggravating and mitigating circumstances:
 - 9.7.2.1. Written or verbal apology;
 - 9.7.2.2. Formal warning;
 - 9.7.2.3. Fine;
 - 9.7.2.4. Risk assessment;
 - 9.7.2.5. Training and/or supervision;
 - 9.7.2.6. Temporary suspension;
 - 9.7.2.7. Termination of membership, license, agreement or contract; or
 - 9.7.2.8. Any other sanction that the Independent Disciplinary Panel considers appropriate in the circumstances.

9.8. Non-Recent Incidents

- 9.8.1. Serious allegations of sexual abuse may be made some time after the incident of abuse. Where a non-recent allegation is made, the PGASA National Safeguarding Officer(s) should:
 - 9.8.1.1. Clarify whether there is a current risk to any golfers; and
 - 9.8.1.2. Advise the individual of their right to make a formal complaint to the police.
- 9.8.2. This policy does not apply any specific limitations periods for sexual abuse and any serious allegation of non-recent abuse will be treated in accordance with these procedures.

10. CRIMINAL CONVICTIONS AND FINDINGS OF FACT

- 10.1. The PGASA shall establish that an incident of harassment and abuse has occurred where:
 - 10.1.1. A PGASA Member or Associate is convicted of a criminal offence; or
 - 10.1.2. GolfRSA, a recognised global PGA or another recognized regulatory body has determined that an allegation(s) of harassment or abuse against a PGASA Member or Associate is/are proven.
- 10.2. The Independent Disciplinary Panel having considered any representations made by the Member or Associate and any other affected parties may determine that it is appropriate to impose a sanction relating to PGASA activities.
- 10.3. The Independent Disciplinary Panel may apply the PGASA; or recognised global PGAs sanction to some or all PGASA activities; or determine its own sanction(s). Any sanction imposed by the PGASA shall be subject to a right of appeal in accordance with the PGASA Code of Ethics and Disciplinary Procedures.

11. RETENTION OF RECORDS

- 11.1. Any information relating to complaints of harassment or abuse will be stored securely and be compliant with the requirements of legislation relating to the Protection of Personal Information.
- 11.2. Any information about poor practice or complaints about harassment and abuse that may indicate that a Member or Associate in a position of trust is unsuitable to work or volunteer in the sport will be retained for as long as the Member or Associate remains active in the sport or for 10 years, whichever is longer, even if it were not possible at the time that the information was first reported to instigate any formal proceeding.
- 11.3. Any other records relating to other complaints will be retained for a period of 3 years unless a similar complaint arises within that period.
- 11.4. Any records relating to disciplinary action taken by PGASA should be retained in accordance with the retention periods set out in the PGASA Code of Ethics and Disciplinary Procedure.

PART B -SAFE RECRUITMENT OF STAFF AND PGASA MEMBERS

The following policies and procedures are aimed at ensuring all reasonable steps are taken during the recruitment of staff and Members and Associates within the Pathway to Membership Program to prevent unsuitable individuals from working in the sport and becoming members of the PGASA.

1. INTRODUCTION

- 1.1. The PGASA will ensure all reasonable steps are taken during recruitment to prevent unsuitable individuals from working with children, young people, persons with a mental and/or physical disability and other vulnerable adults.
- 1.2. All individuals involved in golf activity who will have significant access to children, young people, persons with a mental and/or physical disability and other vulnerable adults must be vetted to establish whether they have any criminal convictions or other past behaviour that suggests they are unsuitable to work with children, young people, persons with a mental and/or physical disability and other vulnerable adults or may present a risk to them. This applies equally to paid PGASA staff and Members.
- 1.3. All existing and new employees working in roles that involves “regular contact” with children, young people, persons with a mental and/or physical disability and other vulnerable adults; or where they hold a position of trust; or existing staff who change their role to work with these vulnerable groups, are required to complete a vetting process.
- 1.4. The PGASA Safe Recruitment policy and procedures apply to anyone, whether recruited to a voluntary or paid role who is going to have significant access to children, young people, persons with a mental and/or physical disability or other vulnerable adults or have access to their personal data.
- 1.5. Although the vast majority of staff and Members that work in golf are committed, dedicated people who are motivated to work within the sport for commendable reasons, it is vital that all reasonable steps are taken to ensure that any unsuitable people or people who may cause harm to children, young people, persons with a mental and/or physical disability and other vulnerable adults are prevented from working with them.
- 1.6. The PGASA Safe Recruitment policy and procedures aim to safeguard all participants in golf from harassment, abuse or exposure to poor practice.
- 1.7. The PGASA also considers that persons prohibited from working with children or persons with a mental disability may also not be suitable to work with young people and other vulnerable adults.

2. IMPORTANT LEGISLATION

2.1. The Children’s Act

- 2.1.1. The CHILDREN'S ACT 38 of 2005 as amended makes provisions for a National Child Protection Register and states that no person whose name appears in Part B of the Register may manage or operate, or participate or assist in managing or operating, a school, club or association providing services to children. A person who fails to disclose the fact that their name is entered in Part B of the Register is guilty of misconduct.

- 2.1.2. All PGASA Members and Associates must declare whether or not their name appears in Part B of the National Child Protection Register.

2.2. **The Criminal Law (Sexual Offences and Related Matters) Amendment Act**

- 2.2.1. The CRIMINAL LAW (SEXUAL OFFENCES AND RELATED MATTERS) AMENDMENT ACT 32 OF 2007 as amended makes provision for a National Register for Sexual Offenders and places responsibilities on employers and employees in respect of the act.
- 2.2.2. The CRIMINAL LAW (SEXUAL OFFENCES AND RELATED MATTERS) AMENDMENT ACT 32 OF 2007 defines an employer as set out in the act as including any person, organisation, institution, club, sports club, association or body who or which, as the case may be:
 - 2.2.3. employs employees who, in any manner and during the course of their employment, will be placed in a position of authority, supervision or care of a child or a person who is mentally disabled or working with or will gain access to a child or a person who is mentally disabled or places where children or persons who are mentally disabled are present or congregate;
 - 2.2.4. owns, manages, operates, has any business or economic interest in or is in any manner responsible for, or participates or assists in the management or operation of any entity or business concern or trade relating to the supervision over or care of a child or a person who is mentally disabled or working with or who gains access to a child or a person who is mentally disabled or places where children or persons who are mentally disabled are present or congregate.

2.3. **The CRIMINAL LAW (SEXUAL OFFENCES AND RELATED MATTERS) AMENDMENT ACT 32 OF 2007** as amended, defines employees as:

- 2.3.1. any person who applies to work for or works for an employer, and who receives, or is entitled to receive, any remuneration, reward, favour or benefit;
- 2.3.2. any person, other than a person contemplated in the above, who in any manner applies to assist or assists in carrying on or conducting the business of an employer, whether or not he or she is entitled to receive any remuneration, reward, favour or benefit.
- 2.3.3. The PGASA will not permit a person whose name appears on the National Register for Sexual Offenders to become a Member or Associate of the Association because of the public facing nature of a golf professional's job; no matter what sphere of the industry it is in, he/she will come into contact with children or persons who are mentally disabled or vulnerable as a consequence of their duties.
- 2.3.4. The PGASA is required to apply to the Registrar of the National Register for Sexual Offenders for a prescribed certificate, stating whether or not the particulars of a Member or Associate as defined by the act are recorded in the Register. All Members and Associates of the PGASA must be checked against the National Register for Sexual Offenders. Such vetting against the register must be done for all future Members and Associates and retrospectively for existing Members and Associates.

- 2.3.5. Members and Associates are required to inform the PGASA if they have been convicted of a sexual offence against a child or a person who is mentally disabled, or is alleged to have committed a sexual offence against a child or a person who is mentally disabled and who has been dealt with in terms of section 77 (6) or 78 (6) of the Criminal Procedure Act, 1977, irrespective of whether or not such offence was committed or allegedly committed during the course of their membership of the PGASA, must without delay disclose such conviction or finding to the PGASA. Failing to disclose is a criminal offence liable on conviction to a fine or to imprisonment not exceeding seven years or to both a fine and such imprisonment.
- 2.3.6. Although the PGASA does not appear to be a recognized association for the purpose of accessing the National Child Protection Register, the Members and Associates must still apply for a certificate of clearance. Whilst awaiting this clearance the onus is on the Member and Associate to declare in an affidavit if they are named on the register. This affidavit must be placed in the Member or Associates file until such time as a clearance certificate from the Department of Social Development is received. Where the PGASA suspect a Member or Associate may have made a false declaration with regards to their name not appearing on the National Child Protection Register they will report the matter to the SAPS or Social Services for them to investigate.
- 2.3.7. Although the PGASA is required to apply to the Registrar of the National Register for Sexual Offenders for a prescribed certificate, stating whether or not the particulars of a Member or Associate are recorded in the Register, the Registrar has indicated in writing that the issuing of clearance certificates and verifying of individuals for any purpose is not yet operational. In the event of the unavailability of such clearance certificates for any reason, the onus is therefore on the Member and Associate to declare if they are named on the register. In addition to obtaining a SAPS clearance certificate, Members and Associates must also disclose to the PGASA (on affidavit) that they have never been convicted of a sexual offence against a child or a mentally disabled person. This affidavit must be placed in the Members or Associates file to be utilised at a future date once the Register becomes fully operational. Where the PGASA suspect a Member or Associate may have made a false declaration with regards to their name not appearing on the National Register of Sexual Offenders they will report the matter to the SAPS or Social Services for them to investigate.

2.4. Minimum Standards

- 2.4.1. The PGASA minimum standards for the vetting of potential Associates for a career in the sport to be undertaken during the recruitment process for new Associates in order to prevent unsuitable individuals from working with children, young people, persons with a mental; disability and other vulnerable adults.
- 2.4.2. All potential Associates must submit a police clearance certificate.
- 2.4.3. All potential Associates must also disclose via affidavit to the PGASA (on affidavit) that they have never been convicted of a sexual offence against a child or a mentally disabled person and that their name does not appear in Part B of the National Child Protection Register as a person deemed unsuitable to work with children.

- 2.4.4. All potential Associates must provide the names of two people who must provide a reference.
- 2.4.5. The PGASA must implement the minimum standards to check the suitability of individuals from working with children, young people, persons with a mental disability and other vulnerable adults. Any concerns raised as to the suitability of an individual to work with children, young people, persons with a mental disability and other vulnerable adults during the vetting of Associates must be investigated before a decision is made to accepting the application of an Associate.
- 2.4.6. If a concern has arisen during the vetting of an Associate regarding their suitability to work with children, young people, persons with a mental and/or physical disability and other vulnerable adults, the PGASA may complete a further investigation to determine if the application to become an Associate within the Pathway to Membership Program will be accepted.
- 2.4.7. As people who want to abuse children, young people, persons with a mental and/or physical disability and other vulnerable adults may seek out various avenues to gain access to children, young people, persons with a mental and/or physical disability and other vulnerable adults, it is important that the minimum standards for vetting are followed at all times.

3 ADDITIONAL APPLICATION MEASURES

- 3.1 The following additional measures should be implemented when considering an application of a Member or Associate for a role in the sport to check the suitability to work with children, young people, persons with a mental and/or physical disability or other vulnerable adults:
 - 3.1.1 Considering the person's qualifications and experience for the role;
 - 3.1.2 Identifying a timeline of previous roles in golf, other sports, and any other role that involved working directly with children, young people, persons with a mental disability or other vulnerable adults;
 - 3.1.3 Assessing attitudes and commitment to safeguarding;
 - 3.1.4 Assessing their previous experience of working with children both inside and outside of golf;
 - 3.1.5 Giving the applicant a scenario of a safeguarding nature such as child not being collected after a golf session and ask what they do in that circumstance;
 - 3.1.6 Asking the applicant if they have ever been refused work that involved contact with children, young people, persons with a mental and/or physical disability or other vulnerable adults or anything that the association should know that could affect their suitability to work with children, young people, persons with a mental and/or physical disability or other vulnerable adults.

PART C - SAFE GOLF.

The following policies and procedures are aimed at creating a safe environment for participants in the sport of golf to take part in the sport free from harassment and abuse.

1. DUTY OF CARE

- 1.1. All Members and Associates have a responsibility for the safety and welfare of golfers, coaches, volunteers, officials, visitors and others. This responsibility applies to all PGASA Members and Associates. There is a legal responsibility to ensure that participants are protected from harm whilst taking part in the sport of golf. This is legally termed as the 'duty of care' and is of paramount importance when dealing with children or adults with a mental disability.
- 1.2. In order to fulfil their 'duty of care' the Members and Associates must:
 - 1.2.1. Take steps to keep golfers safe from harassment or abuse and ensure the welfare of all golfers;
 - 1.2.2. Ensure that venues for golfing activity are safe;
 - 1.2.3. Ensure the development of golfers is pursued through appropriate physical and psychological preparation and progressive skill development;
 - 1.2.4. Put in place suitable first aid support and emergency procedures;
 - 1.2.5. Exercise reasonable care at all times.
- 1.3. When working with children and vulnerable adults, a person who carries out a supervisory role takes on certain responsibilities while the child or vulnerable adults are in their care. This may include:
 - 1.3.1. Holding a responsibility for the wellbeing of golfers during playing and practice;
 - 1.3.2. Being responsible for the safe dispersal of children or vulnerable adults after training;
 - 1.3.3. Providing first aid;
 - 1.3.4. Providing/consenting to emergency medical treatment;
 - 1.3.5. Undertaking a supervisory role or being a chaperone;
 - 1.3.6. Acting as a team manager.

2. SAFEGUARDING OFFICERS

- 2.1. Although all PGASA Members and Associates have a duty of care to safeguard golfers, an important strategy in safeguarding in sport is the designation of an individual who is responsible for safeguarding and promoting the welfare of participants in the sport. PGASA is required to appoint a competent person as its Safeguarding Officer.
- 2.2. PGASA will appoint a competent person(s) as Safeguarding Officer(s) at a national level.

- 2.3. Safeguarding Officers are responsible for:
 - 2.3.1. Responding to harassment, abuse and poor practice concerns;
 - 2.3.2. Providing support and advice on the implementation of procedures that safeguard and promote the welfare of golfers.
- 2.4. All Safeguarding Officers are required to undertake the GolfRSA or approved PGASA training on safeguarding golfers prior to their appointment and to attend regular updates.

3. GUIDANCE FOR PGASA MEMBERS AND ASSOCIATES INVOLVED IN COACHING

3.1. Good practice

- 3.1.1. PGASA Members and Associates should always maintain high standards of practice as golfers of all ages look to them for guidance and hold them as role models. PGASA Members and Associates have a duty of care for the golfers they are coaching; and should always follow good practice guidance to ensure that the golfers they coach are safeguarded and the coaches are protecting themselves from any allegations.
- 3.1.2. Good practice includes:
 - 3.1.2.1. Endorsing golf as a fun and enjoyable sport and promoting fair play;
 - 3.1.2.2. Treating all golfers with respect and dignity and giving similar attention and time to all golfers regardless of their background or level of ability;
 - 3.1.2.3. Keeping coaching qualifications up to date and operating within the level of their coaching qualification;
 - 3.1.2.4. Acting as a role model for golfers, for example not smoking or drinking around the athletes and being mindful of behaviour at training sessions, events or social gatherings;
 - 3.1.2.5. Not condoning rules violations or the use of prohibited substances;
 - 3.1.2.6. Ensuring that training sessions are appropriate for the age and stage of development, both physical and emotional, and experience of the golfers being coached;
 - 3.1.2.7. Ensuring training and competition schedules are based on the needs and interests of the golfer and not those of parents, coaches, golf clubs/facilities, sponsors, Provincial Unions or National Associations;
 - 3.1.2.8. Ensuring that the golfers wellbeing is paramount and recognising that performance comes after this;
 - 3.1.2.9. Enabling young people to assist in making decisions which relate to them;
 - 3.1.2.10. Maintain a safe and appropriate relationship with golfers, it is not appropriate to have an intimate relationship with a child or young person;

- 3.1.2.11. Not tolerating any form of bullying or aggression in the sport;
- 3.1.2.12. Understanding the golfers being coached and not pushing them too hard and against their will and ability level.
- 3.1.2.13. Providing feedback to golfers in a constructive and positive manner.

3.2. **Poor practice**

- 3.2.1. Coaches who demonstrate poor practice open themselves up to a greater risk of allegations being made against them.
- 3.2.2. The following are some examples of poor practice that should be avoided by Members and Associates while coaching:
 - 3.2.2.1. Never be alone with a child or vulnerable adult including:
 - 3.2.2.1.1. Taking them to and from training or an event;
 - 3.2.2.1.2. Taking them to your home or in your car, where you will be alone with them or sharing a room with them.
 - 3.2.2.2. Never allow any form of inappropriate behaviour or language;
 - 3.2.2.3. Never be involved in, or allow, behaviour which causes emotional distress;
 - 3.2.2.4. Never spend excessive amounts of time alone with one child or vulnerable adult away from the others;
 - 3.2.2.5. Never engage in rough, physical or sexually provocative games;
 - 3.2.2.6. Never share a room with a child or a vulnerable adult. Adults should never share a room with children, young or vulnerable adults. It is unacceptable that a number of children and adults share a common sleeping area;
 - 3.2.2.7. Never allow or engage in any form of inappropriate touching;
 - 3.2.2.8. Never allow a golfer (children or adult) to use inappropriate language unchallenged;
 - 3.2.2.9. Never make sexually suggestive comments to a golfer (child or adult);
 - 3.2.2.10. Never reduce a golfer (child or adult) to tears as a form of control;
 - 3.2.2.11. Never allow allegations made by a child or adult to go unchallenged, unrecorded or not acted upon;
 - 3.2.2.12. Never do things of a personal nature for children or vulnerable adults that they can do for themselves;
 - 3.2.2.13. Never invite or allow children or vulnerable adults to stay with you at your home;
 - 3.2.2.14. If cases arise where situations are unavoidable, they should only occur with the full knowledge and consent of the person in charge, and in the case of a child with parental consent;

3.2.2.15. If any of the following incidents should occur, you should report them immediately to the PGASA Safeguarding Officer(s), or another colleague, make a written note of the event and inform parents of the incident:

3.2.2.15.1. If you accidentally hurt a golfer;

3.2.2.15.2. If a child or vulnerable adult seems distressed in any manner, whilst in your care;

3.2.2.15.3. If a child or vulnerable adult appears to be sexually aroused by your actions;

3.2.2.15.4. If a child or vulnerable adult misunderstands or misinterprets something you have done.

3.3. Manual support while coaching

3.3.1. Supporting the golfer during coaching may be required to help the golfer to understand a movement or complex skill.

3.3.2. The key points on manual support while coaching are:

3.3.2.1. The coach must only engage with manual support with explicit consent from the golfer. i.e., “Can I help you with....?”;

3.3.2.2. The coach must ensure that support is only used when necessary and “over-handling” is avoided;

3.3.2.3. The coach must always be alert to the possibility of performance errors or anxiety, which may increase the risk of injury;

3.3.2.4. Physical contact should not be invasive of sensitive areas of the body, i.e., genital areas, buttocks or breasts.

3.3.3. Infrequent non-intentional physical contact can arise out of error on the golfer’s or coach’s part. Such situations should not be ignored and need to be acknowledged through an apology to the golfer and reported to the PGASA Safeguarding Officer or head coach and parents. A written report should be made of any significant incident, which is to be reported to the PGASA Safeguarding Officer.

3.4. Flexibility/stretching exercises

3.4.1. There are a range of techniques and types of exercise for extending flexibility that involve the application of force. These techniques can also lead to the person applying the force coming into close proximity with the golfer and having prolonged contact with areas of the golfer’s body.

3.4.2. Coaches must follow the following guidelines:

3.4.3. Use slow, progressive and prolonged stretching exercises, within the “discomfort zone”, rather than what might be considered to be excessive force;

3.4.4. Avoid exercises that place the coaches and golfers’ body in “close proximity” and might be seen as unnecessary by the less-informed parent or observer;

- 3.4.5. Be sensitive to how the exercise might be perceived by the parents and children;
- 3.5. Rule of Two
- 3.5.1. The PGA recommends that in order to safeguard children and adults, that at least two responsible unrelated adults are always present during golf training to avoid situations where a responsible person is alone with a child or vulnerable adult. At least one of the two responsible adults should be the same gender as the golfer(s).
 - 3.5.2. There may be occasions especially where the golfer is training at a high-performance level where one-to-one coaching may be appropriate. PGASA Members and Associates should only conduct such sessions when there is another responsible adult present, in view of all activities or in the case of a child where a parent is present.
- 3.6. **Relationships with athletes and position of trust**
- 3.6.1. PGASA Members and Associates who coach must ensure that their relationship with any golfer under 18 years of age is professional and appropriate. It must be recognised that the relationship between coaches and golfers is important for developing athletes' potential and self-esteem, and also in establishing trusting relationships with a responsible adult, which has been identified multiple times as being critical in children divulging disclosures.
 - 3.6.2. Coaches can easily influence the athletes in their care and the resulting power of a professional relationship cannot be over stated. It is the responsibility of the coach to ensure that they do not abuse their position of trust.
 - 3.6.3. Sexual relationships with children under 16 years of age are illegal and as such will lead to disciplinary action as well as being referred to the SAPS/Social Services for investigation.
 - 3.6.4. A sexual relationship between a person with authority over a young person and a child aged 16 or 17 years is not considered appropriate by the PGASA. While it may not constitute a criminal offence, coaches and others in positions of authority and trust in relation to golfers aged 16 and 17 years must not engage in sexual relationships with them while that unequal power relationship exists.
- 3.7. **Adults in positions of trust in dual roles**
- 3.7.1. Some PGASA coaches hold relevant professional accreditations that would enable them to fulfil a range of support roles within the sport. Common examples include coaches who are also trained as physical therapists and bio kineticists.
 - 3.7.2. PGASA coaches who wish to make use of their professional qualifications within the sport must first ensure the person being treated is completely clear about the capacity in which they are acting. The adult in the position of trust is ultimately responsible for maintaining appropriate professional boundaries and ensuring that there is a clear separation between their coaching role and any other activities they undertake.

- 3.7.3. Any Member or Associate who provides an additional support service within the sport must not treat children that they coach without parental supervision.

3.8. Late collection of children

- 3.8.1. Occasionally parents/carers may become delayed or unable to collect children from training sessions.
- 3.8.2. When new junior golfers come for coaching, their parents should be advised who to contact if they will be delayed in collecting their child and advise them of the action to be taken. For example, they would need to advise if a parent of another junior golfer could take their child home. It is important that emergency contact details are collected for all junior golfers that are being coached. If a coach is unable to contact their primary contact, emergency contact details are essential.
- 3.8.3. PGASA Members and Associates who coach should avoid:
 - 3.8.3.1. Asking the child to wait alone with the coach or being left alone with any child who has not been collected;
 - 3.8.3.2. Taking any child home or to another location;
 - 3.8.3.3. Allowing the child to leave with another person or parent without permission.

3.9. Missing child guidance

- 3.9.1. In the unfortunate incident that a child goes missing during golf club/facility activities it is important to remember that most children are found within a few minutes of their disappearance. The PGASA provide the following guidance in relation to the actions that should be taken in this occurrence:
 - 3.9.1.1. Ensure any other young people you are responsible for are appropriately looked after while the search is being completed for the missing child;
 - 3.9.1.2. Organise all available adults to fully search specified areas, particularly obvious areas of danger;
 - 3.9.1.3. If the child cannot be found after a good search of the immediate surroundings, contact the child's parents to advise them of the concern and reassure them that everything is being done to locate the child;
 - 3.9.1.4. Ensure that the area in which the child has gone missing is fully searched, including changing rooms, toilets, public and private areas;
 - 3.9.1.5. Ensure that there is a single point of contact for all individuals searching to report back to. This individual should record all of the events that have occurred as well as creating a physical description of the young person to include approximate height, build, hair and eye colour in addition to what they were last seen wearing, where and when they were last seen;

- 3.9.1.6. If the young person has not been found within 20 minutes the SAPS should be informed, even if the search has not been fully completed;
- 3.9.1.7. Once you have contacted the SAPS, they will advise if further action is required before their involvement. If the SAPS act upon your report, follow their guidance and requests for progressing the search;
- 3.9.1.8. As soon as the young person is located be sure to communicate this to all individuals involved in the search.

3.10. Including children in decision making

- 3.10.1. The South African Government ratified in 1995 the UN Convention on the Rights of the Child. South Africa has enshrined children's rights in the Constitution (Act 108 of 1996), the supreme law of the country that was designed to respect, protect, promote and fulfil the rights of all people in the country.
- 3.10.2. One of the four core principles of the UN Convention on the Rights of the Child is the need to show respect for the views of the child. Article 12 of the Convention states: 'children have a right to an opinion and for it to be listened to and be taken seriously'.
- 3.10.3. PGASA Members and Associates should ensure that children have an opportunity to be consulted and, where appropriate, be involved in decisions that relate to their involvement in the sport, as well as within the specific area of safeguarding policy and procedures.
- 3.10.4. Key principles when involving children:
 - 3.10.4.1. The extent that a child can be involved in decision making will depend on their age and level of maturity and understanding;
 - 3.10.4.2. Children and young people's involvement and opinions must be acknowledged and appreciated;
 - 3.10.4.3. Children should be treated honestly. Their expectations need to be managed and boundaries that may limit their involvement explained;
 - 3.10.4.4. Children should be provided with timely feedback about how their involvement has shaped or influenced a policy or approach;
 - 3.10.4.5. All children should be given the opportunity to be involved irrespective of race, religion, culture, disability, age, ethnic origin, language or the area in which they live;
 - 3.10.4.6. Children should always be provided with age-appropriate information to help them understand;
 - 3.10.4.7. Information for children should be clear and accessible and in appropriate language and style of communication;

- 3.10.4.8. Children and young people should be supported to enable them to make a positive and effective contribution, e.g., by the designated golf club Safeguarding Officer.

3.11. **Managing communication**

- 3.11.1. All PGASA Members and Associates must follow this communication policy that covers the use of communication devices and the manner in which coaches can communicate with children and vulnerable adults.
- 3.11.2. The following key points:
 - 3.11.2.1. Cell phones should be turned off during coaching sessions except in the case where a phone is used as a club contact number or for emergencies;
 - 3.11.2.2. Coaches should not communicate with golfers under the age of 18 years by text message, social media, internet chat rooms/networking sites or e-mail;
 - 3.11.2.3. All communication by the above methods should be through the parent;
 - 3.11.2.4. Subject to parental consent, coaches can communicate with young people over the age of sixteen years either by group e-mails/texts or by copying correspondence to the parent(s);
 - 3.11.2.5. Coaches should limit communications to training related issues;
 - 3.11.2.6. In the event of a young golfer showing a coach a text message, image or email that is considered to be inappropriate for a child to have, the coach must inform the Club Safeguarding Officer.
- 3.11.3. As technology has developed, the internet and its range of services can increasingly be accessed through various devices including cell phones, computers and game consoles. Although the internet has many positive uses, it provides a platform for the distribution of images of child abuse. In addition, networking sites and chat-rooms have increasingly been used by people for the purpose of 'grooming' children and young people for abuse, and by children as a means of bullying.

3.12. **Communicating with children and vulnerable adults**

- 3.12.1. It is important that PGASA Members and Associates communicate appropriately with children and vulnerable adults at the golf club/facility, be that in person, by phone, in writing, text, online, or any other form of communication.

3.13. Mobile phone and online guidance

- 3.13.1. The development and use of cell phones have grown exponentially and communicating by text, email and instant messaging has become the norm. The intention of this guidance is to provide PGASA Members and Associates and those in positions of trust with a better understanding of best practice in this area.
- 3.13.2. Coaches should only hold the contact details for children and persons with a mental disability, if they have written permission from parents/carers.
- 3.13.3. Communication to children and persons with a mental disability should always be copied into a parent/carer, and should be relevant to the golfer's participation in golf.
- 3.13.4. Instead of holding the contact details for children and persons with a mental disability, coaches could hold the contact details of the parents/carers of children or persons with a mental disability and ask them to pass on any relevant information to the golfer.
- 3.13.5. In certain situations, it may be necessary for the coach to have a child or persons with a mental disability contact number, for example if away on a training camp. In these situations, the parent/carer of the children or persons with a mental disability concerned should be advised in what type of situations the details will be used and they would need to provide permission for this. Immediately following these circumstances, the contact details should be deleted.
- 3.13.6. If sensitive data is held, then devices (e.g., mobile phones, laptops) should have appropriate security (e.g., passwords).
- 3.13.7. Additional guidance for coaches includes:
- 3.13.7.1. Avoid taking calls, texting, or being distracting by your phone, during training sessions. If answering a call is unavoidable it is imperative that there is another individual who can supervise the session during this time;
- 3.13.7.2. If using the camera function, the coach should have the permission of the young person's parents/carers and should follow the guidelines for photography and videography;
- 3.13.7.3. If the coach enters the changing facilities for any reason the camera function of their phone should not be used under any circumstances;
- 3.13.7.4. Photographs of young people under 18 years of age should only be published if the permission of their parents/carers has been given.
- 3.13.7.5. If a photo is published, the young person's details such as their full name, location of the photograph or any details that would enable them to be found should not be included.

- 3.13.7.6. If you are shown a message or image that is considered inappropriate for a young person to have, you should inform the golf club/facility Safeguarding Officer as soon as possible.

3.14. **Social media guidance**

- 3.14.1. Social media websites such as Twitter, Facebook and Instagram are fully integrated into daily life and as such the operation of many PGASA Members and Associates providing a convenient outlet to communicate with both current and potential golfers. Alongside the positive aspects of these sites there are the inherent dangers and consequences of misuse including cyber bullying, grooming, identity theft, and viewing unsuitable content.
- 3.14.2. As these sites are accessible to junior as well as senior golfers, PGASA Members and Associates must ensure that all posted messages have suitable content and format to avoid miscommunication of their meanings.
- 3.14.3. The PGASA Members and Associates will need to consider:
 - 3.14.3.1. What content is uploaded onto social media – photos, blogs, videos etc.;
 - 3.14.3.2. How to manage who can access what information;
 - 3.14.3.3. How content will be presented.
- 3.14.4. There are a number of good practice points that PGASA Members and Associates should follow when setting up and maintaining their social media sites including:
 - 3.14.4.1. Fully integrating procedures relating to the reporting of potentially abusive or illegal content/activity to ensure that these are in line with the PGASA and GolfRSA procedures;
 - 3.14.4.2. Understanding acceptable and unacceptable online behaviour and ensuring that this is communicated to all users. It should be clearly outlined to users who to contact if they have concerns, along with how they can be contacted;
 - 3.14.4.3. Ensure that all PGASA Members and Associates understand the importance of protecting their privacy online and that they understand the risks of posting and sharing content which could damage both theirs and their place of employment's reputation;
 - 3.14.4.4. Ensuring that the email address used to register the account/page is suitable, including the business entity as the domain name. This will reduce the risk of fake accounts being set up, improving the security for both the individual monitoring the account/page as well as the user accessing it. This should include how the access details for the account/page will be kept secure to ensure the threat of hacking and misuse is reduced;

- 3.14.4.5. How the account/page will be set up and managed:
- 3.14.4.5.1. As a page not a personal profile, this will enable updates to be shown in golfers' news feeds, the promotion of training or events and the page will appear in searches which could attract new golfers;
 - 3.14.4.5.2. Developed as a working group, ensuring that the Golf Club Safeguarding Officer is consulted as appropriate;
 - 3.14.4.5.3. Including the option for comments to be reviewed before being posted to ensure they are appropriate;
 - 3.14.4.5.4. Ensuring that permissions are granted if photographs are used, especially of golfers under 18 years of age;
 - 3.14.4.5.5. Gaining permission of golf club officers for their contact details to be published;
 - 3.14.4.5.6. Will the individual monitoring the account/page receive training before completing the role;
 - 3.14.4.5.7. How the privacy and security settings will be appropriately set to ensure that content is appropriate for all individuals who could be accessing the page/account;
 - 3.14.4.5.8. The ability to block individuals who should not have access or post offensive or inappropriate material;
 - 3.14.4.5.9. Including a profanity filter where possible;
 - 3.14.4.5.10. Including contact details for the club and appropriate club officers as this will enable users to verify the account/page, as well as knowing who to contact with any queries;
 - 3.14.4.5.11. Think before you post anything on to the page/account, do they fit with the current policies and guidance and do you have permission for any photographs or videos.

3.15. **Social Media Guidance for Coaches**

- 3.15.1. The PGASA make the following recommendations for individuals who are in a position of trust and have responsibility for children and vulnerable adults within their academies and golf clubs/facilities:

- 3.15.1.1. Any contact with children or vulnerable adults through social media, should be relevant to their participation in golf, and should be with the consent of parents/carers;
 - 3.15.1.2. If a young person requests to add you as a friend on social media you should decline if you:
 - 3.15.1.2.1. Use your social media account for personal purposes and there is a chance your account may include photos or content that would be inappropriate or deemed unprofessional for a child or young person to view or read, or that would make you look unprofessional;
 - 3.15.1.2.2. Are in contact with the child through their golf club/facility, and the child's parents/carers have not given permission for the contact.
 - 3.15.2. Never use social media to attack the PGASA, GolfRSA, its Provincial Unions, Golf Clubs/Facilities or fellow Members and Associates of the PGASA.
 - 3.15.3. Ensure that the use of any photographs or videos is in line with the GolfRSA photography guidance.
- 3.16. **Guidance for video recording a child during training sessions**
- 3.16.1. There should be a clear and valid reason as to why video recording a child during a training session would be necessary, a primary reason for this would be for athlete development and mastering a skill. If there is a valid reason consent would need to be obtained from the athlete's parents/carers before video recording is completed and they should also be offered the opportunity to sit with the child when the video is reviewed. Once the content has fulfilled its purpose, it should be deleted unless there is a valid reason for keeping the video recording.

4. GOLFRSA SAFEGUARDING POLICIES AND PROCEDURES

- 4.1. The following is covered within the GolfRSA Safeguarding Policy:
 - 4.1.1. Clubs and Safeguarding Guidelines (Supplement 5)
 - 4.1.2. Travel Guidelines (Supplement 7)
 - 4.1.3. Photography, Video and Use of Images (Supplement 8)
 - 4.1.4. Club Safeguarding Policy Acceptance (Appendix B)
 - 4.1.5. Safeguarding Incident Reporting Form (Appendix C)
 - 4.1.6. Safeguarding Pathways and Key Role Descriptions (Appendix D)
 - 4.1.7. Safeguarding Risk Assessment (Appendix E)

PART D - RECOGNISING AND RESPONDING TO HARASSMENT, ABUSE AND POOR PRACTICE.

The following policies and procedures are aimed at guiding participants in the sport of golf as to how to recognise and respond to harassment, abuse and poor practice.

1. INTRODUCTION

- 1.1. All who take part in golf should be able to recognise the signs and indicators of harassment and abuse and know how to respond to these signs. It is not the responsibility of individuals within golf to determine if harassment or abuse has, or is, occurring but they should report any concerns/ incidents to a safeguarding officer. It is not an individual's responsibility to approach the person they are worried about themselves.
- 1.2. PGASA will appoint a Safeguarding Officer(s) who will lead on all safeguarding matters nationally.

2. HARASSMENT, ABUSE & POOR PRACTICE

2.1. Harassment

- 2.1.1. **Harassment** is defined by the unwanted nature of the action, which could include attention or the provision of items. It is for any given individual to determine what they consider to be acceptable and what they regard as offensive. In some situations, harassment can be considered to be a criminal offence and can lead to a restraining order or prosecution.
- 2.1.2. The Protection from Harassment Act 2010, defines harassment as directly or indirectly engaging in conduct that the respondent knows or ought to know:
 - 2.1.2.1. causes harm or inspires the reasonable belief that harm may be caused to the complainant or a related person by unreasonably;
 - 2.1.2.2. following, watching, pursuing or accosting of the complainant or a related person, or loitering outside of or near the building or place where the complainant or a related person resides, works, carries on business, studies or happens to be;
 - 2.1.2.3. engaging in verbal, electronic or any other communication aimed at the complainant or a related person, by any means, whether or not conversation ensues; or
 - 2.1.2.4. sending, delivering or causing the delivery of letters, packages, facsimiles, electronic mail or other objects to the complainant or a related person or leaving them where they will be found by, given to, or brought to the attention of, the complainant or a related person; or
 - 2.1.2.5. amounts to sexual harassment of the complainant or a related person.

2.1.3. **Sexual harassment** means any unwanted and unwelcome conduct of a sexual nature, whether verbal, non-verbal or physical. Sexual harassment can take the form of sexual abuse.

Harassment can take a variety of forms with the most common being:

2.1.3.1. Suggestive sexual comments;

2.1.3.2. Racist insults/jokes;

2.1.3.3. Verbal abuse;

2.1.3.4. Unwelcome attention

2.2. Abuse

2.2.1. There are 4 categories of abuse: physical, psychological, sexual and neglect.

2.2.1.1. **Physical abuse** means any deliberate and unwelcome act, such as for example punching, beating, kicking, biting and burning, that causes physical trauma or injury. Such acts can also consist of forced or inappropriate physical activity (e.g., age-, or physique- inappropriate training loads; when injured or in pain), forced alcohol consumption, or forced doping practices.

2.2.1.2. **Psychological abuse** means any unwelcome act including confinement, isolation, verbal assault, humiliation, intimidation, infantilising, or any other treatment which may diminish the sense of identity, dignity, and self-worth.

2.2.1.3. **Sexual abuse** means any conduct of a sexual nature, whether non-contact, contact or penetrative, where consent is coerced/manipulated or is not or cannot be given.

2.2.1.4. **Neglect** means the failure of a coach or another person with a duty of care towards the athlete to provide a minimum level of care to the athlete, which is causing harm, allowing harm to be caused, or creating an imminent danger of harm.

2.2.2. Different forms of abuse may constitute criminal activity in South Africa as defined in the Criminal Procedure Act 51 Of 1977 as amended; the Children's Act 38 OF 2005 as amended and the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 Of 2007 as amended; and the Prevention and Combating of Trafficking in Persons Act 7 of 2013.

2.2.3. Harassment and abuse can be based on any grounds including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age disability, socio-economic status and athletic ability. It can include a one-off incident or a series of incidents. It may be in person or online.

2.2.4. Harassment may be deliberate, unsolicited and coercive.

2.2.5. Harassment and abuse often result from an abuse of authority, meaning the improper use of a position of influence, power or authority by an individual against another person.

2.3. **Poor practice**

2.3.1. **Poor practice** is behaviour of an individual in a position of responsibility which falls below the organisation's required standard (described in the Code of Ethics). Poor practice may not be immediately dangerous or intentionally harmful to a child or adult, but is likely to set a poor example.

2.4. **Effects of harassment, abuse and poor practice**

2.4.1. The impact of harassment on a child or adult can be profound and can result in the child or adult feeling unhappy, demoralised or undervalued. Harassment is often an ongoing form of abuse which causes extreme distress by the repeated action, usually verbally.

2.4.2. Abuse, whether short-term or prolonged, can be extremely damaging to the child and may affect their relationships and trust in others both currently and in the future. In extreme cases children who have been abused have developed drug and alcohol dependencies, illegal tendencies and in some cases have gone on to abuse children themselves.

2.4.3. Poor practice is potentially damaging to the individual, the organisation and to children or adults who experience it. For example, coaching with alcohol on the breath, smoking, swearing in front of coaching students, or not paying due care and attention to golfers all constitute poor practice.

2.4.4. Poor practice can sometimes lead to, or create, an environment conducive to harassment or abuse. It may also lead to suspicions about the individual's motivation, even where no harm is intended. For example, if a coach is giving one child too much attention, regularly transports children in their car, or encourages physical contact with children without obvious justification.

2.5. **Specific forms of abuse**

2.5.1. Abuse may occur in different forms and settings including:

2.5.1.1. **Domestic abuse:** includes Intimate Partner Violence (IPV) or a child witnessing IPV.

2.5.1.2. **Sexual Exploitation:** where women, children and young adults are sexually exploited for money, power or status.

2.5.1.3. **Bullying and Cyberbullying:** which can occur anywhere, at home, at school, at the sports club, and online. Bullying usually takes place over a long period of time and can cause physical and emotional harm.

2.5.1.4. **Grooming:** Children and young people can be groomed online or in the real world, by a stranger or by someone they know, a family member, friend or professional.

2.5.1.5. **Trafficking:** where women or children are recruited, moved or transported and then exploited, forced to work or sold. They are often moved away from their homes and forced to work in the sex trade.

- 2.5.1.6. **Hazing:** initiation ceremonies including rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group such as a sports team.
- 2.5.1.7. **Financial Abuse:** misappropriation of financial resources or abusive use of financial control, in the context of a relationship where there is an expectation of trust. Adults at risk, women in unequal relationships and older persons can be at risk of financial abuse.

2.6. **Bullying**

- 2.6.1. **Bullying** can be defined as repeated and deliberate actions or hurtful behaviour that is repeated over a period of time. The damage caused by bullying can frequently be underestimated and cause considerable distress to young people and could result in their health and development being affected.
- 2.6.2. Bullying can be:
 - 2.6.2.1. Physical: including pushing, kicking, hitting, pinching, and other forms of violence or threats;
 - 2.6.2.2. Verbal: name calling, sarcasm, spreading rumours, persistent teasing;
 - 2.6.2.3. Emotional: Excluding, tormenting, ridiculing, humiliating;
 - 2.6.2.4. Racial: racial taunts, graffiti, gestures;
 - 2.6.2.5. Sexual: unwanted physical contact, homophobic taunts, abusive comments.
- 2.6.3. Bullying can occur between:
 - 2.6.3.1. An adult and young person;
 - 2.6.3.2. A young person and another young person;
 - 2.6.3.3. A parent and their child.
- 2.6.4. With golf being competitive the opportunity for bullying may be increased. Examples within golf could include:
 - 2.6.4.1. An athlete being picked on for being a weaker competitor;
 - 2.6.4.2. Parents pushing their child too hard;
 - 2.6.4.3. A coach adopting a win at all costs attitude;
 - 2.6.4.4. Officials putting undue pressure on golfers.

2.7. **Grooming**

- 2.7.1. **Grooming** refers to an individual working to create an emotional connection with a child to gain their trust with the distinct purpose of sexual abuse or exploitation.
- 2.7.2. Grooming can be undertaken by both males and females and can occur both online and in the real world. It can be undertaken by an individual the child or young person knows or by a stranger.

- 2.7.3. Many children and young people will not understand that they have been groomed and that it constitutes abuse. Abusers may invest a lot of time and effort into gaining a child's, and possibly the rest of their family's trust by:
 - 2.7.3.1. Offering advice and understanding;
 - 2.7.3.2. Buying gifts, such as equipment;
 - 2.7.3.3. Giving the child attention;
 - 2.7.3.4. Using their professional position or reputation;
 - 2.7.3.5. Taking them on trips, outings or holidays.
- 2.7.4. Once they have established trust, groomers will exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what they want. Abusers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

2.8. **Trafficking**

- 2.8.1. The Prevention and Combatting the Trafficking in Persons Act 2013 states that "any person who delivers, recruits, transports, transfers, harbors, sells, exchanges, leases or receives another person within or across the borders of the Republic, by means of:
 - 2.8.1.1. a threat of harm;
 - 2.8.1.2. the threat or use of force or other forms of coercion;
 - 2.8.1.3. the abuse of vulnerability;
 - 2.8.1.4. fraud;
 - 2.8.1.5. deception;
 - 2.8.1.6. abduction;
 - 2.8.1.7. kidnapping;
 - 2.8.1.8. the abuse of power;
 - 2.8.1.9. the direct or indirect giving or receiving of payments or benefits to obtain the consent of a person having control or authority over another person; or
 - 2.8.1.10. the direct or indirect giving or receiving of payments, compensation, rewards, benefits or any other advantage, aimed at either the person or an immediate family member of that person or any other person in close relationship to that person, for the purpose of any form or manner of exploitation, is guilty of the offence of trafficking in persons.
- 2.8.2. There have been cases of trafficking linked to sport in South Africa where children have been transported to illegitimate sports training camps and been subjected to child abuse and neglect.

3. RECOGNISING HARASSMENT, ABUSE AND POOR PRACTICE

3.1. Safeguarding concerns may arise as a result of:

- 3.1.1. A disclosure from a child, protected adult, athlete or other vulnerable adult;
- 3.1.2. Direct or reported observation of possible abuse, neglect, suspicious behaviour or poor practice;
- 3.1.3. Significant or multiple changes in behaviour in a child's or adult's behaviour, appearance, attitude or relationship;
- 3.1.4. Reports from external agencies or individuals.

3.2. Children and vulnerable adults may not find it easy to disclose their concerns, and certain groups will find this more difficult for example, children from different racial groups may find it difficult to find people to tell. There may be language barriers, or children or adults may not be able to communicate due to a disability.

3.3. The majority of referrals will be made by adults who have concerns about a child or a vulnerable adult as identified by their behaviour or appearance.

3.4. It should not be assumed that abuse will be easy to identify as children and vulnerable adults can:

- 3.4.1. Be moody and unpredictable, especially during adolescence;
- 3.4.2. Experience changes in behaviour as a result of external situations.

3.5. Indicators of abuse could include:

- 3.5.1. Unexplained injuries such as burns, bruises or cuts which are on areas of the child's or an adult's body which are not normally prone to injury through playing;
- 3.5.2. Inconsistent reasons for a physical injury;
- 3.5.3. The child or vulnerable adult disclosing a concern which suggests an abusive act;
- 3.5.4. Another person, such as a parent, coach or team mate, raising concerns about a child's or vulnerable adult's wellbeing;
- 3.5.5. A child's inappropriate sexual awareness or engaging in sexually explicit behaviour;
- 3.5.6. Fearing or displaying a lack of trust in adults;
- 3.5.7. An excessive fear of making mistakes;
- 3.5.8. Difficulties making friends, or being prevented from doing so or socializing;
- 3.5.9. A sudden weight loss or gain, or variations in eating patterns that may identify an eating disorder.

3.6. While the above list contains a number of indicators this is not a complete list and there may be other signs that are observed. Further, if a child or vulnerable adult is exhibiting any one of the above it should not be considered proof that they are being abused, however if there are multiple signs being displayed there could be cause for concern.

- 3.7. It is important to remember it is not your responsibility to determine if abuse has occurred. Your responsibility is to report any concerns that you have.

4. RESPONDING TO DISCLOSURE

- 4.1. If a child or adult indicates that they are being harmed, or information is received that gives rise to concern that a child or adult is being harmed, the person receiving the information should:
- 4.1.1. Stay calm and ensure the child or adult is safe and feels safe;
 - 4.1.2. Listen carefully to what is being said, allowing the child or adult to continue at their own pace;
 - 4.1.3. Explain that it is likely that the information will have to be shared with others, do not promise to keep secrets;
 - 4.1.4. Keep questions to a minimum to ensure a clear and accurate understanding of what has been said;
 - 4.1.5. Reassure the child or adult that they have done the right thing in sharing the information;
 - 4.1.6. Show and tell the child or adult that what he/she says is being taken seriously and recognise any difficulties inherent in interpreting what they said;
 - 4.1.7. Tell the child or adult what will be done next and with whom the information will be shared;
 - 4.1.8. Record in writing what was said using the child's or adult's words as soon as possible.
 - 4.1.9. Record dates and times; any names mentioned; to whom the information was given; information should be noted as given as facts, hearsay or opinion; record should be signed and dated as a record.
- 4.2. If the child or adult indicates that they do not wish others to be informed about the allegations, carefully and tactfully explain the reasons why it may be in their best interests that the matter is referred to an appropriate person or department (SAPS, social services, sports organisation's safeguarding officer).
- 4.3. Receiving a disclosure places great responsibility on the person to whom the disclosure is made. If there is any uncertainty in what actions to be taken, consult with an appropriate person or organisation (SAPS, social services, sports organisation's safeguarding officer).
- 4.4. Actions to avoid:
- 4.4.1. Dismissing the concern (irrespective of whether you believe what you are being told or not, you should always report the disclosure, untrue disclosures even when the person is anonymous are rare);
 - 4.4.2. Panicking;
 - 4.4.3. Allowing shock or distaste to show;
 - 4.4.4. Probing for more information than is offered;
 - 4.4.5. Making promises that cannot be kept such as promising not to tell anyone;

- 4.4.6. Speculating or making assumptions;
- 4.4.7. Approaching the person who is the subject of the allegation or suspicion (this may put the child or adult at risk or jeopardise a criminal investigation);
- 4.4.8. Conduct a personal investigation of the case;
- 4.4.9. Making negative comments about the accused person.

5. REPORTING CONCERNS

- 5.1. Concerns may fall into two categories:
 - 5.1.1. Where harm is happening in the context of the sport of golf;
 - 5.1.2. Where harm is happening towards someone connected with the sport of golf; but is occurring at home or in a context outside of the sport.
- 5.2. Concerns could be with regard to a:
 - 5.2.1. Current Situation;
 - 5.2.2. Past (Historical) Situation.
- 5.3. Concerns might be about:
 - 5.3.1. Maltreatment (Harassment or Sexual, Physical, Emotional Abuse or Neglect);
 - 5.3.2. Poor Practice;
 - 5.3.3. Perceived Failure of an Organisation to Safeguard.
- 5.4. Anyone can report an incident of harassment or abuse. Mechanisms for receiving the information are as follows:
 - 5.4.1. In writing using the PGASA/GolfRSA template form;
 - 5.4.2. By phone or email to a PGASA/GolfRSA Safeguarding Officer(s);
 - 5.4.3. In person to a PGASA/GolfRSA Safeguarding Officer(s).
- 5.5. In situations where the child or adult is considered to be in immediate danger it will be necessary to notify the SAPS or social services.
- 5.6. In situations where there is no immediate danger your duty of care is to refer the concerns to the most appropriate person or organisation to take action.
- 5.7. Reports of concern should be recorded using the PGASA Safeguarding Report Form.
- 5.8. The PGASA Safeguarding Officer will take responsibility for referring the complaint to:
 - 5.8.1. Local SAPS where a crime is suspected of having taken place;
 - 5.8.2. Local social services where a child or adult is suspected of being at risk and requiring support and protection.
- 5.9. Any complaints pursuant to this policy received by the PGASA will be referred to the PGASA Safeguarding Officer(s) who is the first point of contact for complaints and concerns under this procedure.
- 5.10. The PGASA Safeguarding Officer(s) will make an initial assessment of the complaint to determine the nature of the concern and whether the matter relates to a golfer under PGASA jurisdiction.

- 5.11. If the complaint is believed to be a criminal offence, the PGASA Safeguarding Officer(s) will refer the matter to the Police and other relevant authorities and/or regulatory bodies without delay.
- 5.12. In most cases, the PGASA will delay internal investigations until the outcome of a criminal proceedings is known. Once a matter has been referred back from the police, the objective will be to conclude any investigations in a timely manner.
- 5.13. The PGASA Safeguarding Officer will take responsibility for referring the complaint to:
 - 5.13.1. SAPS where a crime is suspected of having taken place;
 - 5.13.2. Social services where a child or adult is suspected of being at risk and requiring support and protection;
 - 5.13.3. The PGASA Board where unacceptable behaviour or poor practice is suspected of taking place in the context of golfing activity.
- 5.14. Where an investigation is being conducted by SAPS or social services, the PGASA will only take action in consultation with the statutory authorities. The PGASA has the right to suspend a person against whom allegations have been made pending the outcome of an investigation by the SAPS or social services or any resulting criminal proceedings.
- 5.15. The PGASA may impose interim protective measures, including the suspension of the Member or Associate where one or more of the following circumstances applies:
 - 5.15.1. The Member or Associate is believed to present a significant risk to other golfers;
 - 5.15.2. The reputation of the sport is at risk; and/or
 - 5.15.3. The participants ongoing presence may hinder investigations.
- 5.16. If the complaint is not considered to be a matter for the police, the PGASA Safeguarding Officer(s) should:
 - 5.16.1. Refer the complaint to GolfRSA if the complaint is not against a Member or Associate of the PGASA;
 - 5.16.2. Refer the matter to the GolfRSA Case Management Group if the complaint is against a Member or Associate of the PGASA.
- 5.17. The GolfRSA Case Management Group will consider the complaint and should determine to:
 - 5.17.1. Proceed with an internal investigation;
 - 5.17.2. Resolve the matter informally;
 - 5.17.3. Dismiss the complaint as unfounded or as insufficiently serious to require any action by PGASA.

6. CONFIDENTIALITY

- 6.1. Confidentiality is an important factor within the reporting, recording and processing of safeguarding concerns. The safeguarding concern should only be disclosed or discussed with those people within PGASA, GolfRSA, members and golf clubs/facilities that need to know in order to manage the case and to safeguard the individual(s) from maltreatment.

- 6.2. The only information regarding a safeguarding concern that will be discussed with the PGASA Board of Directors will be:
- 6.2.1. Gender of the complainant;
 - 6.2.2. Age of the complainant;
 - 6.2.3. Nature of the abuse;
 - 6.2.4. No other details may be disclosed.
- 6.3. Individuals receiving or having safeguarding concerns should avoid attempting to conduct enquiries into the concern. Our duty of care is to report the concerns to the appropriate person and/or organisation. This may be the SAPS, social services, or an appropriate Safeguarding Officer(s).

7. WHISTLEBLOWING

- 7.1. Although incidents can be reported directly by the affected individual, the term “whistle blowing” is used to describe a complaint relating to the conduct of an individual made by someone other than the affected person.
- 7.2. PGASA recognises that some individuals may be fearful of the consequences of making a complaint under these procedures, particularly where the perpetrator is in a position of authority. In these circumstances, where possible, the identity of the whistle blower will remain confidential.
- 7.3. Any person who makes a complaint in good faith must not be subject to reprisal or other adverse consequences because of submitting a report. These protections shall not apply to a person who intentionally makes a complaint that is false, vexatious, retaliatory or frivolous.

APPENDIX A:

1. GENERAL CODE OF CONDUCT

1.1. Everyone acting on behalf of the Professional Golfers Association of South Africa (PGASA) and its Member's, is obliged to abide by the code of conduct below.

1.2. It is therefore reasonably assumed that:

1.2.1 you have read the Safeguarding Policy;

1.2.2 you agree to fulfil your duty of care to safeguard children and vulnerable adults to the best of your ability; and

1.2.3 you agree to abide by the principles and behaviours as outlined in the Safeguarding Statement below.

1.3 Disciplinary action will be taken if the Safeguarding Statement is breached.

1.4 What is Your Duty of Care?

1.4.1 Anyone working with children or vulnerable adults has a legal and moral duty of care to do all they can to protect them from harm.

1.4.2 Specifically, this means:

1.4.2.1 A duty to behave in a way that does not place children or vulnerable adults at risk of harm;

1.4.2.2 A duty to report all safeguarding concerns about specific children or vulnerable adults to the PGASA and GolfRSA and ensure these concerns are addressed.

1.5 Safeguarding Statement:

1.5.1 As an employee, Member, Associate or representative of the PGASA, you confirm that you will abide by all the PGASA safeguarding expectations. You agree you will always:

1.5.1.1.1 Work in a way that respects children's rights and the rights of vulnerable adults, and places their best interests above all other considerations;

1.5.1.1.2 Conduct yourself with the highest professional standards in line with the PGASA Code of Ethics;

1.5.1.1.3 Act on safeguarding concerns swiftly and pass information to the appropriate safeguarding person so that action can be taken to reduce the risk of harm to children or vulnerable adults;

1.5.1.1.4 Treat everyone with equal respect, without discrimination, regardless of their gender, culture, ethnicity, age, religion, sexual orientation, or ability;

- 1.5.1.1.5 Work in a way that makes provision for children or vulnerable adults who require additional support due to their own needs or circumstances in order for them to access the same level of protection or opportunities that others may have;
 - 1.5.1.1.6 Respect cultural and religious differences when engaging with children and their families and vulnerable adults, and be sensitive to these in your interactions with them;
 - 1.5.1.1.7 Maintain appropriate professional and personal boundaries at all times whenever there is direct or indirect contact with children or vulnerable adults. This includes online and digital contact;
 - 1.5.1.1.8 Ensure that all data obtained through your role is handled with the highest regard for safety and privacy, including collection, storage and sharing of information where appropriate. All personal data and sensitive children's and vulnerable adult's data will be stored in line with the protection of personal information legislation;
 - 1.5.1.1.9 Ensure you have completed all safe recruitment checks that the PGASA requires of you with integrity and honesty.
- 1.5.1.2 Never:
- 1.5.1.2.1 Share personal details with children or vulnerable adults including online or digital information;
 - 1.5.1.2.2 Spend time alone with children or vulnerable adults, where your actions cannot be accounted for;
 - 1.5.1.2.3 Initiate physical contact with a child or a vulnerable adult (including hugging, picking them up) except when providing manual support after receiving explicit consent from the golfer;
 - 1.5.1.2.4 Engage in any physical abuse of a child or adult at risk (including hitting, slapping, shaking, throwing, pushing or otherwise causing physical harm);
 - 1.5.1.2.5 Engage in any sexual activity (contact or non-contact) with a child or vulnerable adult (including indecent exposure, exposure to pornographic material, sexual teasing or innuendo, inappropriate touching including penetrative or non-penetrative acts, or use of adult sex workers);

- 1.5.1.2.6 Engage in any form of financial or material exploitation (including stealing, fraud, misuse or misappropriation of property, possessions or benefits) behaviour through or during your work as a PGASA Member or Associate;
- 1.5.1.2.7 Perform tasks of a personal nature for a child or vulnerable adult;
- 1.5.1.2.8 Endorse the participation of a child or vulnerable adult in abusive activities (e.g., bullying, hazing, neglect, withholding medication, food or shelter, or ignoring medical, physical or emotional needs);
- 1.5.1.2.9 Emotionally or psychologically abuse a child or vulnerable adult by acting in a way that shames or degrades them (including threatening to hurt or abandon, humiliating, blaming, controlling, overprotecting, isolating or intimidating).