

Safeguarding Policy (March 2026)

1. About this Policy
 - 1.1 The Naval Children's Charity (NCC) has a duty of care to safeguard from harm all children, young people and adults at risk. The NCC has adopted this safeguarding policy to ensure the safety and protection of all children, young people and adults at risk involved with the charity.
 - 1.2 The safeguarding policy, principles and procedures apply to all NCC's activities, e.g., within the office, online, at external events and activities carried out within centres. To achieve this, we need to ensure we work effectively together to make any external verification, moderation or other awarding related activities carried out are safe and secure for all.
 - 1.3 This Policy is divided into the following sections:
 - Scope
 - Responsibilities
 - Definitions
 - Safeguarding online
 - Recruitment, Selection and Training of Staff/Trustees & Volunteers
 - Code of Practice
 - Confidentiality and information sharing
 - Recognition
 - Response
 - Reporting
 - Recording
 - Referral
2. **Review**
 - 2.1 We will review this policy annually or when legislative updates require.
3. **Scope**
 - 3.1 This Policy applies to all NCC's employees, contractors, casual workers, agency workers and Trustees.
4. **Responsibilities**
 - 4.1 All staff, volunteers, and trustees:
 - 4.1.1 Must ensure that all safeguarding concerns are reported and managed in line with this policy. While respecting confidentiality is important, safeguarding concerns

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must always take priority over personal or professional confidentiality obligations where a child or an adult at risk is at risk of harm.

4.1.2 Failure to appropriately report or manage safeguarding information may result in disciplinary action and, where applicable, referral to external safeguarding authorities.

4.2 Trustees and the Chief Executive:

4.2.1 ensure that the policy is implemented, monitored and reviewed.

4.2.2 have a legal obligation to report serious safeguarding incidents to the Charity Commission where there is a risk to beneficiaries, staff, or public trust in the charity.

4.3 Senior Leadership Team:

4.3.1 ensure the contents of the policy is communicated to all staff and other appropriate individuals.

4.3.2 support individuals who have received information regarding safeguarding issues.

4.3.3 support any child, young person or adult at risk who raises a safeguarding issue.

4.3.4 co-operate/liaise with the DSL during the response and referral stages.

4.3.5 maintain confidentiality of information.

4.3.6 support any subsequent action required by third party or internal inquiry.

4.4 Designated Safeguarding Lead (DSL):

4.4.1 Head of Operations shall be appointed DSL and a designated Caseworker shall be appointed Deputy DSL.

4.4.2 act as the Naval Children's Charity's DSL.

4.4.3 maintain, monitor and review this policy to ensure effectiveness.

4.4.4 ensure staff recruitment, induction and HR practices policies and procedures reflect safeguarding best practice and legislation.

4.4.5 ensure the Safeguarding Policy is available to all staff, contractors, casual workers and Trustees.

4.4.6 receive concerns about safeguarding.

4.4.7 respond to the concerns by identifying the most appropriate course of action.

4.4.8 act as a link with any external agencies.

4.4.9 maintaining confidential records of concerns and actions.

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4.4.10 submit high level report/s of any safeguarding issues.

4.5 Managers:

4.5.1 must ensure that their teams are familiar with the contents of this policy and appropriate responses required if a safeguarding concern/s arises.

5. Definitions

5.1 Safeguarding children

5.1.1 Safeguarding children duties apply to any charity working with, or coming into contact with, anyone under the age of 18.

5.1.2 Use resources and follow standards from the NSPCC for safeguarding children. Safeguarding children means to:

5.1.2.1 protect children from abuse and maltreatment.

5.1.2.2 prevent harm to children's health or development.

5.1.2.3 ensure children grow up with the provision of safe and effective care.

5.1.2.4 take action to enable all children and young people to have the best outcomes.

5.1.3 In England follow Working Together to Safeguard Children 2023

5.1.4 In Wales follow Wales Safeguarding Procedures.

5.2 Safeguarding adults at risk

5.2.1 Safeguarding adults at risk means protecting their right to live in safety and free from abuse and neglect. The NCC may have trustees, staff, volunteers, beneficiaries or other connections who are classed as adults at risk.

5.2.2 Safeguarding duties for adults at risk apply to any charity working with anyone aged 18 or over who:

5.2.2.1 has needs for care and support (whether or not the local authority is meeting any of those needs) and

5.2.2.2 is experiencing, or is at risk of, abuse or neglect and

5.2.2.3 as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect

5.2.2.4 An adult at risk of abuse may:

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5.2.2.5 have an illness affecting their mental or physical health

5.2.2.6 have a learning disability

5.2.2.7 suffer from drug or alcohol problems

5.2.2.8 be frail

5.2.2.9 In England follow guidance on the Care Act 2014

- 5.3 Child Abuse – can be through inflicting harm or failing to act to prevent harm. Abuse may be physical, emotional, or sexual and may take place in a family, institutional or community setting by those known to them or by a stranger.
- 5.4 Neglect – can be through inflicting harm or failing to act to prevent harm. Neglect is the persistent failure to meet a child’s basic physical and/ or psychological needs, likely to result in the serious impairment of the child’s health or development.
- 5.5 Abuse of Adults at risk – a violation of an individual’s human and civil rights by any other person or persons.
- 5.6 Physical Abuse – when someone physical hurts or injures by hitting, shaking, throwing, poisoning, burning, biting or scalding; suffocating, drowning or otherwise causing physical harm.
- 5.7 Sexual abuse – any sexual act to which a child or adult at risk has not consented could not consent always pressured into consenting. This could include full sexual intercourse, masturbation, oral sex or fondling, showing pornographic books, photographs or videos or taking pictures for pornographic purposes.
- 5.8 Psychological/Emotional Abuse - the persistent emotional ill treatment such as to cause severe and persistent adverse effects on the person’s emotional development. It may

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involve conveying to someone that they are worthless or unloved, inadequate or valued insofar as they meet the needs of another person. It may occur if someone is subjected to

- 5.9 Bullying - deliberate hurtful behaviour, usually repeated over a period of time where it is difficult for those being bullied to defend themselves. It may be:
 - 5.9.1 Physical, e.g. kicking
 - 5.9.2 verbal, e.g. racist comments
 - 5.9.3 emotional, e.g. ignoring and isolating
 - 5.9.4 sexual, e.g. unwanted physical contact
 - 5.9.5 bullying may also include more general activities that have the potential to create significant harm, such as downloading or using inappropriate material.
 - 5.9.6 Financial/Material Abuse – This includes theft fraud exploitation pressure in connection with wills, property or inheritance or financial transactions, or for misuse or misappropriation of property, possessions or benefits.
 - 5.9.7 Discriminatory Abuse - includes racist, sexist, that's based on the person's disability and other forms of harassment slurs or similar treatment.
 - 5.9.8 Patterns of Abuse - most incidents of abuse contain prior indications of the potential for abuse that have been missed, ignored or overlooked. These might include:
 - 5.9.8.1 offering extra support to individual young persons or adult at risks.
 - 5.9.8.2 placing themselves in closed rooms.
 - 5.9.8.3 a series of minor concerns about physical contact
 - 5.9.8.4 a history of frequent moves from jobs.

6. Online Safeguarding

- 6.1 Operating online presents unique safeguarding challenges related to protecting individuals from abuse and securing sensitive information. This section outlines the specific measures and responsibilities required to ensure our digital environments are safe and secure.
- 6.2 Content Management
 - 6.2.1 Ensure that all content published on the NCC's website and social media channels is carefully monitored and approved.
 - 6.2.2 Only designated personnel may post or update content, ensuring that all information is appropriate and aligns with our safeguarding standards.
- 6.3 Online Communication and Access

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- 6.3.1 Clearly define how users interact on our online platforms, including the use of secure messaging systems and moderated forums.
- 6.3.2 Implement access controls such as password protection and, where appropriate, age restrictions to safeguard user interactions.
- 6.4 Online Conduct and Monitoring
 - 6.4.1 All online behaviour is to be in line with the NCC's code of conduct, including the prohibition of abusive or inappropriate communication.
 - 6.4.2 Designated personnel have a duty to monitor online interactions involving children, young people, and adults at risk. Online safeguarding concerns may include, but are not limited to:
 - 6.4.2.1 Cyberbullying (e.g., harassment, intimidation, or repeated harmful behaviour online).
 - 6.4.2.2 Inappropriate content (e.g., sharing of explicit, offensive, or harmful material).
 - 6.4.2.3 Unsupervised or inappropriate communication between staff, volunteers, or external users and beneficiaries.
 - 6.4.2.4 Grooming or exploitation risks (e.g., suspicious interactions that could indicate predatory behaviour).
- 6.5 Digital Safety Training
 - 6.5.1 Ensure that all staff, volunteers, and trustees are trained to understand online risks and know how to keep themselves and beneficiaries safe in digital environments.
 - 6.5.2 Use secure settings (e.g., high privacy and password-protected meetings) to reduce exposure to online threats.
- 6.6 Service Suitability
 - 6.6.1 Verify that the online services provided by the NCC are suitable for our users. This includes employing age restrictions, clear terms of use, and regular content reviews.
- 6.7 Data Protection and Image Use
 - 6.7.1 Protect personal data by adhering to GDPR and ensuring that all online interactions are secure.
 - 6.7.2 Obtain necessary permissions before displaying any images or media of children or adults at risks on digital platforms.
- 6.8 Reporting Online Safeguarding Concerns

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- 6.8.1 Staff must immediately report any online safeguarding concerns to the Designated Safeguarding Lead (DSL) and document the issue in line with safeguarding procedures.
- 6.8.2 If there is an immediate risk, staff must follow emergency reporting procedures, including notifying the police if required.
- 6.8.3 Failure to identify, act upon, or report online safeguarding concerns may result in disciplinary action.

7. Recruitment and Selection of Staff/Trustees & Volunteers

- 7.1 The NCC is committed to creating a safe environment for all individuals and will conduct a thorough safer recruitment process for all staff and volunteers working with vulnerable people. This includes obtaining detailed references, conducting criminal background checks, and ensuring all candidates are aware of our safeguarding policies. We encourage open reporting of any concerns regarding potential staff members throughout the recruitment process.
- 7.2 All prospective staff/Trustees & Volunteers will complete an application form which asks for information about the applicant's post, a self-disclosure about any criminal record and an agreement to be checked if applicable by the Disclosure and Barring Service (DBS), PVG (Scotland) or AccessNI (Northern Ireland).
 - 7.2.1 <https://www.gov.uk/government/organisations/disclosure-and-barring-service>
 - 7.2.2 <https://www.mygov.scot/organisations/disclosure-scotland/>

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- 7.2.3 <https://www.nidirect.gov.uk/campaigns/accessni-criminal-record-checks>
- 7.3 Two references will be requested either from their previous employer or from someone known to them personally, but not a relative.
- 7.4 Evidence of identity will be required, such as a passport or a driving licence with photograph.
- 7.5 Interviews will contain structured safeguarding specific interview questions and risk assessments will be carried out for all roles.
- 7.6 Safer Recruitment Policy see Schedule 6 of Charity Policy Documents.

8. Training

- 8.1 All staff/trustees and volunteers required to undergo mandatory safeguarding training annually.
 - 8.1.1 [Online Safeguarding Courses | Accredited Training | iHASCO](#)
 - 8.1.2 DSL/Deputy DSL to undergo further training provided by Local Authority or Royal Navy RN FPS.
- 8.2 The DSL is to ensure training records are maintained centrally for compliance audits.

9. Code of Practice

- 9.1 These are guidelines for employees, contractors, casual workers, agency workers and Trustees when in contact with adults at risks or young people:
 - 9.1.1 Do not have lone contact with children, adults at risk or young persons. If this is unavoidable, ensure someone else is advised of what is taking place and why.
 - 9.1.2 Conduct contact in an open environment, avoiding private or unobserved situations.
 - 9.1.3 Maintain a safe and appropriate distance from each person. Do not have physical contact without that person's permission.
 - 9.1.4 Ensure that language is appropriate, clear and cannot be misinterpreted.
 - 9.1.5 Encourage open communication.

10. Confidentiality and Information Sharing

- 10.1 The NCC is committed to handling safeguarding concerns with sensitivity and discretion. However, safeguarding responsibilities override any personal or professional obligations of confidentiality when a child or adult at risk is at risk of harm.

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- 10.2 Staff must ensure confidentiality protocols are adhered to and information is shared appropriately. If in doubt about confidentiality or information sharing, seek advice from the DSL or SLT member.
- 10.3 The DSL or a SLT member will disclose any information about an individual to other members of staff securely and on the need-to-know basis, taking account of a better interests of the individual.
- 10.4 Confidentiality is designed to safeguard the best interests of the individual and must not be confused with protecting the management interests of the NCC.
- 10.5 Additionally, confidentiality must not prevent the sharing of safeguarding information if:
 - 10.5.1 A child or adult at risk is at immediate risk of harm.
 - 10.5.2 There is a legal obligation to report a safeguarding concern (e.g., suspected abuse, neglect, exploitation).
 - 10.5.3 Information is required by statutory safeguarding partners (e.g., social services, police, LADO).
 - 10.5.4 Sharing information will prevent a crime or protect others from harm.

In these situations, information must be shared without delay, following the appropriate reporting procedures outlined in this policy.

- 10.6 The Designated Safeguarding Lead (DSL) and/or the SLT will assess the appropriate level of information disclosure on a case-by-case basis.
- 10.7 All information shared must be documented, including the reason for disclosure and the agencies informed.
- 10.8 All information sharing must comply with:
 - 10.8.1 Data Protection Act 2018 (GDPR) – safeguarding concerns override data protection where necessary to protect an individual from harm.
 - 10.8.2 Information Sharing Advice for Practitioners (HM Government, 2018) – ensuring safeguarding data is shared lawfully and proportionately.
- 10.9 Naval Children’s Charity operates ‘Whistleblowing’ and Grievance policies if staff have any concerns about the conduct of their colleagues. (see Schedule 9 Whistleblowing Policy and Schedule 12 Grievance Procedure of Staff & Trustee Handbook).

11. Recognition

- 11.1 The ability to recognise behaviour that may indicate abuse or other safeguarding issues is of fundamental importance. Abuse can occur in a range of situations in which the child, adult at risk or young person may find themselves.

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12. Response

- 12.1 Appropriate response is vital. No report of a concern about possible abuse or other safeguarding issues should ever be ignored. In order to determine the most appropriate

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response, find out whether the allegation is from a young person or adult at risk against an employee, contractor, casual worker, agency worker, Trustee or another.

- 12.2 Is for disclosure from an individual alleging abuse to themselves or to another?
- 12.3 Is it for reporting of a concern or suspicion?
- 12.4 What, precisely, is alleged to of happened?
- 12.5 Detailed clarity is vital if you suspect or are told an adult or young person is being abused:
 - 12.5.1 Stay calm.
 - 12.5.2 Listen carefully to what is said.
 - 12.5.3 Allow them to speak, but be very careful not to say anything that may suggest or prompt a particular answer.
 - 12.5.4 Accept at face value what they say.
 - 12.5.5 Reassure them that they are being carefully listened to and do not promise to keep it confidential. Make it clear that it may be necessary to tell someone else who can help to sort things out.
 - 12.5.6 Reassure them they have done the right thing in speaking about the issue.
 - 12.5.7 Tell the child, adult at risk or young person what will happen next and with whom the information will be shared.
 - 12.5.8 Immediately report all safeguarding concerns to the DSL or a member of the SLT.
 - 12.5.9 Ensure your line manager is also made aware.
 - 12.5.10 All safeguarding concerns must be recorded using the Safeguarding Issue Reporting form found at Appendix 2. Ensure the following details are included:
 - 12.5.10.1 Name, date of birth and address of person reporting.
 - 12.5.10.2 If this issue has not occurred at the Naval Children’s Charity, contact numbers, mobile, work and home.
 - 12.5.10.3 Dates and times of abuse incidents.
 - 12.5.10.4 Record precisely what has been alleged.

13. Reporting

- 13.1 You are not responsible for deciding whether abuse or a safeguarding incident has occurred. That is a task for the professional agencies following a referral from the DSL and/or the

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Senior Leadership Team (SLT). Any concerns regarding allegations of abuse or concerns must be in the first instance be reported to the DSL, Deputy DSL and/or an SLT member, then followed up by completing the Safeguarding Issue Reporting form (at Appendix 2).

13.2 External Escalation Protocol

13.2.1 In some cases, safeguarding concerns may require escalation beyond the charity's internal reporting procedures. The Designated Safeguarding Lead (DSL) is responsible for assessing whether a concern should be reported to external safeguarding bodies, but all staff, volunteers, and trustees must be aware of when external reporting is mandatory.

13.2.2 Safeguarding concerns must be reported to external agencies in the following circumstances:

13.2.2.1 Immediate Risk of Harm: If a child or adult at risk is in immediate danger, staff must call 999 and inform the DSL immediately.

13.2.2.2 Suspected Criminal Activity: If an allegation involves suspected criminal behaviour (e.g., sexual abuse, physical assault, exploitation, online grooming), the DSL must report it to the police and local authority safeguarding teams without delay.

13.2.2.3 Allegations Against Staff, Trustees or Volunteers: Any safeguarding concern involving allegations against an NCC staff member, volunteer, or trustee must be reported to the Local Authority Designated Officer (LADO) within one working day.

13.2.2.4 Repeated or Unresolved Concerns: If concerns about a child or adult at risk persist despite internal interventions, or if the response from internal procedures is inadequate, the DSL must escalate the concern to social services or the relevant safeguarding partnership.

13.2.2.5 Failure to Follow Safeguarding Procedures: If there is evidence that the charity has failed to follow proper safeguarding procedures, trustees must report the incident to the Charity Commission under Serious Incident Reporting guidelines.

13.2.3 Documentation: The DSL must document the rationale for external escalation, including details of the concern, actions taken, and the external agencies notified. This documentation should be maintained securely in line with data protection protocols.

13.2.4 Reporting Timeframes

13.2.4.1 All concerns requiring external referral must be reported as soon as possible and no later than 24 hours after disclosure.

13.2.4.2 The DSL must document all referrals and retain a record of communication with external agencies.

13.3 The Charity Commission requires charities to report serious safeguarding incidents. If a serious incident takes place, it is important that there is prompt, full and frank disclosure to

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the Commission, even if the incident has also been reported it to the police, donors or another regulator.

13.4 A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

13.4.1 harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work).

13.4.2 loss of your charity's money or assets.

13.4.3 damage to your charity's property.

13.4.4 harm to your charity's work or reputation.

For the purposes of this guidance, "significant" means significant in the context of your charity, taking account of its staff, operations, finances and/or reputation.

13.5 Trustees have a legal obligation to report serious safeguarding incidents to the Charity Commission where there is a risk to beneficiaries, staff, or public trust in the charity. The following are examples of reportable incidents:

13.5.1 Allegations or concerns of abuse involving a staff member, volunteer, or trustee.

13.5.2 A failure in safeguarding procedures that has resulted in harm, or placed individuals at risk of harm.

13.5.3 A criminal investigation involving a current or former employee, volunteer, or trustee that relates to safeguarding.

13.5.4 A known safeguarding concern that was not managed appropriately, leading to external intervention (e.g., social services, police, regulator involvement).

13.5.5 A significant reputational risk to the charity due to a safeguarding issue (e.g., negative media coverage).

13.6 [How to report a serious incident in your charity - GOV.UK](#)

14. Recording

14.1 An accurate record should be made of what has been alleged using the words of the child, adult at risk or young person. Add, if appropriate, factual observations about the physical or emotional state of the individual sharing their concerns.

14.2 Information will be recorded and stored securely in line with NCC's data protection policy and will only be accessible to those who need to access it as part of the action to resolve a complaint or allegation.

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14.3 Safeguarding records should be securely stored for a minimum of 6 years (or longer if legal proceedings are ongoing).

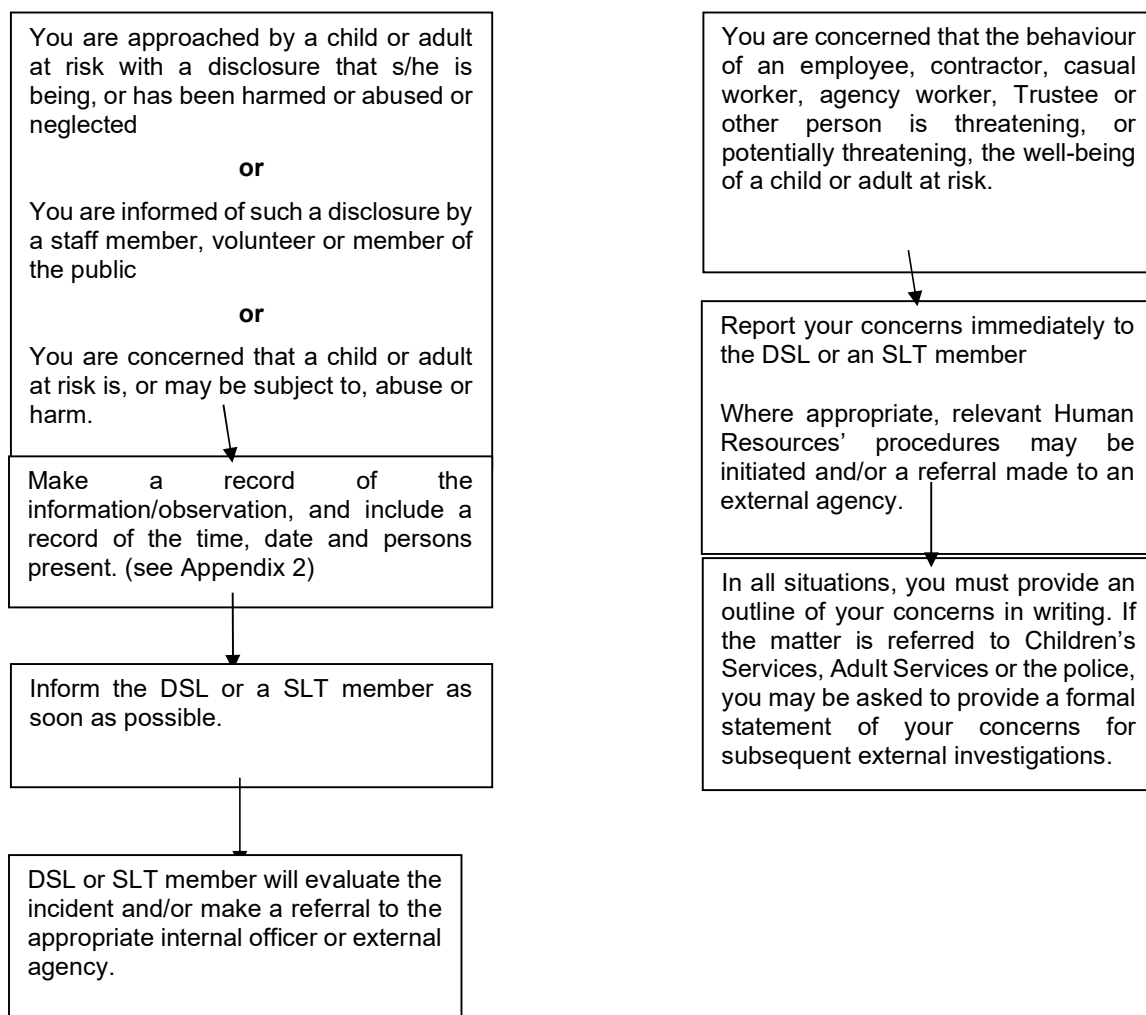
15. Referral

15.1 Only the DSL or an SLT member can make a decision to refer a complaint or allegation, having gathered and examined all relevant information.

16. Useful Links

- [Safeguarding and protecting people for charities and trustees - GOV.UK](#)
- [Safeguarding children and child protection | NSPCC Learning](#)
- [Safeguarding audits for the charity sectors - SCIE](#)
- www.hants.gov
- There are further resources charities can use for support when working online, such as [Internet Matters](#), [Get Safe Online](#) and [NSPCC](#).
- Read the [Commission's guidance on charities using social media](#).

Appendix 1: Flowchart of action to take in the event of a safeguarding allegation or concern



If you believe or suspect a child, young person or adult at risk is in immediate danger, call 999 and inform the DSL immediately.

Appendix 2: Safeguarding Issue Reporting Form

To be used to record all Safeguarding Concerns/Allegations.

All allegations of abuse or concerns about children, young people and adults at risk must be recorded without delay. This is to ensure that accurate information is passed on to the relevant person and that there is a written record of the key information.

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Item	Details
Full name of person completing report	
Immediate actions taken before referral	
Source/s of information	
Name of adult(s) at risk or child(ren)	
Name and role of employee, contractor, casual worker, agency worker, Trustee	
Date and location of incident(s)	
Confirmation of whether emergency services were contacted	
Nature of concern/allegation (attach additional sheet if required)	
Witness details (if applicable)	
Concern/allegation discussed with: (name and job role of member of staff)	
Outcomes of discussion	
Actions agreed	
Signed:	Date:
Actions resolved or details of any further actions as issue is addressed	
Signed:	Date: