



Mermaids Safeguarding Policy

Website Version (no internal links)

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1. Policy Statement

- 1.1. Mermaids is committed to the safeguarding and protection of all children, young people and adults at risk of abuse and recognise that the needs of children, young people or of people when they are vulnerable is paramount and that they have equal rights of protection. We have a duty of care to all children, young people and adults at risk of harm and abuse where we have concerns, irrespective of their method of engagement, or their direct engagement. We have a zero tolerance approach to child abuse.
- 1.2. Safeguarding is everyone's responsibility; for services to be effective each person and organisation should play their full part. For services to be effective they should be based upon a clear understanding of the needs and views of children and young people, and the particular [contextual safeguarding risks](#) which may be present for our community, and at the different ages and stages of development.
- 1.3. We recognise the serious issue of the abuse of children, young people and adults at risk and understand that this may take the form of physical, emotional, sexual, neglect and financial. We acknowledge the effects this abuse may have on people and their development and we accept responsibility for ensuring that all children, young people and adults at risk are safe and that their dignity and right to be heard is maintained.
- 1.4. Mermaids sets out a clear governance structure for safeguarding and appoints a named Designated Safeguarding Lead for the charity and will support them in their role which is to:
 - 1.4.1. Support and advise all staff, trustees and volunteers on all issues relating to safeguarding;
 - 1.4.2. Provide a point of reference to advise on safeguarding issues;
 - 1.4.3. Ensure a continual programme of training for all staff and volunteers
 - 1.4.4. Liaise with the named Deputy and team of Safeguarding Leads
 - 1.4.5. Promote safeguarding best practice within the charity with the support of the CEO, Senior Management and Trustees.
- 1.5. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England, Northern Ireland, Scotland and Wales. A summary of the key legislation is available from <https://learning.nspcc.org.uk/child-protection-system>. Mermaids also refer to the [Gillick competency and Fraser guidelines](#) to balance the need to ensure young people's voices are heard alongside the responsibility to keep them safe.

2. Purpose of the Policy

- 2.1. This policy sets out Mermaids' approach to the safeguarding and protection of all children, young people and adults at risk of harm and abuse. The needs and equal protection of these individuals is always paramount. For the purposes of this policy, as per statutory guidance, children are defined as all those individuals up to the age of 18.
- 2.2. The purpose of this safeguarding policy is to ensure procedures are in place and that people are clear about roles and responsibilities for children, young people and adults at risk in our care and engaging in our activities. We will use this policy to ensure that we provide a safe environment where there is informed vigilance as to the dangers of abuse and zero tolerance of abuse or neglect.
- 2.3. Government guidance is clear that all organisations working with children, young people, families, parents and carers have responsibilities and that all children and young people should be enabled to:
 - be healthy
 - stay safe
 - enjoy and achieve
 - make a positive contribution
 - benefit from economic well-being

"No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs" Equality Act 2010.

3. Definitions

- 3.1. Mermaids uses definitions of the term 'safeguarding' from statutory guidance.
- 3.2. Safeguarding and promoting the welfare of children is defined in the 2018 statutory guidance ['Working together to safeguard children'](#) (Appendix A: Glossary page 106) as:
 - 3.2.1. protecting children from maltreatment.
 - 3.2.2. preventing impairment of children's health or development.
 - 3.2.3. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
 - 3.2.4. taking action to enable all children to have the best outcomes.
- 3.3. Safeguarding adults at risk of harm and abuse is defined in the care and support statutory guidance issued under the Care Act 2014 as:
 - 3.3.1. protecting the rights of adults to live in safety, free from abuse and neglect.
 - 3.3.2. people and organisations working together to prevent and stop both the risks and experience of abuse or neglect.
 - 3.3.3. people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.
 - 3.3.4. recognising that adults sometimes have complex interpersonal relationships

and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

3.3.5. Whilst Mermaids understands the definition of an adult at risk as defined under the Care Act 2014 we also recognise that an adult can become vulnerable at any point in their life due to difficulties with mental health and/or other intersecting difficulties within their life circumstances.

3.4. *Safeguarding Concern* - A Safeguarding Concern is defined by Mermaids as a situation where a child, young person or adult at risk is at risk from anything that prevents the promotion of either points 3.2 and 3.3.

4. Mermaids Context

4.1. The welfare of children is paramount in all the work Mermaids does and in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse

4.2. We believe that children, young people and adults at risk should never experience abuse of any kind. We have a responsibility to promote the welfare of these individuals, to keep them safe and to practice in a way that protects them.

4.3. We use Trans as an umbrella term for those who are transgender, non-binary, genderqueer, genderfluid, agender, are of non-Western gender identities, those who have a trans history and those who are questioning.

4.4. Mermaids is mindful of the nuances and context that working with Trans young people entails. We recognise that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs and gender identity as well as the prejudice or stigma they may face as a result of this.

4.5. We recognise that working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

4.6. All concerns and allegations will be taken seriously and investigated thoroughly. Mermaids recognises that whilst some incidents and allegations will require the support and/or intervention of external agencies, others may be supported through existing internal support mechanisms centred around the individual.

5. Mermaids' Commitments

5.1. Mermaids charity will:

5.1.1. Have a commitment to safeguarding at all levels of the organisation and ensuring all staff are empowered to act if they have safeguarding concerns.

5.1.2. Have robust and clearly communicated procedures for safeguarding children, young people and adults at risk.

5.1.3. Have procedures for dealing with allegations against, and concerns about, staff, trustees and volunteers.

5.1.4. Treat all children, young people and adults at risk with respect and dignity as we celebrate their individuality, diversity and achievements.

5.1.5. Will promote a culture of listening to children, young people and adults at risk.

- 5.1.6. Commit itself to respond without delay, and appropriately, to any allegation or cause for concern that a child, young person or adult at risk may have been harmed, whether at one of our activities or in another context. We also commit ourselves to challenging the abuse of power by anyone in a position of trust.
- 5.1.7. Have agreements about working with other organisations and agencies including cooperating with the police and local authority in their investigation.
- 5.1.8. Use safe recruitment practices for all staff, volunteers and trustees, with specific focus on those working directly with children & young people.
- 5.1.9. We will carefully select and train all those with any responsibility within Mermaids, in line with Safer Recruitment principles, including the use of criminal record disclosures and registration with the relevant vetting and barring schemes.
- 5.1.10. We commit ourselves to the provision of support, advice and mandatory induction, and ongoing training for all workers, whether they are paid or voluntary, that will ensure that people are clear and confident about their roles and in so doing enable each person to fully understand their responsibilities and accountability. Each member of staff or volunteer will receive regular supervision and reviews.
- 5.1.11. Ensure positive ways of safeguarding and promoting the welfare of children, young people and adults who may be vulnerable.
- 5.1.12. In all these principles we will follow legislation, guidance and recognised good practice.

6. Responsibility

- 6.1. All our staff and volunteers have a duty to protect and promote the welfare of children. Due to the many hours of services we are providing, staff may sometimes be the first people to identify that there may be a problem. They may well be the first people in whom children, young people or adults at risk confide information that may suggest abuse or to spot changes in a child, young person or adults at risk' behaviour which may indicate abuse.
- 6.2. Mermaids believes that the safeguarding responsibility is shared by everyone working and volunteering with us, but with clear leadership and accountability structure running through the organisation.
- 6.3. Mermaids has a designated Safeguarding Lead (SL) and Deputy Safeguarding Lead who has the principal objective of overseeing and ensuring that our Safeguarding Policy is fully implemented. The welfare of the child is paramount and will always be the priority of the Safeguarding Lead. The Safeguarding Lead and Deputy can be contacted on 0808 801 0400. There is also a team of Duty Safeguarding Leads who are on a rota to ensure continuous cover.
- 6.4. The Safeguarding Lead's role includes:
 - 6.4.1. Promote safeguarding best practice within the organisation with the support of the CEO and Trustees.
 - 6.4.2. Referring a child to Children's Social Care if there are any concerns about suspected abuse.
 - 6.4.3. Liaising with other agencies and services as appropriate.
 - 6.4.4. Talking to parents about concerns (where appropriate).
 - 6.4.5. Providing support, advice and guidance to all staff and ensuring that they are aware of the Safeguarding policy.
 - 6.4.6. Seeking advice and support for staff from relevant agencies where appropriate.
 - 6.4.7. Support and advise all staff and volunteers.

- 6.4.8. Provide a point of reference to advise on safeguarding issues
- 6.4.9. Liaise with the safeguarding deputies.
- 6.5. In the Safeguarding Lead's absence then the Deputy Safeguarding Lead is contactable on 0808 801 0400. There is also a rota of duty safeguarding leads out of hours to complement the duty safeguarding capacity within services and the helpline team.
- 6.6. It is the responsibility of the CEO to ensure that all necessary measures are in place by the charity to safeguard children.
- 6.7. All staff will follow the procedures which are consistent with '[Working together to safeguard children](#)' (2018) and '[What to do if you are worried a child is being abused](#)' (2015).
- 6.8. It is not the responsibility of the staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and remain impartial. All concerns regarding the welfare of children at Mermaids must be recorded and discussed with the Safeguarding Lead, Deputy or Duty Safeguarding Lead prior to any discussion with parents.

7. Governance

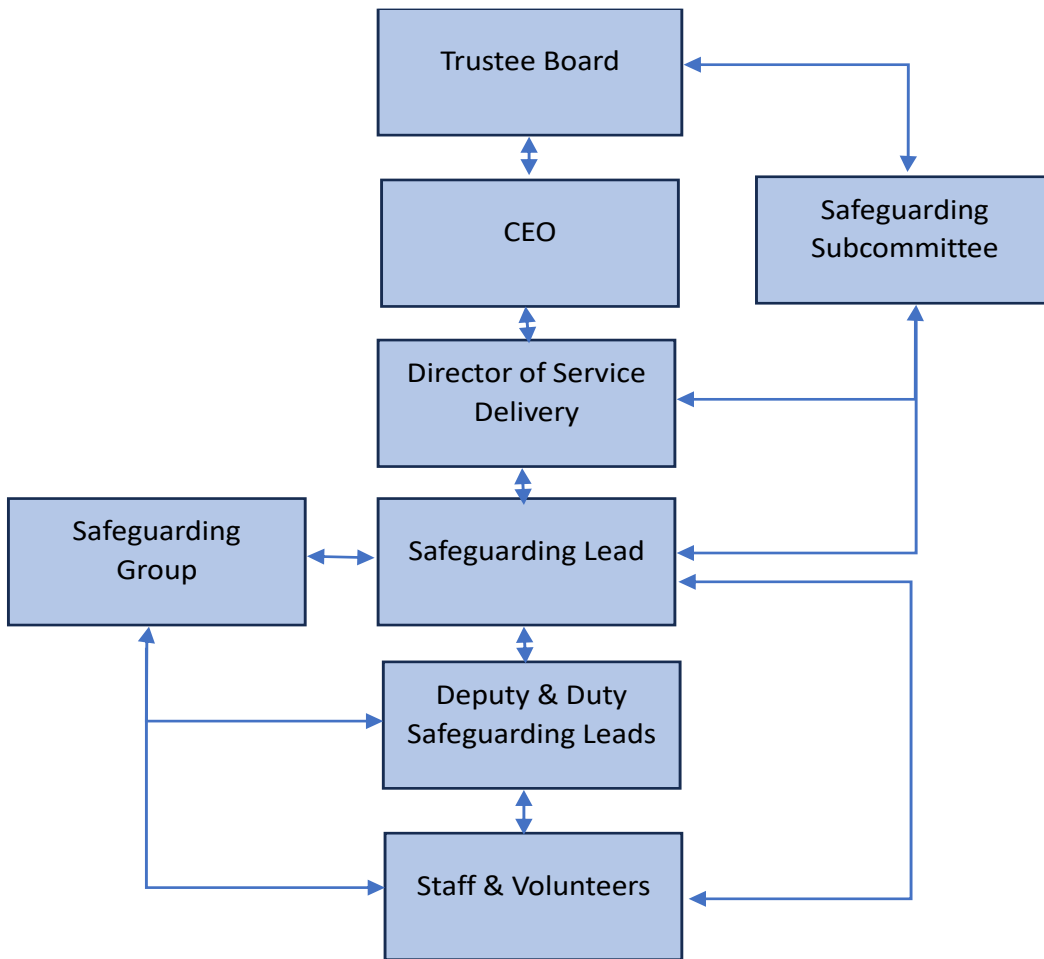
- 7.1. Mermaids has a clear governance structure for safeguarding decision making, reporting and escalation.
- 7.2. **Trustee Board** - Oversight is maintained by Trustees through regular Board meetings where safeguarding is a static agenda item. Additionally there are two designated safeguarding Trustee representatives who meet regularly with the Safeguarding Lead as part of the Safeguarding Subcommittee outlined below.
- 7.3. **Safeguarding Subcommittee** - The Subcommittee provides organisational oversight.
 - 7.3.1. The Subcommittee will be governed by an agreed Terms of Reference.
 - 7.3.2. Members will include the trustee safeguarding representatives, CEO, Director of Direct Service Delivery and Safeguarding Lead as a minimum.
 - 7.3.3. The Subcommittee will meet quarterly and focus on, but not limited to, the following:
 - Safeguarding related themes and trends.
 - Impact of changes in external guidance.
 - Impact of legislative change.
 - Lessons learned.
- 7.4. **Safeguarding Group** - The Safeguarding Group provides operational oversight and a link between the trustee safeguarding representatives and staff.
 - 7.4.1. The Safeguarding Group will meet on a monthly basis.
 - 7.4.2. The terms and objectives of the Safeguarding Group are documented in a [Terms of Reference](#).
 - 7.4.3. The trustee safeguarding representatives can attend a minimum of once a quarter. The Group Chair (Director of Direct Service Delivery) and designated Safeguarding Lead will also meet with the trustee safeguarding representatives one to two weeks prior to each trustee board.
- 7.5. **Senior Management** - Senior Management (CEO, Directors and Heads) are updated by the Safeguarding Group by the Safeguarding Lead at the Operational Team meeting, held

every two weeks. Safeguarding is a static agenda item for this meeting. This also gives opportunity for feedback to the Safeguarding Group.

- 7.6. **Designated Safeguarding Lead** - The Safeguarding Lead sits on the Safeguarding Subcommittee, Safeguarding Group and the Operational Team meeting. The Safeguarding Lead also has support from a Deputy Safeguarding Lead, who will also deputise in case of absence,
- 7.7. **Duty Safeguarding Leads** ensure continual operational cover. The names and contact details of the Duty Safeguarding Leads and Deputy are detailed in the Mermaids Safeguarding Procedure are noted on the Safeguarding rota.
- 7.8. **Escalation** - The escalation pathway for safeguarding concerns and related matters is as follows:
 - 7.8.1. The Safeguarding Lead and Deputy Safeguarding Lead are points of contact and escalation for safeguarding matters raised by staff, volunteers or trustees.
 - 7.8.2. Both the Safeguarding Lead and Deputy Safeguarding Lead can escalate to the Director of Direct Service Delivery.
 - 7.8.3. The Director of Direct Service Delivery escalates to the CEO.
 - 7.8.4. The CEO escalates to the Trustee Board.
 - 7.8.5. In the absence of the correct member of staff at each level of escalation the next level up should be contacted.
- 7.9. **Whistleblowing** - Mermaids has a whistleblowing policy that covers internal reporting of a safeguarding concern or incident that might involve a member of staff. The policy can be found in the [Mermaids Employee Manual, Policy 14 Whistleblowing](#).

Under “whistleblowing” anyone in our organisation may refer directly to either children’s social care services or the police if they are concerned that a child is at risk of harm and this policy is not being adhered to. All media enquiries will be handled by the communications team via press@mermaidsuk.org.uk.

- 7.10. The diagram below shows the lines of governance, accountability and information sharing. Escalation routes are detailed in the Safeguarding Procedure.



8. Confidentiality and Record Keeping

- 8.1. We have clear policies on confidentiality and information sharing, and these details will be made available to all adults, children, parents and carers through the charity’s website, through training and through an information pack provided for activities.
- [Confidentiality Policy](#)
 - [Privacy Policy](#)
 - [Data Protection Policy](#)
- 8.2. We fully endorse the principle that the welfare of children and young people override any obligations of confidence we may hold to others. Individual cases will only be shared or discussed on a “need to know” basis. Information pertaining to a child or young person’s gender identity or transgender status, will only be disclosed if directly relevant to the matter causing concern and only if it is essential to ensuring a child’s safety.
- 8.3. All Safeguarding records will be kept electronically and held securely in a single central system with access given to the designated Safeguarding Lead, Deputy Safeguarding Lead, Director of Direct Service Delivery, the CEO and those involved in direct service delivery to those young people.
- 8.4. Records will be kept as required based on [GDPR guidance](#). Escalated Safeguarding Concerns will be kept for 6 years. All records will be destroyed in a suitable manner 6 years after last contact with the child, young person or adult at risk.

- 8.5. All staff, trustees and volunteers will be advised how to record a Safeguarding Concern and record taking good practice is detailed in the *Safeguarding Response and Reporting Procedure*.

9. Celebrating Children's Achievements

- 9.1. Mermaids are keenly aware of the legal requirement to maintain confidentiality and protect the identity of children and young people. Where appropriate, and with the support and prior agreement of parents and families, we aim to celebrate the achievements of all children and young people through awards and selective engagement in media productions and publications.
- 9.2. Mermaids will be particularly sensitive to the needs of gender diverse, gender questioning, and transgender children and their families when celebrating achievements.

10. Recognising Abuse

- 10.1. The key areas of recognised abuse are based on the 2015 statutory guidance '[Child abuse concerns: guide for practitioners](#)', but we recognise that these may be subject to change as guidelines and policies change over time. Mermaids will therefore keep these under regular review.
- 10.2. **Physical** - Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing significant harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
- 10.3. **Emotional** - Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone, may feature age or developmentally inappropriate expectations being imposed on children.
- 10.4. **Neglect** - 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 - protect a child from physical and emotional harm or danger;
 - ensure adequate supervision (including the use of inadequate care-givers); or
 - ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 10.5. **Sexual** - Sexual abuse involves forcing or enticing a child or young person to take part in

sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women and gender diverse people can also commit acts of sexual abuse, as can other children. This can take place on a 1:1 basis, as well as in families, institutions and in organised groups or networks.

- 10.6. Exploitation** - is when someone uses a child or adult at risk for financial gain, sexual gratification, labour or personal advantage. This can include trafficking and sexual exploitation as well as 'county lines', where illegal drugs are transported from one area to another, often across police and local authority boundaries usually by children or vulnerable people who are coerced into it by organised networks.
- 10.7. Domestic Abuse** - is violence or other forms of abuse that occurs in a domestic relationship. Abuse can be physical, sexual, emotional, economic or psychological actions or threats of actions that influence another person, including the sharing of, or threat of the sharing of intimate images, and can include stalking and harassment.
- 10.8. Harmful practices** - this includes a range of abusive practices including child marriage, forced marriage, female genital mutilation, breast ironing, abuse linked to faith or belief, and so called honour based violence.
- 10.9. Institutional abuse** - occurs when there is the mistreatment of a person from a system of power. The abuse can range from young people or adults at risk being neglected or suffering because of poor care practices within an organisation or care setting to targeted discrimination and physical or sexual harm.
- 10.10. Conversion practices** - involves any intervention which seeks to 'cure' or 'correct' someone's gender identity or sexual orientation, usually with a focus on suppressing individual identity and converting them to identifying as cisgender and heterosexual. It can include talking therapies and prayer, but more extreme forms can include exorcism, physical violence and deprivation.
- 10.11. Unsupported Household/Family** - Being in an unsupported household does not necessarily indicate that a child or young person is at risk, but as Mermaids supports and works with gender diverse, transgender and non-binary children and young people we need to be mindful that not all parents/carers/families are supportive of their children and that some young people in unsupportive households may be at risk.

Indicators that suggest a young person may be living in a hostile environment, include:

- A child or young person tells us that their parents/carers/families have voiced transphobic, homophobic views in the past, or currently, which means the child or young person is afraid to come out to them for fear of negative response.
- A child or young person tells us that their parents will not allow them to present in their affirmed gender and forces them to continue living as the gender assigned them at birth.
- A child or young person feels anxious to present in their affirmed gender around their parents/primary carers
- A child or young person tells us that their parents/carers/families use negative language towards them regarding their gender – for example using exclusionary or transphobic language.
- A child or young person tells us that their parents/carers/families shout at the child or young person regarding their gender – for example shouting "you will always be my daughter and I will never let you be a boy, never."
- A child or young person indicates in any way they feel unsafe. You must never put words into a child or young person's mouth but if any of the above has happened

- you should ask if they feel safe.
- A parent, family member or someone in a young trans person's life tells us that they have acted in any of the above ways towards a young trans person.

There will be times when a parent/carer/family member knows about a child or young people's gender and is unsupportive because they simply do not know how, what to do or say; in these cases, we should encourage the young person to ask them to phone the helpline so we can offer the support those parents/carers/family members need to move to a place of feeling they can affirm and support their child.

11. Response and Reporting of Safeguarding Concerns

- 11.1. It is important that all safeguarding concerns are responded to and reported as quickly as possible.
- 11.2. Mermaids will have a robust procedure and processes for handling disclosures, responding to and reporting Safeguarding Concerns. These will be documented in the [Safeguarding Response and Reporting Procedure](#).
- 11.3. All staff, volunteers and trustees will be made aware of, and informed on how to use the procedure and how to respond to a Safeguarding Concern.
- 11.4. The Safeguarding Response and Reporting Procedure will be reviewed annually by the Safeguarding Group.
- 11.5. Mermaids will keep a single central record for recording and managing all Safeguarding Concerns.

12. Risk Assessment

- 12.1. Mermaids has a [Risk Assessment Policy](#) and [Procedure](#) that document the charities approach and protocol with regard to risk assessment, which includes any matters relating to safeguarding.
- 12.2. All new services, events and activities should be risk assessed under the Risk Assessment Procedure. It is important that any identified safeguarding risks are owned and mitigated with appropriate measures, and escalated if necessary.
- 12.3. All risks will be recorded in a Risk Assessment Form - [Template Risk Assessment Form](#). Where appropriate, these should be managed via a Risk Register - [Template Risk Register](#).
- 12.4. Risks where a decision is required that relates to safeguarding young people's welfare, that is not already covered by existing policy or procedures, should be considered by the Safeguarding Group.

13. Safer Recruitment

- 13.1. Mermaids follows [NSPCC](#) and [Safeguarding Alliance](#) safer recruitment guidelines for recruiting all staff, trustees and volunteers.
- 13.2. We pledge to create a safe environment by ensuring the selection and appointment of all staff and volunteers is fair, safe and transparent, this is to:
 - 13.2.1. Attract only those appropriate to work within our organisation/community;
 - 13.2.2. Deter those who are unsuitable to work with children or young people;
 - 13.2.3. Identify those who are unsuitable to work with children or young people.
- 13.3. Mermaids will request either a standard or enhanced check from the Disclosure & Barring

Service (DBS) and Disclosure Scotland (PVG – Protecting Vulnerable Groups) for every new employee, trustee or volunteer. Staff, trustees and volunteers will be requested to join the Update Service and an update check will be carried out by Mermaids every two years for all trustees, staff and volunteers.

- 13.4. Mermaids will ensure that the recruitment and selection process is fair and consistent to all and our recruitment and selection practices reflect our commitment to safeguarding and promoting the welfare of all children and young people in our care. This includes ensuring that background checks are carried out consistent with our Safer Recruitment Policy.
- 13.5. Our safer recruitment commitment is further documented in the [Mermaids Safer Recruitment Policy](#).

14. Induction & Training

- 14.1. Mermaids will have a clear induction and safeguarding training strategy. This training will be delivered internally and will be based on external guidance and statutory requirements.
- 14.2. All new staff, trustees and volunteers will undertake the relevant safeguarding training before they are allowed to have direct contact with service users. This includes handling calls, web chat or emails on the Helpline or support at local groups.
- 14.3. Training for all staff, trustees and volunteers will be refreshed on a regular basis.

15. Staff Wellbeing

- 15.1. Mermaids is committed to protecting the health, safety and wellbeing of our staff members.
- 15.2. Our staff wellbeing commitment is further documented in our [Stress and Mental Wellbeing at Work Policy](#).
- 15.3. We recognise the importance of our duty of care obligations and have several wellbeing support provisions in place outlined within our [Staff Member Support Services](#).

16. Online Services

- 16.1. Mermaids takes its approach to the online safety and wellbeing of our members very seriously. Mermaids commits to this through:
 - 16.1.1. Ensuring robust procedures, processes and guidance that are reviewed on a regular basis.
 - 16.1.2. Ensuring content is appropriate and moderated where required.
 - 16.1.3. Ensuring that live online sessions are managed appropriately and have adequate staff and/or volunteers available to facilitate where children and young people are involved.
- 16.2. Mermaids provides online services to young people and families through our online [Forum](#). The Forum provides a gateway or portal to accessing many of the other services that Mermaids offers.
- 16.3. The online services include:
 - Forum Groups
 - What Now - 6 week programme for Parents/Carers

- Youth Drop In
- Parents/Carers online groups
- Youth Engagement projects

16.4. Mermaids will ensure that all online services are managed appropriately, and services will be delivered and divided by the age of the members engaged in those services. Accordingly, Mermaids splits online services into age specific categories. Members' age is verified as part of the Forum Onboarding Process.

- Parent/Carers
- Young People 18-19 years old
- Young People 16-17 years old
- Young People 12-15 years old

Mermaids does not provide online services for under 12 years olds. If services are to be provided these will be family-based with parents/carers in attendance who will have overall responsibility for their children and young people.

16.5. For any online service it is important that a risk assessment has been carried out in accordance with the Mermaids Risk Procedure (see section 9 - Risk Assessment). Where this service has either direct or indirect contact with service users it is important that safeguarding risks and measures have been carefully considered.

16.6. Online groups should either be held via the Mermaids Forum or another Mermaids approved platform such as Zoom or Google Meet.

16.7. Mermaids may also sometimes use messaging platforms such as Signal for specific projects; however these should be risk assessed and approved by a Director first.

16.8. Communication on platforms that are not authorised by Mermaids senior management are prohibited and should be discouraged at all times.

16.9. Mermaids will ensure a robust onboarding process is in place to enable access to its online services. Access to Mermaids online services is through membership of the online Forum. Service users are onboarded through the Forum Onboarding Process by the Helpline Services team. This process ensures that relevant checks and verification are done before giving access to the Forum and other services. This process will be reviewed 6-monthly by the Helpline Services Team and annually by the Safeguarding Group.

16.10. All members of the Forum will be asked to agree to a Code of Conduct as part of the onboarding process.

16.11. Mermaids online services will be robustly moderated where required and appropriate. Activity and posts on the Forum will be moderated by Moderators from the Helpline Services Team in accordance with the Forum Groups Moderation Guidance. This process will be reviewed 6-monthly by the Helpline Services Team and annually by the Safeguarding Group.

16.12. Safeguarding concerns raised in relation to any of Mermaids online services must be managed in accordance with this policy and the [Safeguarding Response and Reporting Procedure](#).

16.13. There is not currently any specific legislation or regulations governing the provision of online services to young people and adults at risk. At the time of writing this is being drafted in the Government's Online Safety Bill. However, there is different UK legislation, as well as UK Criminal Law, that govern the protection of young people and adults at risk online that Mermaids must comply with. These include, but not exclusive to, the following:

- Data Protection Act and GDPR (UK) 2018
- Defamation Acts 1996 and 2013

- Communications Act 2003 (UK)
- Computer Misuse Act 1990
- Malicious Communications Act 1988
- Protection of Children Act 1978
- Protection from Harassment Act 1997
- Suicide Act 1961

16.14. Mermaids uses the [UK Council for Internet Safety's](#) (UKCIS) advice as best practice. Two UKCIS papers are considered:

- [Child Safety Online - A Practical Guide for Providers of Social Media and Interactive services](#) 2018
- [Digital Resilience Framework](#) 2019

17. Activities and Events

- 17.1. All activity and event planning should start with a risk assessment carried out by the activity/event project lead. This should be managed in accordance with section 12 of this policy.
- 17.2. New activities/events should consider any existing policies or procedures. Where there are no relevant policies or procedures then plans must be considered by the Safeguarding Group.
- 17.3. As general guidance for activities/events please refer to the Charity Commission recommended guidance by the [NSPCC - Safeguarding and child protection standards for the voluntary and community sector](#) - see Standard 4 - Running safe activities and events.
- 17.4. Under 16 year olds must only attend Mermaids events and activities accompanied by a parent/carer. Where there might be an exception to this rule plans must be considered by the Safeguarding Group. 16-17 years olds may be allowed to attend unaccompanied but are required to provide emergency contact details through an agreed process.
- 17.5. A member of staff will be in attendance or where volunteer led, there will be clear lines of communication with the charity's Duty Safeguarding Lead, who will either be in attendance or on call.
- 17.6. All staff and volunteers involved with the activity or event must be aware of the current safeguarding response and reporting procedure, and know who to report to in the event of a disclosure or incident.
- 17.7. All activities and events will be subject to an appropriate Code of Conduct, which all attendees will agree to.
- 17.8. Volunteers will be supported in accordance with section 19 of this policy.
- 17.9. [NSPCC guidelines for adult to children ratios](#) should be used when producing guidance for, and running, any activities or events where under 18 years olds are involved.

18. Youth Engagement

- 18.1. Any youth engagement activities, events, service or projects must be conducted in accordance with this policy.
- 18.2. Mermaids has a Youth Advisory Panel which consists of young people aged 16-19 who meet regularly to discuss the services Mermaids offers and to give feedback to the Trustee Board. Safeguarding this group is paramount and we have related risk assessments for this panel in accordance with section 12 of this policy.

- 18.3. Please see point 17.4 for policy on accompanied and unaccompanied attendance at events and activities by young people under 18 years of age.
- 18.4. [NSPCC guidelines for adult to children ratios](#) should be used when developing any youth engagement activity, event, service or project.

19. Volunteer Management

- 19.1. Safeguarding is paramount in all aspects of volunteer management and considers:
 - the potential harm that volunteers can cause to service users, staff and other volunteers.
 - the right for volunteers to be safe from harm.
 - volunteers witnessing other people causing harm.
- 19.2. Volunteer recruitment and onboarding will adhere to our Safer Recruitment Policy to ensure volunteer applicants are suitable for the role.
- 19.3. All volunteers working with children, young people, and adults at risk will receive mandatory training on how to recognise and respond to a Safeguarding Concern.
- 19.4. Policies and guidance are in place for volunteers to keep themselves and others safe whilst carrying out their role documented in the Volunteer Management Policy.
- 19.5. All volunteers will sign a Volunteering Agreement before they start. By signing the agreement, volunteers confirm they have read, understood and will adhere to our expectations, policies and procedures.
- 19.6. Support and supervision will be provided to ensure volunteers continue to follow best practice in safeguarding.
- 19.7. Wellbeing measures are in place for all volunteers to create a safe and supportive volunteering experience. This is especially true for any volunteers affected by a Safeguarding Concern. We are also aware that volunteers' personal lives may affect wellbeing and put them at more risk of being harmed in their volunteer role.
- 19.8. Volunteers are made aware of our Whistleblowing Policy and are encouraged to speak up if they are aware of any wrongdoing within the organisation.
- 19.9. Points 19.1, 19.2 ,19.3, 19.8 and 19.9 also apply to Mermaids' trustees.

20. Continuous Improvement

- 20.1. Mermaids has an approach of continuous improvement with regard to safeguarding. This is managed through the Safeguarding Group and reviewed by the Safeguarding Subcommittee.
- 20.2. Our Safeguarding Policy and associated procedures, processes and guidance are reviewed and updated as required, and as a minimum of every two years.
- 20.3. Mermaids strives to constantly improve on its practices and processes to ensure that the charity has a fair and equitable approach to safeguarding young people and adults at risk. This includes challenging traditional approaches and oppressive systems or procedures, specifically in relation to transgender, non-binary and gender diverse young people and for black, brown, people of colour and ethnic minorities.

- 20.4. Mermaids therefore has a commitment to examine and consider [radical safeguarding](#) options as part of its internal review processes.
- 20.5. A [Safeguarding Action Plan](#) is reviewed on a monthly basis by the Safeguarding Subcommittee to manage progress on actions.
- 20.6. A lessons learned process will be used to ensure that all safeguarding incidents are reviewed, lessons logged and responsibility assigned to any resulting actions.
- 20.7. The Safeguarding Subcommittee will review themes and trends, and changes in external guidance and legislation, and advise where there is an impact on the charity. Impact on the charity will be reviewed and managed through the Safeguarding Group.