



Mermaids Safeguarding Policy

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Mermaids Safeguarding Policy Version 4

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Revision no.	Effective Date	Significant Changes
3	13/02/2024	Added additional definitions of abuse at 10 Added conversion practice Linguistic change - vulnerable adult changed to “adult at risk of abuse” Additional clarification, in line with procedure, to broader Duty Safeguarding Lead cover.
4	12/2/2025	Additional information about suicide, self harm and other at risk behaviours, as well as the Online Safety Act 2023

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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 adults 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 Deputies 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 and respected 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, or who we become aware of through our work. We will use this policy to ensure that we provide a safe environment where there is informed vigilance in recognising and responding to abuse and zero tolerance of abuse or neglect.

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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 for the purposes of this guidance in the 2023 statutory guidance [‘Working together to safeguard children’](#) (Appendix A: Glossary page 161) as:

3.2.1 providing help and support to meet the needs of children as soon as problems emerge

3.2.2 protecting children from maltreatment, whether that is within or outside the home, including online

3.2.3 preventing impairment of children’s mental and physical health or development

3.2.4 ensuring that children grow up in circumstances consistent with the provision of safe and effective care

3.2.5 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.

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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, neurodiversity, physical ability, 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 centered 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 and volunteers 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. Commit to working with other organisations and agencies to safeguard the welfare of children, young people and adults at risk, including cooperating with the police and local authority in their investigations, where appropriate.
 - 5.1.8. Use safe recruitment practices for all staff, volunteers and trustees, with specific focus on those working directly with children & young people.

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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. Staff and volunteers will receive regular supervision and reviews, proportionate to their roles.

5.1.11. Ensure positive ways of safeguarding and promoting the welfare of children, young people and adults who may be at risk. Wherever possible involve young people and adults in the process and decision making, unless doing so would put them further at risk.

5.1.12 Where possible, share information with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk.

5.1.13. 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, young people and adults at risk of harm. Due to the range of services we provide 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, to spot changes in a child, young person or adults at risk's behaviour which may indicate abuse or identify situations which may put someone at risk of harm.

6.2. Mermaids believes that the safeguarding responsibility is shared by everyone working and volunteering with us, backed by with clear leadership and accountability structure running through the organisation.

6.3. Mermaids has a Designated Safeguarding Lead (SL) and Deputy Safeguarding Leads who have 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 via the numbers detailed on the rota. There is also a team of Duty Safeguarding Leads who are on a rota to ensure continuous cover.

6.4. The Safeguarding Lead & Deputies role is to:

6.4.1. Ensure all Mermaids' work is safe and provided in line with our safeguarding policy.

6.4.2 Promote safeguarding best practice within the organisation with the support of the CEO and Trustees.

6.4.2. Assess whether a safeguarding concern requires escalation and refer a child, young person or adult at risk to Social Services if there are concerns about suspected abuse, maltreatment or risk of significant harm.

6.4.3. Liaise with other agencies and services as appropriate where there is significant risk of harm.

6.4.4. Talk to parents about safeguarding concerns where appropriate.

6.4.5. Provide training, support, advice and guidance to all staff and volunteers and ensure that they are working to the Safeguarding policy.

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- 6.4.6. Seek 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 and Duty Safeguarding Leads to ensure a consistent approach and a learning culture.
- 6.5. There is a rota of duty safeguarding leads out of hours to complement the duty safeguarding capacity within services and the helpline team.
- The role of the Duty Safeguarding Lead is to:
- 6.5.2. Assess whether a safeguarding concern requires escalation and refer a child, young person or adult at risk to Social Services if there are concerns about suspected abuse, maltreatment or risk of significant harm.
- 6.5.3. Liaise with other agencies and services as appropriate where there is significant risk of harm.
- 6.5.4. Talk to parents about safeguarding concerns where appropriate.
- 6.5.5. Seek advice and support for staff from relevant agencies where appropriate.
- 6.5.6. Support and advise staff and volunteers while on duty.
- 6.5.7. Liaise with the Safeguarding Deputies and Duty Safeguarding Leads to ensure a consistent approach and a learning culture.
6. It is the responsibility of the CEO to ensure that all necessary measures are in place by the charity to safeguard children, young people and adults at risk.
- 6.7. All staff will follow the procedures which are consistent with '[Working together to safeguard children](#)' (2023) 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 create a supportive and safe environment, 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 further action.

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, set out in the constitutional byelaws.
- 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, ahead of the Board meeting and focus on, but not limited to, the following:

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- Safeguarding related themes and trends.
- Impact of changes in external guidance.
- Impact of legislative change.
- Lessons learned.
- New guidance & service developments

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 and will be composed of representatives across the organisation, ensuring safeguarding is embedded in all aspects of our delivery. The agenda for this group is also shaped by the wider organisation with a monthly call out for emerging safeguarding issues.

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 have a standing invite to the safeguarding group meetings and minutes will be shared to ensure designated safeguarding trustees are kept abreast of developments.

7.5. Senior Management - Senior Management (CEO, Directors and Heads/Programme Leads) are updated on Safeguarding developments 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 2 Deputy Safeguarding Leads, who will deputise in case of absence.

7.7. Duty Safeguarding Leads ensure continual operational cover. The names and contact details of all Safeguarding Leads are detailed 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, Deputy Safeguarding Leads and Duty Safeguarding Leads are points of contact and escalation for safeguarding matters raised by staff, volunteers or trustees.

7.8.2. Deputy and Duty Safeguarding Lead can escalate to the Director of Direct Service Delivery, who is the Safeguarding Lead.

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, out of hours as needed.

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](#) for staff. For volunteers it can be found in the [Solving Problems Together Guidance](#).

Under “whistleblowing” anyone in the 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.

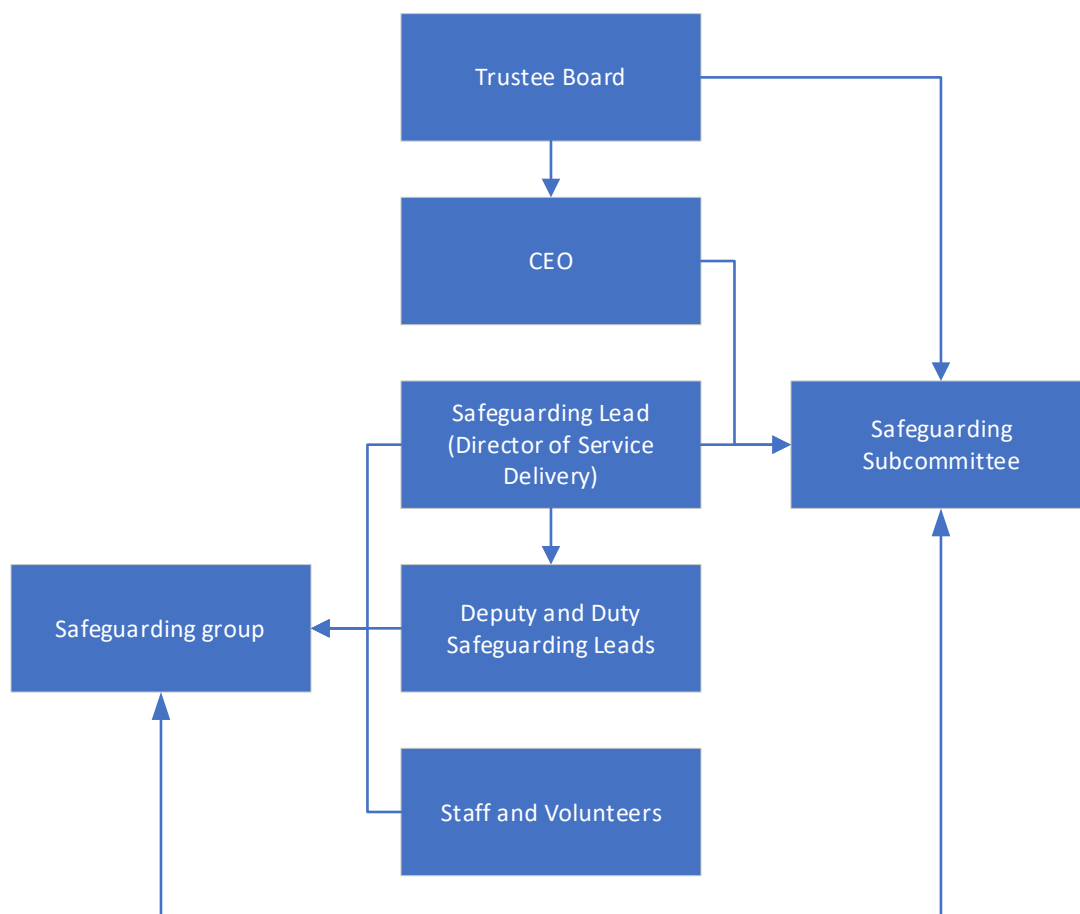
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7.10. The diagram below shows the lines of governance, accountability and information sharing. Escalation routes are detailed in the Safeguarding Procedure.



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 information provided for activities.

- [Confidentiality Policy](#)
- [Privacy 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, with the consent of the young person wherever possible, unless safeguarding concerns override this. 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 and wellbeing.

8.3. All Safeguarding records will be kept electronically and held securely in a single central system with access given to the safeguarding leads, the CEO, data protection officer and those involved in direct service delivery.

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8.4. Records will be kept as required based on [GDPR guidance and in line with our privacy policy](#). Escalated Safeguarding incident records will be kept for 1 year after we last have contact with the person 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*. The Safeguarding Lead will always be available to support with safeguarding & ensuring the appropriate records and kept and stored in line with policy.

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 young people, and their parents and families depending on age, we aim to celebrate the achievements of all children and young people through events, 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, with informed written consent in place before any media engagement.

10. Recognising Abuse

10.1. The key areas of recognised abuse is informed by the 2015 statutory guidance '[Child abuse concerns: guide for practitioners](#)', as well as those identified in the 2023 statutory guidance '[Working together to safeguard children](#)', 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 abuse**- 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 abuse**- 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.

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- ensure adequate supervision (including the use of inadequate care-givers).
- 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 abuse - Sexual abuse involves forcing, coercing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening or perceives the acts as abusive. 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 'personally connected' relationship, which can include partners, ex partners, as well as family members, whether or not they reside in the same household. It can be a single incident or a course of conduct. 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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:

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- 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”
- A child or young person indicates in any way they feel unsafe. If any of the above has happened we should always check with young people 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 contact the helpline so we can offer the support those parents/carers/family members need to move to a place where their child feels safe and supported.

11. Recognising Other risks of harm

We recognise that there can be a range of other factors which can cause a child, young person or adult to be at risk and when we may need to intervene.

11.2 Suicidal thoughts or intent

Suicidal thoughts, refer to a range of thoughts, wishes, or concerns about death and suicide. These thoughts should always be taken seriously, no matter how small they may seem. Suicidal ideation can vary in intensity and focus and can include:

Passive suicidal ideation: This is when someone may think about not wanting to be alive or wish they could disappear, but they do not intend or plan to act on those thoughts.

Active suicidal ideation: This is when someone has the intent to end their life, and may have a plan for how to do it.

Suicidal thoughts and behaviours exist on a spectrum. This can range from thinking about suicide, to making a plan, to attempting suicide, or even engaging in risky behaviours that could accidentally lead to death. Even if a person does not intend to die, their actions may still put them at risk of accidental harm or death. All of these situations should be treated as a serious risk and require attention and support.

11.3 Self Harm

Self-harm refers to the intentional act of inflicting physical injury or damage to one's own body as a way of coping with emotional distress or psychological pain. Self-harm includes a range of behaviours such as cutting, burning, hitting, or scratching their skin, self poisoning, inserting objects or washing in bleach. It is often not a suicidal act but rather a way to cope with overwhelming emotions, but there may be a risk of suicide depending on the method of self harm.

11.4 Self neglect can also be a cause for safeguarding concern and can include:

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- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Not taking prescribed medication
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

11.5 Other forms of risk

There are also a range of other actions which may involve a level of risk and which may require a safeguarding response.

These could include:

- Use of drugs, alcohol or substances
- Online behaviour, such as sharing intimate images or agreeing to meet people unknown to them
- Buying medication online

This list is not exhaustive. The key principle is whether the actions taken would pose a significant risk to the health and well being of the child, young person or adult at risk.

11.6. Strengths Based Approach & Harm Reduction

At Mermaids we use a strengths based approach and work to empower children, young people and adults at risk to live their best lives and thrive, building relationships of safety, identifying and building on their inner assets and strengths, identifying their existing support networks and working to expand and enhance the resources available to them.

Where children, young people or adults may be involved with activities that could put them at risk of harm we explore ways of building capacity to cope, make positive choices, preventing, mitigating and managing potential harm.

11.6.1 We do this through:

- creating a safe space to explore and identify their current situation and identify and assess any risks involved
- Identifying and building on existing positive coping strategies
- giving information on keeping safe in different contexts
- exploring choices and encouraging self care
- identifying sources of support and signposting to additional supports and specialist services
- sharing and signposting to high quality information

Where the level of risk is assessed as requiring additional support the safeguarding lead will escalate following the procedures outlined in section 12.

12. Response and Reporting of Safeguarding Concerns

12.1. It is important that all safeguarding concerns are responded to and reported as quickly as possible.

12.2. Mermaids has a robust procedure and processes for handling disclosures, responding to and reporting Safeguarding Concerns. These are documented in the [Safeguarding Response and Reporting Procedure](#).

12.3. All staff, volunteers and trustees receive training and are informed on how to use the procedure and how to respond to a Safeguarding Concern.

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12.4. The Safeguarding Response and Reporting Procedure will be reviewed annually by the Safeguarding Lead and reviewed by the Safeguarding Group.

12.5. Mermaids will keep a single central record for recording and managing all Safeguarding Concerns.

13. Risk Assessment

13.1. Mermaids has a [Risk Management Policy and Procedure](#) that document the charities approach and protocol with regard to risk assessment, which includes developments relating to safeguarding.

13.2. 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.

13.3. 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](#).

13.4. 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.

14. Safer Recruitment

14.1. Mermaids follows [NSPCC](#) and [Safeguarding Alliance](#) safer recruitment guidelines for recruiting all staff, trustees and volunteers.

14.2. 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:

14.2.1. Attract only those appropriate to work within our organisation/community; 14.2.2. Deter those who are unsuitable to work with children or young people; 14.2.3. Identify those who are unsuitable to work with children or young people.

14.3. Mermaids will request either a standard or enhanced check from the Disclosure & Barring Service (DBS)

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.

14.4. 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.

14.5. Our safer recruitment commitment is further documented in the [Mermaids Safer Recruitment Policy](#).

15. Induction & Training

15.1. 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.

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15.2. All new staff, trustees and volunteers will undertake the relevant safeguarding training specific to their role 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 or online groups.

15.3. Training for all staff, trustees and volunteers will be reviewed and refreshed on a regular basis.

16. Staff Wellbeing

16.1. Mermaids is committed to protecting the health, safety and wellbeing of our staff members.

16.2. As well as our [Health & Safety guidance](#) our staff wellbeing commitment is further documented in our [Staff Member Support Services](#).

17. Online Services

17.1. Mermaids takes its approach to the online safety and wellbeing of our members very seriously. Mermaids abides by the Online Safety Act 2023 and commits to this through:

17.1.1. Ensuring robust procedures, processes and guidance that are reviewed on a regular basis.

17.1.2. Ensuring content is appropriate and moderated where required.

17.1.3. 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.

17.2. 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.

17.3. The online services currently include:

- Forum Groups
- What Now - 6 week programme for Parents/Carers
- Youth Drop In
- Parents/Carers online groups
- Youth Engagement projects
- One off events such as film nights, external speakers and support related to specific external events

17.4. 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.

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.

17.5. For any online service development 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.

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

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16.7. Mermaids may also sometimes use messaging platforms such as Signal or Slack 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 many of 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. Where projects are conducted with young people outside the forum, alternative onboarding processes will be risk assessed and approved before proceeding.

16.10. All members of the Forum and online community developments 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 and safeguarding 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. The [Online Safety Act 2023](#) sets out specific legislation governing the provision of safe online services to young people and adults at risk. There are also a number of other pieces of 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 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. The Online Safety Act 2023 introduced several new criminal offences which came into effect on 31 January 2024. These offences cover:

- encouraging or assisting serious self-harm
- cyberflashing
- sending false information intended to cause non-trivial harm
- threatening communications
- intimate image abuse
- epilepsy trolling

16.15 New guidance is being developed to inform implementation of the act, but key considerations for our online service delivery inform:

- how we moderate our content to ensure that information is safe and age appropriate
- how we ensure the ages of the young people accessing our services
- how we rapidly remove inappropriate content
- how users are onboarded into services and the ways they can flag concerning content

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16.16 Any site that allows users to share content or interact with each other is in scope of the Online Safety Act. These laws also require sites to rapidly remove illegal suicide and self-harm content and proactively protect users from content that is illegal under the Suicide Act 1961. The Act has also introduced a new criminal offence for encouraging or assisting serious self-harm.

16.17 Services that are likely to be accessed by children must prevent children of all ages from encountering legal content that encourages, promotes or provides instruction for suicide and self-harm.

16.18 Ofcom is now the regulator of online safety and must make sure that platforms are protecting their users. Once the new duties are in effect, following Ofcom's publication of final codes and guidance, platforms will have to show they have processes in place to meet the requirements set out by the Act. Ofcom will monitor how effective those processes are at protecting internet users from harm. Ofcom will have powers to take action against companies which do not follow their new duties.

16.19 Our existing onboarding and moderation processes ensure we are compliant with the legislation.

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 \(2019\)](#)- see Standard 4 - Running safe activities and events.

17.4. Under 16 year olds must only attend Mermaids in person 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 in person events unaccompanied but are required to provide emergency contact details from an adult over 18. agreed on a case by case basis.

17.5 Young people aged between 12-17 can attend online events without parental permission, with supervision by trained Mermaids staff or volunteers.

17.6. 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.

17.7. 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.

17.8. All activities and events will be subject to an appropriate Code of Conduct, which all attendees will agree to.

17.9. Volunteers will be supported in accordance with section 19 of this policy.

17.10. [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

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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 a diverse group young people aged 16-19, with an upper age limit of 21 for members who complete a full term in role. YAP meet regularly to discuss and shape the work of Mermaids and to give feedback to inform the work across a range of teams in the organisation, as well as to the Trustee Board. Mermaids also has a Mango project, an online community of Youth Advocates aged 16-21 working for broader change. Safeguarding these groups is paramount and we have related risk assessments for both groups 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 induction and mandatory training on how to recognise and respond to a Safeguarding Concern, as well as ongoing refresher training.

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 safeguarding practice.

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.

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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 harm reduction and [radical safeguarding](#) options as part of its internal review processes.

20.5. The monthly Safeguarding Group and quarterly Subcommittee oversight reviews progress on actions.

20.6. The Safeguarding Group review the risk register monthly and ensure that all safeguarding incidents are reviewed, any lessons logged and responsibility assigned to any resulting actions. The safeguarding leads meet quarterly to ensure ongoing learning and development in safeguarding practice.

20.7. The Safeguarding subcommittee review themes and trends, and changes in external guidance and legislation, and review and inform guidance where there is an impact on the charity. Cross organisational impact on the charity will be reviewed and managed through the Safeguarding Group