



**N.O.W.S**  
National Online Wellbeing Services  
Emotional Wellbeing & Mental Health Service

## **SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY**

*For*

### **NATIONAL ONLINE WELLBEING SERVICES (N.O.W.S)**

#### **Introduction**

NATIONAL ONLINE WELLBEING SERVICES (N.O.W.S) is a company run for the following purpose:

To support children and adults to improve wellbeing and teach them the tools and techniques to cope with stress and anxiety, particularly through transitional periods of school and future life's challenges.

N.O.W.S is based at: Launchpad Southend Airport Business Park, Cherry Orchard Way, Rochford, Essex SS4 1YH

Company Number: 11580323

N.O.W.S has adopted this safeguarding policy and expects every adult working or helping at Company to support it and comply with it. Consequently this policy shall apply to all staff, managers, trustees, directors, volunteers, students or anyone working on behalf of the Company.

#### **Purpose of the Policy**

This policy is intended to protect children and vulnerable adults who receive any service from us, including those who are the children of adults who may receive services from us. Under this policy and as per the Children's Act 2017, the term children or child means any person who is under eighteen years of age.

N.O.W.S believes that no child or vulnerable adult should experience abuse or harm and is committed to their protection. This policy is intended to provide guidance and overarching principles to those who represent us as volunteers or staff, to guide our approach to protection and safeguarding.

All of the legislation that underpins our safeguarding policy can be found in appendix A at the end of this document.

Version number:	v2 February 2026
Policy approved by:	The Managing Directors, NATIONAL ONLINE WELLBEING SERVICES (N.O.W.S)
Policy owner:	Natasha Ralph
Date approved:	February 2026
Review date:	February 2027
This policy will be reviewed annually unless earlier review is indicated by changes to legislation or guidance.	



## **The Risks**

### **Children**

Children can be at risk of different forms of abuse and harm. It is important to recognise that abuse and harm can cover a wide range of circumstances and behaviours. For example:

- physical or emotional abuse
- neglect
- sexual abuse
- female genital mutilation (FGM)
- grooming and exploitation
- trafficking and modern slavery
- exposure to or infliction of domestic abuse
- bullying or cyber bullying
- exposure to other inappropriate content or behaviour, such as violence or criminal behaviour
- self-harm
- physical harm when engaging with activities without adequate supervision

The causal factors of any such harm and/or abuse can also be wide-ranging. For example, children can be placed at risk by family members, guardians, or by members of the community.

### **Vulnerable adults**

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- Has a reduction in physical or mental capacity
- Is in receipt of any form of healthcare
- Is detained in custody
- Is receiving community services because of age, health or disability
- Is living in sheltered or residential care home
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

## **Categories of abuse**

Abuse is a deliberate act of ill-treatment that can harm or is likely to harm a person's safety, wellbeing and development. Abuse can be physical, sexual or emotional. Abuse may not, however, fall easily into these categories and staff/associates are not expected to be experts in the field.

Neglect also constitutes abuse but can be defined as failing to provide or secure a child or vulnerable adult with the basic needs required for physical safety and wellbeing.

N.O.W.S recognises that a person's welfare is paramount and that all children and vulnerable adults - regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity - have the right to protection from all types of harm and abuse.

Children, young people and vulnerable adults can experience abuse in a number of ways. Forms of abuse that may affect children and vulnerable adults include:

- Abuse of trust
- Child sexual exploitation
- Child Trafficking



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- Discriminatory abuse
- Domestic violence or abuse
- Emotional Abuse
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Grooming
- Harmful sexual behaviour
- Modern slavery
- Neglect
- Online abuse
- Organisational or institutional abuse
- Physical Abuse
- Psychological or emotional abuse
- Radicalisation of children or vulnerable adults
- Sexual Abuse

These categories can overlap and an abused child or adult often suffers more than one type of abuse.

Disabled children are particularly vulnerable to abuse in any form. Safeguards for disabled children are essentially the same as for non-disabled children. Where there are concerns about the welfare of a disabled child, they should be acted upon in accordance with the procedures set out in this policy. The same thresholds for action apply. Where concerns are raised about a child or vulnerable adult who has communication difficulties, appropriate support, interpreting services and communication aids must be secured.

Everyone has a right to be safeguarded from abuse or neglect. There is a legislative framework in place to safeguard children and vulnerable adults through The Children Act 2017 and the Safeguarding Vulnerable Groups Act 2006 and Care Act 2014.

### **Safeguarding Principles**

Safeguarding these groups of people from harm and abuse is an essential responsibility for N.O.W.S. We are committed to ensuring that anyone who comes into contact with our services is properly safeguarded. Every person under this policy must ensure that they play an active role in ensuring that children and vulnerable adults are properly safeguarded.

Every person under this policy holds responsibility for:

- remaining alert and aware of possible safeguarding risks
- guarding individuals against harmful environments with appropriate actions (for example, adequate supervision or ensuring safe environments)
- taking positive steps to maintain the safety and wellbeing of people engaging with us as a Company
- reporting concerns expeditiously and appropriately, in line with our children and vulnerable adults protection procedures
- understanding the duty to report specific concerns (and understanding how this interplays with confidentiality)
- challenging any inappropriate or harmful behaviour of any other adult and reporting this accordingly
- acting appropriately in the presence of children
- not taking any inappropriate risks
- not smoking, drinking or taking any form of illicit substances in the presence of children and vulnerable adults



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### **Safeguarding Officer**

Any question, report or concern in relation to the safeguarding of children and vulnerable adults should be shared with our Safeguarding Officer:

Name: Natasha Ralph  
Email: [Natasha@nows.org.uk](mailto:Natasha@nows.org.uk)  
Telephone: 0345 366 9755

### **Confidentiality and Data Protection**

All personal information we may process relating to children and vulnerable adults, shall be processed and stored in accordance with our data protection privacy policy which can be located on our website and in our staff handbook.

### **Whistleblowing**

It is important that staff within N.O.W.S have the confidence to come forward to speak or act if they are unhappy with anything. Whistleblowing occurs when a person raises a concern about dangerous or illegal activity, or any wrongdoing within their organisation. This includes concerns about another employee. There is also a requirement by N.O.W.S to protect whistle-blowers.

If concerns about a member of staff, a suspicion that a child or vulnerable adult is being abused or neglected, or a suspicion that an activity is taking place that could place a person at risk. If the concern relates to a member of staff, a company director or the safeguarding office should be advised. In any situation where there is a suspicion of abuse, the welfare needs of the child or vulnerable adult must come first even where there may be a conflict of interest (e.g. where the suspected perpetrator maybe someone who is responsible for the safety and welfare).

### **Training**

N.O.W.S will ensure an appropriate level of safeguarding training is available to its Employees, Volunteers and any relevant persons linked to the organisation who requires it (e.g. contractors). N.O.W.S also commit to an annual safeguarding training update for all staff, volunteers and contractors.

- For all employees who are working or volunteering with children and vulnerable adults, this requires them as a minimum to have awareness training that enables them to:
- Understand what safeguarding is and their role
- Recognise an individual potentially in need of safeguarding and take action
- Understand how to report a safeguarding concern
- Understand dignity and respect when working with children and vulnerable adults
- Have knowledge of this Safeguarding Policy

### **Responding to a Safeguarding Concern**

Where a child or vulnerable adult is at immediate risk of serious harm, any adult present should call 999. Thereafter, the Safeguarding Officer and/ or a senior member of the management team should be contacted as soon as is reasonably practicable.

Where there is a safeguarding concern but no immediate risk of serious harm, the adult who has heard or witnessed this concern should consult with the Safeguarding Officer and /or a senior member of the management team as soon as practicable and by no later than the end of that same day.

Where any child or vulnerable adult makes a disclosure relating to harm or abuse to an adult, it is important to:



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- Listen calmly and carefully, showing that their views are taken seriously
- Provide an appropriate and honest level of reassurance
- Avoid interrogating children and asking probing, intrusive and/or leading questions
- Avoid making false promises regarding secrets and confidentiality with the child (because any concern of abuse/harm must be shared with the Safeguarding Officer and /or a senior member of the management team and any subsequent safeguarding referral)
- Make a confidential *written* record of the discussion in the dashboard session notes, either during the discussion or immediately afterwards. The record should include the key details of the disclosure together with any relevant times, dates, places and people concerned. Audio and video recordings of children making disclosures should be avoided
- Refer all relevant information to the Safeguarding Officer and /or a senior member of the management team as soon as practicable afterwards, and by no later than the end of the day

N.O.W.S employees, volunteers and contractors when working with children and/or vulnerable adults should not:

- Ask overly personal questions, including those about age or appearance (unless specifically related to a work project, in which case it must be documented)
- Send/give out material that could be considered offensive, which includes material on social media sites
- Suggest or imply a personal relationship could develop
- Take an aggressive or bullying tone
- Have physical contact or share any personal details about themselves
- Offer or accept personal gifts
- Agree to keep a secret or ask a child or vulnerable adult to keep a secret
- If a child discloses safeguarding concerns these cannot be kept secret and must be shared as appropriate

Upon receipt of any safeguarding concern, the Safeguarding Officer and/or senior manager shall consult with any other relevant persons and will make any appropriate referrals to the relevant authorities, such as the applicable Local Authority Children's Services department.

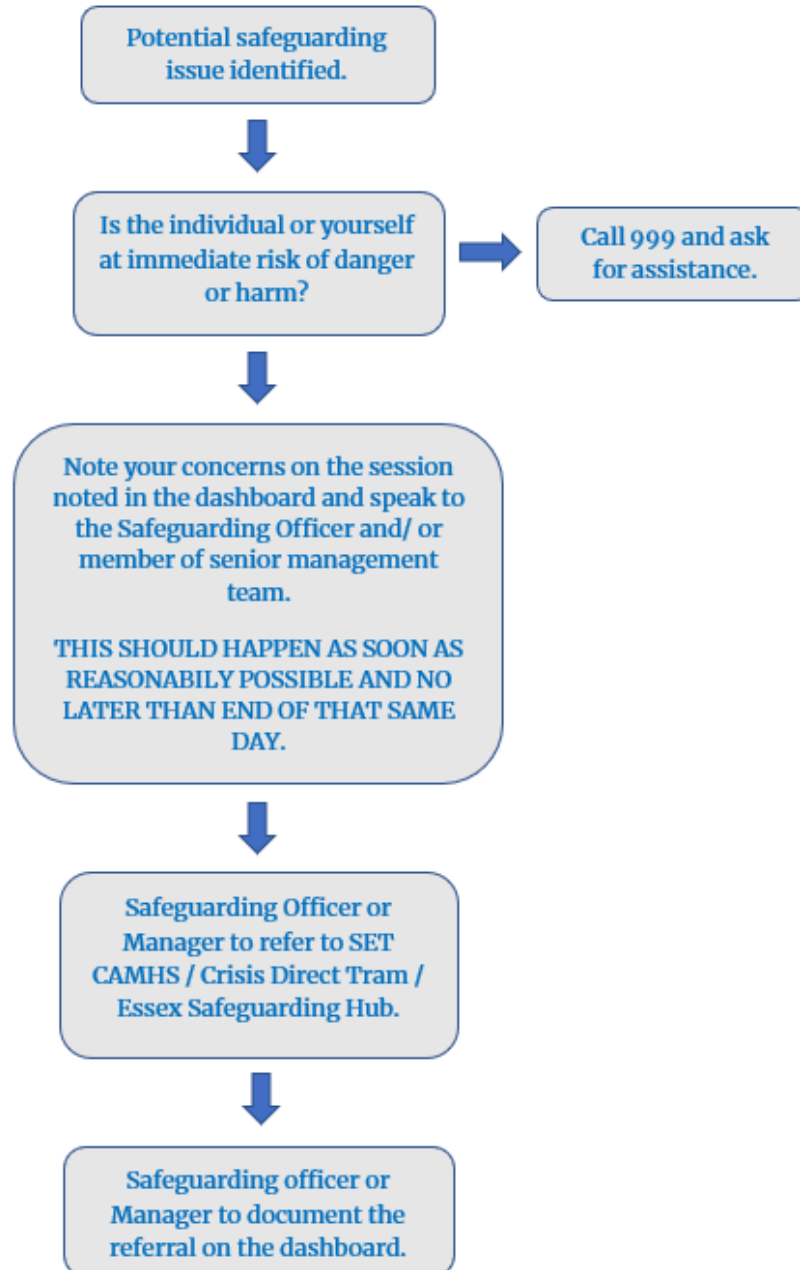
### **Procedure**

Procedures for raising concerns about a child or vulnerable adult.



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### **Reporting concerns about other adults within N.O.W.S**

Where any person has a concern regarding the conduct of an adult connected to N.O.W.S, which poses or may pose a safeguarding risk to children or vulnerable adults such as:

- harming an individual either physically or emotionally
- exposing an individual to behaviour which may cause physical or emotional harm
- engaging in criminal activity concerning the individual

This must be raised in the first instance with the Safeguarding Officer (or where this is not appropriate, a different senior member of the organisation) so that the next appropriate steps may be agreed and actioned. We recognise that there could be circumstances where a person may need to report a matter that has taken place in a setting outside of the person's engagement with N.O.W.S.

Usually, any appropriate steps following a safeguarding referral in respect of an individual connected to N.O.W.S will include either:

- further initial enquiries
- escalation to the applicable Local Authority Designated Officer for assessment and/or the police for investigation. (Essex duty LADO (Local Authority Designated Officer) Telephone: 03330 139 797)
- instigation of any appropriate disciplinary, formal investigation processes and suspension of any person concerned within N.O.W.S
- a referral to the Disclosure and Barring Service, Disclosure Scotland or Access Northern Ireland, or any other relevant regulatory bodies

Any person within N.O.W.S who has allegations made against them shall be informed properly in a formal meeting of the particulars of the allegations and the relevant next steps which shall be taken. Such a meeting should ordinarily be held by the Safeguarding Officer. On certain occasions, such a meeting may not be convened until this has been approved by any authorities involved (such as the police or the relevant Local Authority).

Any person from within N.O.W.S who has allegations made against them shall be treated fairly. All enquiries, investigations and decisions taken shall be just and fair, with the safety of any child or vulnerable adult concerned at the heart of the process.

Any person from within N.O.W.S who makes an allegation against another person from within N.O.W.S shall be listened to, taken seriously and shall be treated fairly and justly throughout the process of enquiries, investigations and decision making.

### **Disclosure and Barring Service (DBS) Access Northern Ireland, Disclosure Scotland Checks**

The Protection of Freedoms Act 2012 under the Safeguarding Vulnerable Groups 2006, The Children and Social Work Act 2017 and Care Act 2014 sets out that it is an offence for an employer to knowingly employ someone in a regulated position if they are barred from doing so. Where there is regular contact but not 'regulated' i.e. supervised it is still possible to consider an enhanced criminal records check but this will not include a check of the barred list through the Disclosures and Barring Service (DBS).

Checks under the appropriate legislation should be undertaken wherever required. The groups of people we will usually undertake checks with the DBS, Access Northern Ireland, and Disclosure Scotland (whichever is applicable) in relation to are:

- Coaches



Wherever we deem it is necessary and appropriate to remove any individual from a position of work in a activity which is regulated under the relevant legislation, we shall also be obliged to make a referral to the DBS, Access Northern Ireland and Disclosure Scotland.

DBS update checks are carried out every 3 years.

### **Safeguarding Children and vulnerable adults at N.O.W.S**

#### **Responsibilities and planning**

Although the Safeguarding Officer will hold ultimate responsibility for overseeing the safety of children and vulnerable adults present at N.O.W.S, all individuals under this policy must also play an active role in ensuring the safety of children and vulnerable adults at all times.

Where a certain type of event, activity or trip is taking place, we may issue an additional code of conduct, policy, or some specific other requirements which is specific to that occasion. Any such additional documentation will be made available to all those concerned (staff members, parents, guardians etc.) in advance. They should be read carefully and adhered to.

Appropriate background checking shall be undertaken wherever we are legally required to do so in respect of adults who are engaged by us (see the relevant section above).

#### **Venues**

The location for any events, activities and trips which are held by us shall always be risk assessed properly in reference to their suitability and safety. Fire and safety procedures and precautions shall be made clear to all those involved.

#### **First Aid**

Any accident or injury concerning a child should be brought to the attention of the nearest first aider or parent/guardian and should thereafter be formally reported to the Safeguarding Officer.

#### **Consent forms**

We shall always obtain written consent from a parent or guardian in the following circumstances:

For N.O.W.S to commence one on one coaching with a child or vulnerable adult.

Consent will be obtained either by email or a form which can be completed in person.

Consent forms will include emergency contact details and will set out any specific safety needs/requirements for children and vulnerable adults.

All consent forms will be kept secure and shall be stored in accordance with our data protection privacy policy.

#### **Supervision**

Wherever a child attends our premises alongside their parent or guardian, parents and guardians should ensure that children are properly supervised.

#### **Managing Behaviour of Children Generally**

Whenever any adult engaged by us is faced with challenging or inappropriate behaviour from a child or with conflict between children, they must:



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- treat each child fairly and equally
- approach the situation in a calm and neutral manner
- only ever use physical restraint/intervention in order to protect the immediate safety of a person, for example to prevent an injury or harm either to the child or others
- wherever it is justified to physically restrain a child or to physically intervene, the amount of force used should be kept to the absolute minimum taking into account the risk posed
- make a written record of the incident and ensure this is reported appropriately to the Safeguarding Officer and/ or a senior member of the management team

### **Managing Risks Posed by Other Children**

It is important for all adults engaged by us to recognise that children can face harm from their peers. This can commonly take the form of bullying. Bullying can be defined as any behaviour which is:

- repeated; and
- has the intention of hurting somebody either physically or emotionally

Bullying can sometimes be motivated by prejudices based on certain groups, for example gender, race, religion or sexual orientation. Bullying can often include:

- physical harm perpetrated against another child
- name calling and threats
- cyberbullying (threats and abusive comments made via technology)

Any instance of bullying or concern relating to possible bullying between children at any event or activities arranged by us will usually be dealt with by one of our coaches or managers in the first instance.

Where any behaviour amounting to bullying continues following this, the safeguarding office and/ or the senior management team will decide which steps will need to then be taken.

All steps in relation to the prevention or management of bullying should be taken in consultation with the Safeguarding Officer.

### **Photography**

On some occasions, we may take photographs featuring children. We recognise that photography of children carries risks, such as:

- the potential for images to be re-used, shared or adapted in a damaging or inappropriate manner
- the general risk of sharing images and the impact this could have on child's public image as they grow older

In view of these risks, we will:

- always ask for written permission from a child and their parent/guardian before taking and sharing any image of them
- always ensure that a child and their parent/guardian are properly informed how an image will be used and shared
- always ensure that a child's identity is protected as far as is possible within any published material
- ask that parents, guardians, children and any other person connected to them who may wish to share any of our published images which features other children to refrain from doing so unless they have the permission of the other children and their parent/guardian
- always store photos in accordance with our data protection policy



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We ask that any members of the public attending our premises, events or activities do not take photographs.

### **Legal Framework**

This policy has been drawn up in accordance with all relevant and applicable legislation and guidance available to N.O.W.S in the jurisdictions it operates within.

This Policy is approved and robustly endorsed by NATIONAL ONLINE WELLBEING SERVICES (N.O.W.S).

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Signed: Kelly Swain

Designated Safeguarding Lead (DSL): Kelly Swain, 07824 583154 [kelly@nows.org.uk](mailto:kelly@nows.org.uk)  
Deputy DSL: Natasha Ralph, 07787 598519 [natasha@nows.org.uk](mailto:natasha@nows.org.uk)

Data Protection Lead: Natasha Ralph, 07787 598519 [natasha@nows.org.uk](mailto:natasha@nows.org.uk)



## **APPENDIX A**

All staff, managers, trustees, directors, volunteers, students or anyone working on behalf of the Company are required to adhere to the following arrangements and legislation:

The Crime and Disorder Act 1998

Female Genital Mutilation Act 2003

Mental Capacity Act 2005

Convention on the Rights of Persons with Disabilities 2006

Mental Health Act 2007

Children and Families Act 2014

Modern Slavery Act 2015

Serious Crime Act 2015

United Nations Convention on the Rights of the Child 1989

Children Act 1989 and 2004

Promoting the Health of Looked After Children Statutory Guidance 2015

Children and Social Work Act 2017

Working Together to Safeguard Children Statutory Guidance 2018

The Working Together to Safeguard Children Guidance 2023

Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff 2019

Looked After Children: Knowledge, skills and competences of health care staff 2015

The Care Act 2014

Adult Safeguarding: Roles and Competencies for Health Care Staff 2018

Keeping Children Safe in Education 2023

The Equality Act 2010

The Human Rights Act 1998

The General Data Protection Regulation (GDPR)

Care & Support Statutory Guidance- Section 14 Safeguarding