



NATIONAL RIFLE ASSOCIATION

SAFEGUARDING POLICY

Adopted by Council on 03 February 2023

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1. NRA Safeguarding and Welfare

1.1 Policy Statement

- 1.1.1 The NRA recognises that the welfare and interests of children and adults at risk are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation or socio-economic background, all children have a positive and enjoyable experience of shooting in a safe and child-centred environment.
- 1.1.2 The NRA is committed to creating and maintaining a safe and positive environment and an open, listening culture, where people feel able to share concerns without fear of retribution.
- 1.1.3 The NRA recognises and acknowledges the duty it has to proactively safeguard and promote its beneficiaries and those who work for or with them or otherwise come into contact with the charity or its Representatives (as defined below). The NRA will, therefore, seek to ensure that reasonable steps are taken so that members, who work for or with it or otherwise come into contact with the charity do not, as a result, come to harm. This policy relates particularly to the management of risk in relation to children and adults at risk.
- 1.1.4 The NRA recognises its duty of care to safeguard and promote the welfare of children (hereafter referred to as 'children' or 'child') and adults at risk with whom the NRA and its Representatives come into contact. This includes helping to protect them from the possibility of abuse and taking appropriate action when the NRA becomes aware of cases of suspected abuse.
- 1.1.5 The NRA acknowledges that some children and adults at risk are more at risk of abuse, particularly those with protected characteristics, for example, those with a disability, or of a particular race, religious belief or ethnic background or those in care. Children and adults at risk who are at risk of feeling or being isolated due to their ability are also considered to be at risk of being more vulnerable. We take reasonable and appropriate steps to safeguard their welfare.
- 1.1.6 The NRA recognises that child abuse and abuse of adults at risk can take place anywhere and that it is everyone's responsibility to report concerns, whether or not abuse may be occurring. We acknowledge that abuse can take place face-to-face and/or online; that it can be non-recent or current; and that perpetrators can be other children or adults, including those in positions of trust.
- 1.1.7 The NRA recognises that health, wellbeing, ability, disability and the need for care and support can affect a person's resilience. It recognises that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

1.1.8 The NRA recognises that there is a legal framework within which charities need to work to safeguard children, adults at risk and its Representatives and will act in accordance with the relevant safeguarding legislation. It is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and requirements, and that children and adults at risk are safe when participating in NRA events and programmes. Everyone within the NRA has a part to play in looking after the children with whom they are working. This is both a moral and legal obligation.

1.1.9 The NRA also supports associated bodies to promote best practice at all levels.

1.2 **Introduction**

1.2.1 This Safeguarding Policy sets out the National Rifle Association's (NRA) approach to preventing and reducing harm to all those who come in contact with the NRA, including children and adults at risk.

1.2.2 The NRA's expectations and procedures in relation to risks to others, e.g. members who are 18 and over but are not an 'adult at risk', its Representatives (including its Trustees), staff and volunteers and others who come into contact with its work are covered by other policies and procedures, as appropriate (see the 'Associated Policies' section below). As part of this approach, this policy and others that relate to the protection from harm will be regularly monitored as part of the governance of the NRA.

1.2.3 As part of our safeguarding policy, the NRA will:

(a) promote and prioritise the safety and wellbeing of children and adults at risk;

(b) ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and adults at risk;

(c) ensure appropriate reporting and action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;

(d) ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;

(e) prevent the employment/deployment of unsuitable individuals by ensuring all necessary DBS checks and safer recruitment practices are adhered to; and

(f) ensure robust safeguarding arrangements and procedures are in operation.

1.2.4 This policy and the procedures contained within are mandatory for everyone involved with the NRA, whether or not they are NRA members. All concerns about a child or an adult at risk must be acted upon in line with our safeguarding reporting procedure. Where concerns

and disclosures of abuse against a child or an adult at risk occur, we prioritise the well-being of children and adults at risk and act in accordance with UK legislation and guidance. Failure to comply with this policy will be taken extremely seriously and viewed as a breach of our safeguarding policies and may ultimately result in dismissal (for representatives) or exclusion (for members/ visitors/ beneficiaries) from the charity.

1.2.5 The NRA understands that safeguarding can be a sensitive and complicated issue and it will provide support to any member, staff or anyone working on its behalf in accordance with the terms of this policy.

1.2.6 The Trustees of the NRA are committed to promoting a fair, open and positive culture to ensure all involved feel able to report concerns, confident that they will be heard and responded to.

1.3 **Application**

1.3.1 This policy stipulates the NRA's organisational and legal position on safeguarding. Failure to adhere to this policy would not only compromise the safety of Representatives and visitors but may ultimately affect the ability of NRA to effectively adhere to its objects.

1.3.2 All staff NRA Representatives are required to adhere to this policy. The NRA expects all Representatives to learn about safeguarding issues in accordance with the relevant statutory and other guidance and within the context of their own roles and responsibilities. To this end, basic safeguarding training will be provided for staff NRA Representatives and, as appropriate, detailed training for the Safeguarding Lead Officer (SLO).

1.3.3 Failure to adhere appropriately to this policy will be treated as a serious matter and may result, in the case of staff, in disciplinary action. If not working under a contract (for example, they are a trustee), a breach of the policy (including falling below the expected standards) may mean that the NRA asks the individual in question to cease being a trustee.

1.3.4 The NRA expects any external organisations it works with, including for example, suppliers and sponsors, to adopt and demonstrate their commitment to the principles and practices set out in this policy and any associated procedures.

1.4 **Definitions**

1.4.1 The following definitions apply in this policy.

1.4.2 'Trustee' means a trustee of the NRA.

1.4.3 'Safeguarding Lead Trustee' means a Trustee nominated by Council from time to time.

1.4.4 'Council' means the Council of the NRA.

- 1.4.5 'Beneficiaries' means all those who engage with or come into contact with the NRA (excluding staff if acting solely in that capacity).
- 1.4.6 'Representatives' means Trustees, NRA staff, members, volunteers, contractors, agency staff, consultants and equivalents.
- 1.4.7 The term 'harm' includes abuse and neglect.
- 1.4.8 The term 'adults at risk' includes 'vulnerable adults'.
- 1.4.9 An 'adult at risk' is defined as any person aged 18 years or over who has needs for care and support, is experiencing (or is at risk of) abuse or neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect. This could be due to, but not limited to, any of the following circumstances:
- (a) age;
 - (b) a learning or other disability;
 - (c) a physical or mental illness, including addiction to alcohol or drugs;
 - (d) receiving any form of health care;
 - (e) living in sheltered accommodation or residential accommodation e.g. a care home;
 - (f) receiving domiciliary care in their own home;
 - (g) being detained in custody or under the supervision of the probation services; or,
 - (h) being otherwise unable to protect himself/herself against abuse or neglect.
- 1.4.10 Whether a person can be described as an adult with safeguarding needs will depend on the extent to which they make and carry out informed choices and how they are able to protect themselves from abuse, neglect and exploitation. Some adults with safeguarding needs may be living in special accommodation and others will be living in the community on their own or with family members.
- 1.4.11 'Safeguarding adults at risk' means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and mitigate both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.
- 1.4.12 The term 'children' means those under 18.
- 1.4.13 'Safeguarding children' means protecting them from abuse and maltreatment, preventing impairment of their health or development, ensuring that they grow up in circumstances

consistent with the provision of safe and effective care and acting to enable all children to have the best outcomes. The welfare of the children is paramount, which means no other considerations should be allowed to override the duty to protect children from harm.

1.4.14 'Child Protection' is part of safeguarding process, protecting individual children identified as suffering or likely to suffer significant harm. This includes the child protection procedures which detail how to respond to concerns about a child.

1.4.15 'Child abuse' means any action by another person, adult or child, that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of care and attention. Neglect, whatever the form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event and it can increasingly happen online.

1.4.16 'Neglect' is the ongoing failure to meet the basic needs of a child or an adult at risk and is the most common form of child abuse. A child or an adult at risk may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or healthcare. A child or an adult at risk may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child or an adult at risk who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage, even death.

Neglect within shooting could include a coach failing to adequately brief participants on range safety procedures.

1.4.17 'Physical abuse' is deliberately hurting a child or adult at risk causing injuries such as bruises, broken bones, burns or cuts. It is not accidental – children or adults at risk who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Sometimes parents or carers will make up or cause the symptoms of illness in their child or adult at risk, perhaps giving them medicine they do not need and making the child unwell, this is known as fabricated or induced illness.

1.4.18 A person is 'sexually abused' when they are forced or persuaded to take part in sexual activities. This does not have to be physical contact and it can happen online. Sometimes the child or the adult at risk will not understand that what is happening to them is abuse. They may not even understand that it is wrong, or they may be afraid to speak out.

1.4.19 Some people have used involvement in sports clubs, events and programmes as a means to 'groom' children or adults at risk. The term 'grooming' refers to the way in which sexual abusers manipulate targeted victims, professional carers, colleagues and their environment to make it easier to abuse children or adults at risk and reduce the likelihood of the child or adult at risk either disclosing or being believed should they share what is happening.

1.4.20 'Emotional abuse' is the ongoing emotional maltreatment of a child or an adult at risk. It is sometimes called psychological abuse and can seriously damage the emotional health and development of a child or adult at risk. Emotional abuse can involve deliberately trying to scare or humiliate a child or adult at risk or isolating or ignoring them. Children and adults at risk who are emotionally abused are often suffering another type of abuse or neglect at the same time although this is not always the case.

1.4.21 Children and adults at risk of all ages can be emotionally abused in a number of ways such as:

(a) Imposing developmentally inappropriate expectations;

(b) Making them feel worthless or inadequate;

(c) Making their position self-image dependent on competitive achievement and success.

1.5 **Monitoring and Review**

1.5.1 The NRA is committed to reviewing its policy and good practice regularly. This policy will be reviewed by Council at least annually, when there is a change in UK law or policy and/or a change in best practice or when a serious incident occurs that highlights a need for change – whichever occurs first.

1.5.2 We will use the records of safeguarding incidents to learn lessons from past incidents/concerns and implement any learning points that arise, whether relating to how the incident was handled or to how to prevent similar incidents occurring in the first place. In some cases, it may be appropriate to commission an independent review of how an incident was managed.

1.5.3 All incidents are recorded in a risk register which is reviewed annually by Council.

2. Safeguarding

2.1 What is Safeguarding?

2.1.1 Safeguarding is making sure someone is safe and can live their life in the way they want to. No person should have to worry about something of harm happening to them, or other taking advantage of them, or other putting them in a position that they are unhappy with, or which causes them distress. Recognising the occurrence or risk of harm is not easy and it is not our responsibility to decide whether harm has occurred. However, it is the responsibility of all of our Representatives to look out for signs of abuse and act if there are any concerns.

2.1.2 When we talk about harm this includes:

(a) Physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint;

(b) Domestic abuse: including psychological, physical, sexual, financial, or emotional abuse. It also covers so-called 'honour' based violence;

(c) Sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material, abuse of a position of trust;

(d) Psychological or emotional abuse: including belittling, name-calling, threats of harm, intimidation, isolation;

(e) Cyber abuse;

(f) Financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits;

(g) Modern day slavery: covering slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment;

(h) Neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs;

(i) Self-neglect: covering a wide range of behaviour that shows that someone is not caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding;

(j) Discriminatory abuse: including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment;

(k) Institutional or organisational abuse: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment;

(l) Extremism and radicalisation;

(m) Forced marriage;

(n) Child trafficking;

(o) Female genital mutilation;

(p) Commercial exploitation;

(q) Bullying or harassment;

(r) Health and safety.

2.1.3 Abuse may be carried out deliberately or unknowingly. Abuse can be a one-off incident or repeated, on-going ill treatment. People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, teachers, advocates, those working with us, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse. It may not always be easy to identify signs of abuse, but the following are some significant signs to be aware of:

(a) Unexplained bruising or injuries;

(b) Sexually explicit language or behaviour, inappropriate to age or development;

(c) Sudden changes in behaviour e.g. becoming withdrawn or aggressive;

(d) Comments or disclosure by a young person or adult at risk;

(e) A noticeable change over a period of time such as weight loss, poor hygiene or unkempt appearance;

(f) Signs of bullying or intimidation.

2.1.4 Children and adults at risk are at particular risk of harm. The NRA's safeguarding commitment therefore focuses on these groups of people.

2.2 **Our Commitments and Responsibilities**

2.2.1 In trying to help deliver these rights, we will take all reasonable steps to:

(a) Develop a zero tolerance 'safety culture' which creates and maintains protective environments;

- (b) Promote and prioritise the safety and wellbeing of children and adults at risk;
- (c) Require Representatives to adhere to this policy, ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters, including how to report concerns where appropriate;
- (d) Place safeguarding at the heart of recruitment practices by carrying out appropriate Disclosure and Barring Service (DBS) or other criminal record checks and obtaining adequate references in accordance with our policy;
- (e) Prevent the employment of individuals who work with children and/or adults at risk where they have been barred by the DBS or are deemed to pose an unacceptable risk to vulnerable groups;
- (f) Where appropriate request updates from appropriate individuals in relation to confirming any changes to the above;
- (g) Set out risks and how we will manage them in risk assessments of our activities and a risk register which is regularly reviewed;
- (h) Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk in line with this policy;
- (i) Report safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice including having first assessed the risk of harm to those involved where such reporting may have unintended consequences;
- (j) Ensure that our complaints and whistleblowing procedures are effective so that those working with us are able to raise concerns in a culture of openness and accountability;
- (k) Ensure on an on-going basis that systems for risk management, due diligence, monitoring and evaluation, audit and review, and other organisational performance mechanisms are fit for purpose and evaluate any and all indicators and processes by which implementation of this safeguarding policy can be measured and these processes will be periodically reviewed to ensure that they remain effective and up-to-date in respect of best practice;
- (l) Take appropriate and proportionate action if this policy is not complied with;
- (m) Ensure that we provide a safe physical environment by applying health and safety measures in accordance with the law and regulatory guidance;
- (n) maintain adequate insurance in relation to our activities and the people involved, to the extent that it is reasonably available;

(o) record and store information professionally and securely, including ensuring that our privacy policy remains suitably updated so that it is clear that we will report wrongdoing on the part of Trustees, Representatives and others to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate references, which appropriately reflect our experience and interaction with them.

2.3 **Children and adults at risk**

2.3.1 Coaches and others working with children and adults at risk have a vital role to play in safeguarding them. NRA events and programmes should provide a safe environment in which children and adults at risk can enjoy shooting and achieve their potential.

2.3.2 It is important to remember that whether someone is vulnerable or at risk is not fixed and can change over time. This means the level of care and support someone requires can also change. For example, a member may join the NRA at a time in their life when they are not vulnerable. However, over the following years the member's circumstances may change meaning they become vulnerable and need extra support.

2.3.3 Therefore, all Representatives of the NRA must keep this in mind, be adaptable and foster a culture where wellbeing is paramount, monitored and help offered where necessary. It is vital that anyone who is involved in the NRA knows who to speak to about their concerns; this may be about themselves or about someone else.

2.3.4 It is not always easy to distinguish poor practice from abuse and it is not your responsibility to determine if abuse has occurred. It is, however your responsibility to identify poor practice and possible abuse and report and act on any concerns you have.

2.3.5 This section will help identify what is meant by good practice and poor practice. Concerns reported in relation to poor practice will be investigated in line with NRA disciplinary procedures.

3. Protecting volunteers and staff

- 3.1 All organisations have a duty to keep their volunteers, and staff safe. For the NRA, this means paying attention to the particular types of harm that can develop within the NRA and affect volunteers and staff (to include contractors, consultants etc.). At the NRA, this could include bullying, the culture of the charity (which may allow poor behaviour and poor accountability), health and safety, and people abusing positions of trust they hold within the charity.
- 3.2 In addition to safeguarding legislation, the general protection of staff members' health, safety and wellbeing is an implied term in contracts of employment. This is further supported by employers having in place policies and avenues of redress for staff. These policies and avenues of redress cover:
- (a) Respect at work
 - (b) Anti-bullying and harassment
 - (c) Flexible working
 - (d) Mental health and wellbeing
 - (e) Using social media, emails and the internet
 - (f) Health and safety
 - (g) Grievances including disciplinary procedures
- 3.3 It is therefore important that volunteers and staff members are protected at every level of the NRA. This protection includes identifying and managing risks, having clear policies in place and ensuring volunteers and staff know how to raise any concerns.

4. Responding to Concerns and Disclosures

4.1 Introduction

- 4.1.1 It is the responsibility of anyone working at an NRA event or programme to act on a concern or disclosure by reporting these to the SLO/ [DSO] or the appropriate authorities.
- 4.1.2 This applies to both suspicions of abuse occurring within NRA events or programmes, and to suspicions that abuse is taking place elsewhere such as in the home of a child or an adult at risk.
- 4.1.3 The NRA will support anyone who, in good faith, reports that a colleague is, or may be abusing a child or an adult at risk, even if it proved to be unfounded.
- 4.1.4 Where concerns are about child abuse, this may be referred to Children's Services, the Local Authority Designated Officer (LADO), the Local Authority Safeguarding Lead or the Police as appropriate. If concerns are about poor practice, the NRA will define the course of action to address this.

4.2 How the Concern is Raised

- 4.2.1 Concerns may be raised in a number of ways:
 - (a) A direct disclosure of abuse to you;
 - (b) A conversation with another adult, child or adult at risk;
 - (c) Direct observation of a concerning incident;
 - (d) Observation of signs or behaviour suggestive of possible abuse;
 - (e) Receipt of an anonymous allegation.

4.3 Responding to Disclosures and Reports of Abuse

- 4.3.1 A disclosure is when a child, an adult at risk or another person tells you that they believe they have been the victim of abuse or someone else has. The following guidance will help in responding to a child, an adult at risk or another person in an appropriate and responsible manner:
 - (a) Do not panic, react calmly so as not to frighten the person disclosing the abuse;
 - (b) Acknowledge what they are doing is difficult, but they are right to confide in you;
 - (c) Reassure them that they are not to blame;
 - (d) Make sure from the outset that you can understand what they are saying;

(e) Do not promise that you will keep the conversation secret. Explain that to help them, you may need to involve other people and you will need to write things down. Information should only be shared on a need-to-know basis.

(f) Listen carefully to them and take them seriously;

(g) Do not allow your shock or distaste to show;

(h) Keep any questions to the minimum required for you to clarify any facts or words you do not understand – do not speculate or make assumptions;

(i) Do not probe for more information than is offered as this may affect any future investigation by statutory agencies;

(j) Do not approach the alleged abuser; and

(k) Report the concern following the steps at section 5.6

4.4 **Recording the Relevant Information**

4.4.1 All concerns and disclosures should be recorded using an 'Incident Report Form' (see Appendix A at the end of this policy).

4.5 **Responding the Referred Safeguarding Concerns**

4.5.1 All reported safeguarding concerns require a response. Referrals should be made to the SLO and/or statutory agencies.

4.5.2 The route an 'inside sport' case should take is as set out below:

(a) Poor practice can be dealt with through internal disciplinary procedures with possible referral to the LADO/ Local Authority Safeguarding Lead.

(b) Possible abuse should be dealt with through referral to the police or Children's Social Care/Social Services with possible referral to the LADO/ Local Authority Safeguarding Lead.

4.5.3 'Outside sport' concerns should be referred to statutory agencies i.e. the police.

4.5.4 **Responding to concerns about possible abuse 'outside' shooting**

Many adults in shooting develop positive relationships with children and adults at risk and are ideally placed to recognise signs or indicators of concerns, or to receive a disclosure of abuse from a child or adult at risk directly.

It is essential that concerns coming to light within shooting, but actually arising elsewhere in the life of the child or adult at risk (e.g. at home, at school or in the wider community) are acted upon in the interest of the child or adult at risk and reported.

This involves reporting concerns to the SLO, or in urgent situations referring directly to local statutory agencies.

4.5.5 Responding to poor practice concerns

Alleged or suspected poor practice by coaches, volunteers or officials always requires a response. Concerns may arise through the NRA's whistleblowing procedures and some level of investigation, risk assessment, conclusion and (if warranted) action is usually needed.

The SLO (potentially with the LADO/ Safeguarding Lead) may decide that a concern constitutes low level poor practice. This may require investigation and/or subsequent management internally. Persistent poor practice, or investigations that reveal more serious concerns should be referred to the SLO for a decision about further appropriate action.

4.5.6 Responding to concerns about serious/persistent poor practice or possible abuse

More serious safeguarding concerns require a robust and immediate initial response, informed and directed by the SLO. This will usually include consultation with or referral to statutory agencies.

In situations where it is alleged or suspected that a child or an adult at risk has been or may be abused or a crime committed, the matter should always be discussed with or referred to Children's Social Care/Social Services and/or the police. The LADO/ Local Authority Safeguarding Lead should be contacted where there are concerns about the behaviour of a member of staff, volunteer or member in a position of trust or responsibility for children or adults at risk.

Where abuse or other criminal behaviour is suspected the SLO should consult with or refer concerns to Children's Social Care/Social Services and/or the Police and/or the LADO before decisions are made to take internal disciplinary action (even on a temporary or interim basis).

There are circumstances where the Police or other statutory agencies may want to initiate enquiries or an investigation before putting the concerns/allegations to the alleged perpetrator.

4.6 Reporting the Relevant Information

4.6.1 All incidents should be reported to the SLO. If the SLO is not contactable, or, if the concern is in relation to the SLO, the NRA Secretary General should be informed without delay.

4.6.2 There is an obligation to report a concern or pass on information if:

- (a) someone is at risk of significant harm, or of harming others; or
 - (b) a crime has been or may have been committed.
- 4.6.3 This does not breach confidentiality, nor does it breach any data protection legislation. If you are in doubt about sharing information, please contact the SLO.
- 4.6.4 It is important we are ready to respond safely to a concern where necessary.
- 4.6.5 **If a child or an adult at risk is in immediate danger you should call the police.**
- 4.6.6 The NRA is committed to reporting all serious incidents to the Charity Commission via a serious incident report. Any serious incident reports to the Charity Commission must be reviewed and approved in accordance with procedures established by Council. Where there is evidence that criminal activity may have taken place, we will report to the relevant police and/or safeguarding authorities as appropriate. Decisions to report to external authorities will be fully risk assessed and anonymisation/pseudonymisation considered when necessary. Reporting will not be avoided on the basis that it may harm our reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.
- 4.6.7 With respect to the Charity Commission the following safeguarding incidents are defined as reportable serious incidents:
 - (a) beneficiaries have been, or are alleged to have been, abused or mistreated resulting in or risking serious harm while under the care of the NRA, or by someone connected with the NRA, for example a Representative or volunteer;
 - (b) there has been an incident where someone who came into contact with the NRA through its work has been abused or mistreated (alleged or actual) resulting in or risking serious harm and this is connected with the activities of the charity; or
 - (c) there has been a breach of procedures or policies at the NRA which has put people who come into contact with it at significant risk of harm, including a failure to carry out checks which would have identified that a person is disqualified under safeguarding legislation from working with children or adults at risk.
- 4.6.8 This list is non-exhaustive and the Charity Commission's up-to-date guidance on reporting serious incidents should be consulted each time a serious incident report is considered.
- 4.6.9 In such cases:
 - (a) The Secretary General will recommend to Council if a serious incident report to the Charity Commission is recommended to be made.
 - (b) The Safeguarding Lead Trustee will liaise with the Chair of Council and subsequently inform the Secretary General of Council's decisions and any subsequent actions.

(c) The progression of incidents reported to the Charity Commission is reported to Council by the Safeguarding Lead Trustee.

4.6.10 The following safeguarding reporting procedure flowcharts provide guidance on reporting concerns for the following situations:

- (a) The behaviour of a staff member or volunteer (e.g. allegations about a coach or officer's behaviour toward a child or an adult at risk)
- (b) The behaviour of another organisation's staff member staff member or volunteer (e.g. allegations reported about an individual working for a partner organisation)
- (c) Concerns about children or adults at risk arising outside of sport (e.g. at home, school or within the community)

4.7 Concerns about the Behaviour of a Staff Member or Volunteer

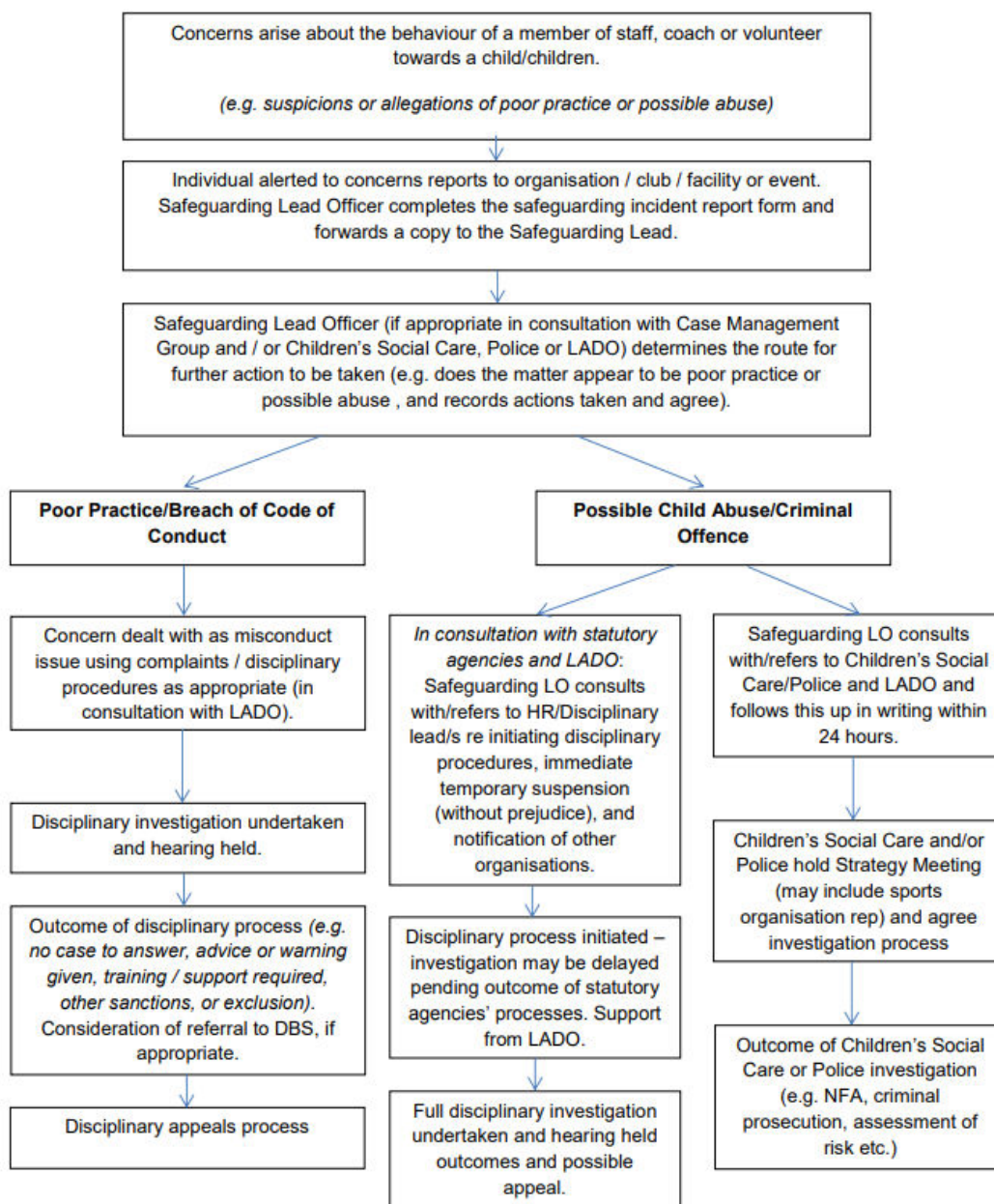
(Where the flowchart refers to child/children it is to be read as also including adults at risk)

CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

1. About the behaviour of the organisation's staff member or volunteer (e.g. allegation about a coach or officer's behaviour towards a child)



4.8 Concerns about the Behaviour of Other Organisation's Staff Member or Volunteer

(Where the flowchart refers to child/children it is to be read as also including adults at risk)

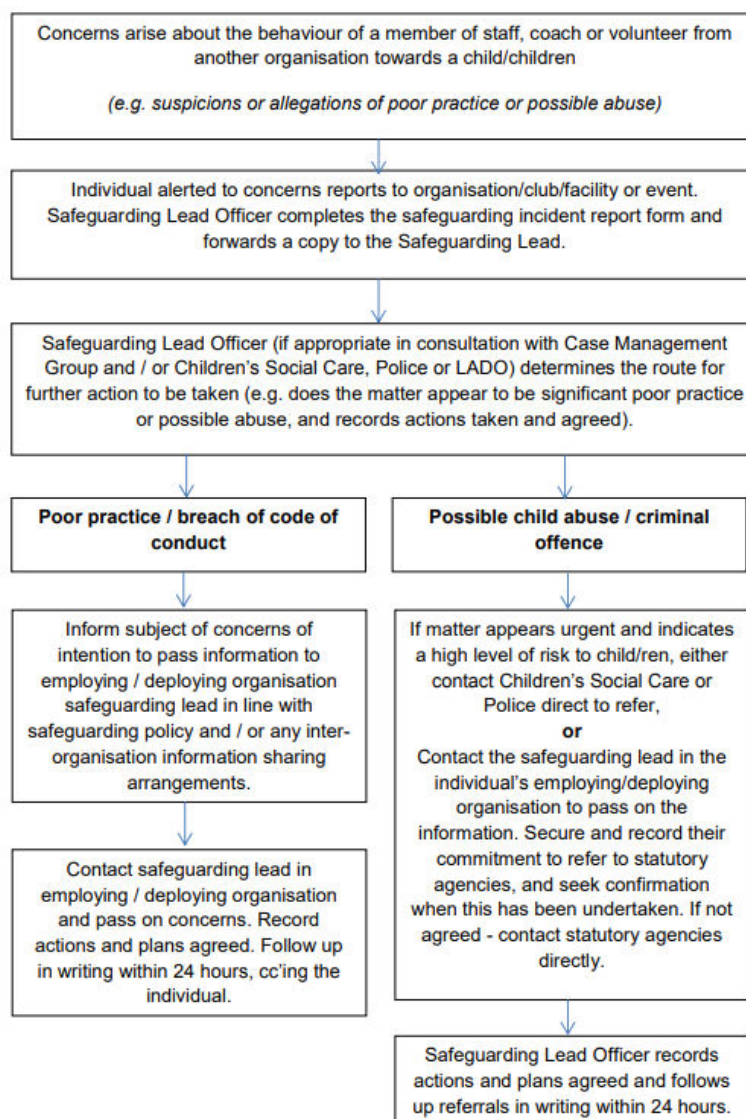
CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

2. About the behaviour of another organisation's staff member or volunteer

(e.g. allegations reported about an individual working for a partner organisation)



4.9 Concerns about Children Arising Outside of Shooting

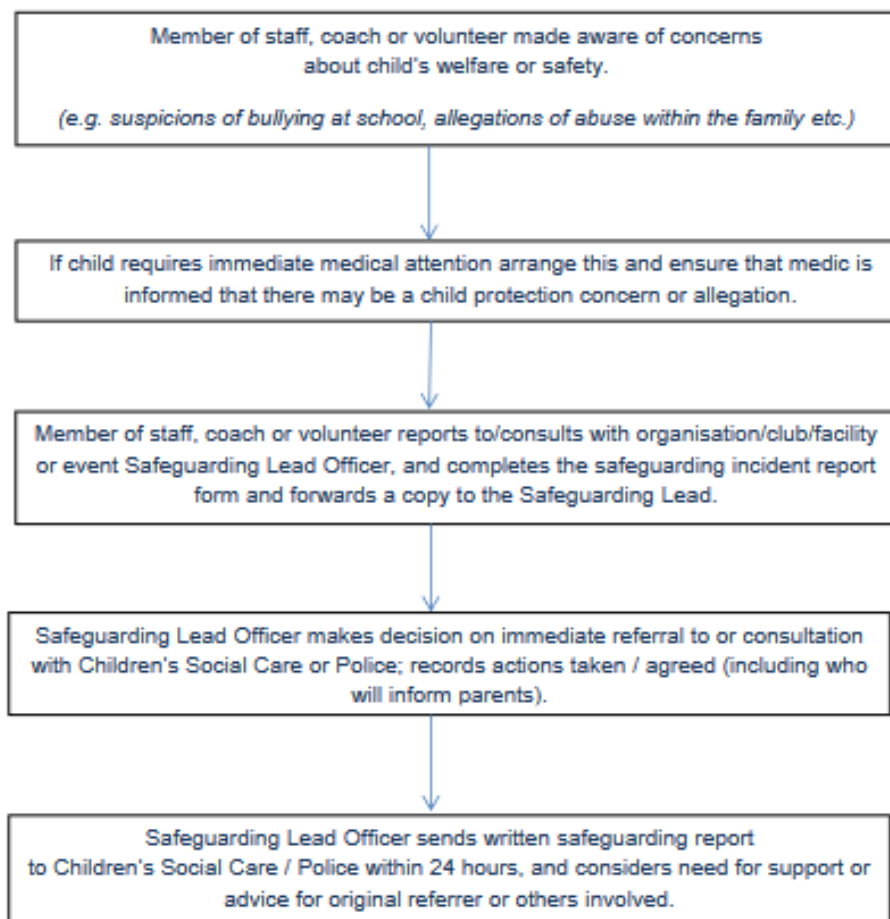
(Where the flowchart refers to child/children it is to be read as also including adults at risk)

CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

3. About children and young people arising outside of sport (e.g. at home, school or in the community)



4.10 **Provision of Support**

4.10.1 Support is available to individuals both during and following an incident/allegation of abuse/complaint.

4.10.2 Individuals will be assigned a point of contact within the NRA separate from the SLO.

4.10.3 The role of the contact will be to:

- (a) Listen to the concerns/queries of the individual or their family;
- (b) Answer questions on the Case Management process;
- (c) Signpost to external organisations where specialist support is needed.

4.10.4 The contact will not discuss any details of the case itself.

4.11 **Information Sharing**

4.11.1 To keep children and adults at risk safe, information needs to be shared appropriately so that decisions can be made to protect them. However, clear boundaries around information sharing are important to maintain confidentiality where appropriate and to ensure that only those who need the information are made aware of it.

4.11.2 **What information to share**

Whenever an organisation receives information that raises concerns about a child, children, or adults at risk decisions need to be made about information sharing. This could include:

- (a) Concerns about a child or an adult at risk received within or outside the sport;
- (b) Concerns about a person in a position of trust, such as a coach – this could include information on a Disclosure & Barring Services (DBS) check;
- (c) Concerns about a member of a shooting club;
- (d) Concerns about a shooting environment, such as an event location or hosting arrangements.

4.11.3 **Key principles for deciding what to share**

CPSU guidance [Information sharing – safeguarding concerns](#) describes the ‘7 Golden Rules’ of information sharing:

1. **Remember that the General Data Protection Regulations (GDPR), Data Protection Act 2018 and human rights law are not barriers** to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. **Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgment, there is good reason to do so, such as where safety may be at risk.
5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure:** ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

4.11.4 **Who to share information with**

Part of the decision-making process will include consideration about who to share information with. This could include:

- (a) Statutory organisations – the police and/or Children’s Services must be informed about child protection concerns; LADOs should be consulted where there are concerns about someone in a position of trust
- (b) DBS – must be informed of any concerns about someone in regulated activity who is suspended or expelled from the organisation.
- (c) Shooting clubs and other sports organisations – informing other organisations needs to be considered according to the principles below in order that they can safeguard children in their care who may be at risk of harm.
- (d) Individuals within the organisation – this will be decided on the basis of who needs to know what information in order to keep children safe according to the principles above.

4.12 **Responding to Non-Recent Historic Abuse**

4.12.1 In relation to non-recent historic abuse, there are a number of ongoing investigations and enquiries across sports. It is important for all staff and volunteers to be aware of what to do if they encounter a disclosure of non-recent historic abuse.

4.12.2 **What is non- recent historic abuse?**

The terms historic abuse and non-recent child abuse are sometimes used interchangeably, however, all such related terms should be dealt with in the same way. These terms are commonly used to refer to disclosures of sexual abuse that were perpetrated in the past. It can also be about a disclosure of neglect, physical, sexual or emotional abuse from someone

who is now 18 year or over, relating to an incident that took place when the alleged victim was under 18 years old. Allegations can be:

- (a) An adult making an allegation of abuse when they were under 18 years of age, that occurred at least one year before it was reported;
- (b) A child making an allegation of abuse that occurred at least one year before it was reported; and
- (c) An individual who reports an allegation, on behalf of another child or adult, that occurred at least one year before it was reported.

Children who have been abused or neglected may experience physical or emotional harm. The effects can be short term but sometimes they last into adulthood. If someone has been abused as a child, it is more than likely that they will suffer abuse again. This is known as re-victimisation.

The following circumstances should be treated as safeguarding incidents and the procedures outlined earlier in this policy should be followed:

- (d) Allegations of child abuse involving people in positions of influence due to being in the public eye or people in a position of trust.
- (e) Allegations of child abuse offences that took place historically where there may have been a failure within an organisation to protect children.
- (f) Allegations of child abuse involving people who are likely to be active where other children or adults at risk may be at risk of harm.

5. Resources and Publication of Safeguarding Policy

5.1 Resources

5.1.1 Related NRA policies:

- (a) NRA Whistleblowing Policy
- (b) NRA Target Marker Policy
- (c) NRA Bullying and Harassment Policy
- (d) NRA Employee Handbook

5.2 Publication of this Policy

5.2.1 The NRA will ensure that this policy is at all times publicly accessible on its website.

Version	Date created	Last review date	Next review date	Document author
V1	03/02/2023		03/02/2024	Nicki Bahia with advice from Bates Wells

6. Useful Contacts

Where a child or young person is at immediate risk of serious harm call 999

National Rifle Association – Safeguarding Lead Officer (SLO)

Georgina Thatcher

safeguarding@nra.org.uk

01483 797 777

National Contacts for Safeguarding

Childline – 24 hour helpline for children

0800 1111

www.childline.org.uk

Child Exploitation and Online Protection Centre

0870 000 3344

Local Authority Designated Officer (LADO)

0300 123 1650

lado@surreycc.gov.uk

NSPCC Child Protection in Sport Unit

0808 800 5000

Kidscape – helpline for adults concerned about bullying

0207 7730 3300

The Samaritans

116 123

Appendix A – NRA Incident Report Form

[Incident reporting form for sports clubs | CPSU \(thecpsu.org.uk\)](https://www.thecpsu.org.uk)

If you have received a concern in relation to safeguarding, please follow the procedures set out in the Safeguarding Policy and submit a report to the Safeguarding Lead Officer ('SLO') using this form. Please email completed forms to safeguarding@nra.org.uk.

Please note that you should keep this matter strictly confidential and not seek to investigate the incident or suspicion, as you may cause further harm. You should not discuss the matter with anyone else and should ensure that all information, including this form, is stored securely and in accordance with data protection law.

NRA Incident Report Form

Your information				
Name				
Address				
Contact number(s)				
Email				
Name of organisation			Your role	

Personal information – child / young person					
Name				Date of birth	
Gender ⁱ	Male <input type="checkbox"/>	Female <input type="checkbox"/>	Non-binary <input type="checkbox"/>	Another description (please state) <input type="checkbox"/>	
Is there any information about the child that would be useful to consider?					

Contact information – parent / carer		
Name(s)		
Address		
Contact number(s)		
Email		
Have they been notified of this incident?	No <input type="checkbox"/>	Please explain why this decision has been taken
	Yes <input type="checkbox"/>	Please give details of what was said / actions agreed

Incident details*			
Date and time of incident			
Please tick one:	<input type="checkbox"/> I am reporting my own concerns.	<input type="checkbox"/> I am responding to concerns raised by someone else – please fill in their details:	
Name of person raising concern		Role within the sport or relationship to the child	
Contact number(s)			
Email			
Details of the incident or concerns (include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay)			

* Attach a separate sheet if more space is required (e.g. multiple witnesses)

Incident details (continued)			
Child's account of the incident			
Please provide any witness accounts of the incident			
Name of witness (and date of birth, if a child)		Role within the sport or relationship to the child	
Address			
Contact number(s)			
Email			
Details of any person involved in this incident or alleged to have caused the incident / injury			
Name (and date of birth, if a child)		Role within the sport or relationship to the child	
Address			
Contact number(s)			
Email			
Please provide details of action taken to date			

Has the incident been reported to any external agencies?	<input type="checkbox"/> No	<input type="checkbox"/> Yes – please provide further details:
Name of organisation / agency		
Contact person		
Contact number(s)		
Email		
Agreed action or advice given		

Declaration	
Your signature	
Print name	
Today's date	

Contact your organisation's Designated Safeguarding Officer in line with the NRA's reporting procedures	
Safeguarding Officer's name	
Date reported	

Appendix B - Promoting Good Practice

Child abuse and harassment can take place in many situations, from the home and school, to a shooting environment. Coaches, officials, staff, volunteers and members should adopt the highest standards of practice and be responsible for identifying those in need of protection.

Anyone working with children and adults at risk for the NRA is in a position of trust. If a child or an adult at risk decides to talk to you about abuse, or you have concerns about them, you need to know what to do. You also need to understand your duty of care towards children and adults at risk in shooting, the current guidance on good practice and the need to act responsibly. This will not only protect the children and adults at risk you are responsible for but reduce the potential for misunderstandings and inappropriate allegations being made.

ALWAYS:

- Work in an open environment (i.e. avoid private or unobserved situations) and encourage an open environment between others.
- Treat all children and adults at risk equally and respect their dignity.
- Always put the welfare of each child or adult at risk first, ahead of winning or achieving goals.
- Maintain a safe, appropriate distance in your dealings with children and adults at risk (it is not appropriate to have an intimate relationship with a child or adult at risk, or to share a room with them).
- Build balanced relationships based on mutual trust which empowers children and adults at risk to share in the decision-making process.
- Make shooting fun and enjoyable, and promote fair play.
- Ensure that if any form of manual/physical contact is required, it is done openly and according to good coaching practice¹. Care is needed when adjusting hand and body positions, as well as assisting with shooting equipment. Children and adults at risk should always be consulted, and their agreement obtained. If necessary, parents should be told what needs to be done and why and their agreement obtained.
- Coaches should give information to parents, children, carers and adults at risk about their coaching methods and style. They should explain why any form of manual/physical contact by the coach is required.
- Keep technical skills, qualifications and insurance up to date.
- Involve parents and carers wherever possible; e.g. parents to supervise their children in changing rooms.
- Ensure that if mixed teams are taken away, they are always accompanied by a male and female member of staff (Note however that same-sex abuse can also occur).
- Ensure that at events where shooters stay away from home, adults do not enter children's rooms or invite children or adults at risk into their rooms (formal room checks must always be done with two or more members of staff).
- Be an excellent role model – this includes not smoking or drinking alcohol in the company of children or adults at risk.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Avoid excessive training or competition. Recognise everyone's needs and capabilities; avoid pushing shooters against their will

¹ <https://www.ukcoaching.org/resources/topics/guides/code-of-practice-for-sports-coaches>

- Secure parental consent in writing to acting in loco parentis (in place of a parent) if it may be necessary to give permission for emergency first aid and/or medical treatment.
- Be aware of any medicines being taken by participants, and any existing injuries.
- Keep a written record of any injury that occurs, with the details of any treatment given.
- Obtain written parental/ welfare deputy consent if officials/coaches are required to transport children or adults at risk in their cars.
- Ensure all transport arrangements are agreed with a parent/carer.
- Remember, although any physical contact requires a level of agreement, **safety must never be compromised.**

Poor Practice

As well as adopting and promoting good practice, it is important to recognise and respond to poor practice. This could include:

- Encouraging or initiating bullying behaviour;
- Failing to respond to allegations made by a child or adult at risk;
- Children and adults at risk using inappropriate language without being challenged;
- Misuse of electronic communication and social media;
- Children and adults at risk being reduced to tears as a form of control;
- Favouritism of one child or adult at risk;
- Humiliation of a child or adult at risk in front of their peers.

Guidance on Physical Contact

Physical contact between adults and children and adults at risk in shooting should take place only when necessary to:

- Develop shooting skills or techniques;
- Treat an injury;
- Prevent an injury or accident from occurring;
- Meet the requirements of shooting;
- Comfort a distressed child or adult at risk.

Parents and carers need to feel confident that contact between those running shooting activities, children and adults at risk are safe and appropriate. Adults in shooting need confidence that their actions cannot be misconstrued. Children and adults at risk have a right to say what level of contact they are comfortable with.

The following provides guidelines for how physical contact between adults, children and adults at risk in shooting can take place appropriately and safely.

- Physical contact should take place in the interests of and for the benefit of the child or adult at risk, rather than the adult involved.
- Adults should explain the nature of and reason for the physical contact to the child or adult at risk (e.g. for example to aid the demonstration of a specific shooting technique).
- Unless the situation is an emergency, the adult should ask the child or adult at risk for permission before the physical contact.
- Coaches should provide an induction for new members and their parents/carers that covers guidance about any physical contact that will be required as part of that activity.

- Children and adults at risk should be encouraged to voice concerns they have if any physical contact makes them feel uncomfortable or threatened.
- Contact should not involve touching genital areas, buttocks, breasts or any other part of the body that might cause distress or embarrassment to the child or adult at risk.
- Physical contact should always take place in an open or public environment and not take place in secret or out of sight of others.
- Well intentioned gestures such as putting a hand on the shoulder or arm, can, if repeated regularly, lead to the possibility of questions being raised by observers. As a general principle, adults in positions of responsibility should not make gratuitous or necessary physical contact with children.

Specific Assistance due to Disability or Injury

In the case of a child or adult at risk with a disability, specific support or assistance may be required. The following guidelines should be followed:

- Parents/carers or their delegated care providers should be asked to undertake all intimate or personal care tasks for their child or adult at risk. This is not an appropriate role for coaches and others involved in leading activities.
- When children or adults at risk with disabilities are lifted or manually supported, they should be treated with dignity and respect.
- Relevant health and safety guidelines must be followed to ensure the safety of the child, adult at risk and those assisting.
- Do not take on responsibility for tasks for which you are not appropriately trained.

Appendix C – Other Important Guidance

C1: Trips away with children

An identified Lead Responsible Adult will have a 'duty of care' as well as a legal responsibility under the Children Act for the safety and well-being of the athletes at all times. The Lead Responsible Adult will be responsible for ensuring the safeguarding policy and procedures are being followed. The Lead Responsible Adult may be the Team Manager, Coach or another person but must be agreed prior to the trip.

All staff working with children will have been vetted and should ensure they fully understand and adhere to this policy. Current advice regarding physical contact with children should be followed.

General Guidance

Boys and girls should be in separate sleeping quarters, and children must not share rooms with adult staff members or adult athletes.

Where there is only one under-18 athlete it is accepted it may be preferable for them to share with an athlete over the age of 18 of the same sex rather than be in a room by themselves. However, members of the opposite sex must not enter their room. Where under-18s are sharing with over-18s, parents must be informed of the proposed situation and permission sought along with permission of the athlete.

Staff should not enter the sleeping quarters of under-18s without another staff member present (unless it is an emergency).

At least once staff member should be with the children at all times of the day, or at least within very easy reach. The children must at all times know the whereabouts of at least one of the staff members in case of emergency.

Lead Responsible Adult Checklist

- If athletes have mobile phones, it is advisable for staff to have their numbers in case of emergency. These details should only be used where necessary and appropriate.
- Copies of all emergency contact details and athletes telephone numbers should be given to any other managers, coaches or staff with responsibilities for welfare when abroad, in case of emergency.
- Athletes should be given mobile telephone numbers of all staff with responsibilities for welfare, to be used in emergency only. This is particularly important if athletes are travelling independently from the group.
- Staff and athletes should delete the contact details after the trip.

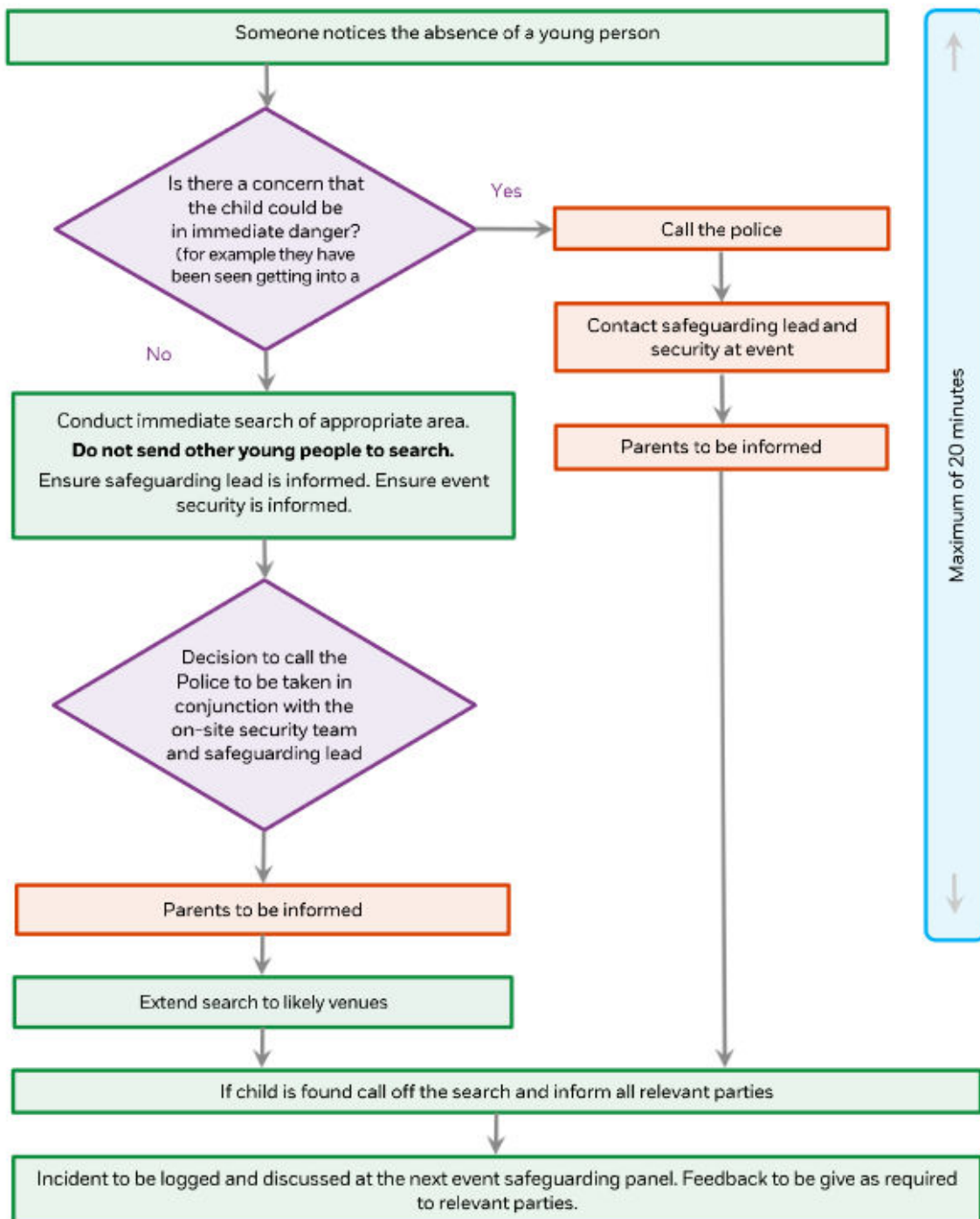
C2: Guidance on missing children

If a child goes missing during an event, the NRA will apply the following procedure:

- Ensure that all other children continue to be supervised appropriately while a search for the child concerned is carried out.
- Organise the remaining available responsible adults to conduct a search of the surrounding area allocating each individual to a specific area; request all those searching report back within a short time, depending on the size of the area being searched.
- If the child cannot be found after a good search of the immediate surroundings, contact the child's parents to advise them of the concern and reassure them that everything is being done to locate the child.
- Make a note of the circumstances in which the child has gone missing and where he/she was last seen and prepare a detailed physical description of the child, to include their hair and eye colour, approximate height and build and clothing he/she was wearing.
- Report the concern to the police if the search is unsuccessful and no later than 20 minutes after the initial missing person report if the search is ongoing.
- Follow police guidance if further action is recommended and maintain close contact with the police.
- Report the incident to the SLO.
- Ensure that you inform all adults involved including the parents, searchers and police if at any stage the child is located.

If an athlete or young volunteer appears to be missing, the flow chart below identifies the process to be followed. There may well be access to photographs of all children at the event and if so, these can be used to help provide the police with a description should this be necessary.

Flowchart – procedure for missing child or young person



C3: Guidance on the use of photography and recording equipment

The NRA may promote its events and programmes to encourage participation and celebrate success, this may include the use of photographs and film of the events and programmes in action. Coaches may find it helpful to use photographs and film as a tool to support an athlete's skill development. Family and friends of participants may also wish to take photos or film at British Shooting events and programmes.

The key concerns with regards to the use of images of children and adults at risk are:

Children and adults at risk may be identified, contacted or groomed

Including the personal information of a child or adult at risk alongside their image can make them identifiable and therefore vulnerable to individuals looking to locate, contact or 'groom' children or adults at risk for abuse.

Even if personal details are kept confidential, other details identifying the sports organisation, school or club, or their favourite sportsperson or team, can also be used to groom the child or the adult at risk.

There is an increased risk of identification of, and contact with, a child or adult at risk:

- By someone in circumstances where there are legal restrictions – such as if the child or adult at risk is in local authority care or placed with an adoptive family; or,
- Where it is potentially dangerous to reveal the whereabouts of the child or the adult at risk to an estranged parent due to previous concerns about domestic violence.

Someone might make inappropriate or illegal images of children and adults at risk

Photo or film content may itself be inappropriate, or images may be used inappropriately or out of context. Some individuals deliberately target sports activities and set out to take inappropriate photos in ways that are potentially illegal and harmful, such as:

- Images of children changing
- Photos taken in the toilets
- Using a camera at ground level to photograph up girls' skirts
- Images that appear ambiguous can be used inappropriately and out of context by others
- Images can easily be copied and edited, perhaps to create child-abuse images
- Images shared privately online can be re-shared, possibly entering the public domain on websites or social media

Guidelines for photographic and recorded images

Athlete registration forms should make provision for parents/carers/athletes to opt-out of the capture and organisation's use of photographs and film. Where consent has not been provided, photographs and film should not be used.

All athletes featured must be appropriately dressed for the activity in which they are participating.

Personal details that could make the athlete vulnerable, such as their name, exact address or school should never be revealed. Where the name of a child or adult at risk is referenced, it is usual practice not to include their picture. However, for elite athletes, it is reasonable to expect their name to be included alongside their image. The exception to this is where consent has been denied.

Coaches should be allowed to use filming equipment, with consent, as a legitimate coaching aid, however care should be taken in the dissemination and storage of film in line with the Data Protection Act 2018.

Photographs and/or film of a child or adult at risk known to be the subject of a court order should not be used.

Parents and other spectators should only take photographs and film of their own child and steps should be taken to communicate this.

C4: Butt Supervisors

The NRA recognises the contribution of butt supervisors and target markers to shooting and further recognises the importance of maintaining a committed and competent workforce supported by effective training and development.

Both target markers and butt supervisors must complete the required training which, among other things, covers safety, target marking and emergencies.

Butt supervisors and target markers are set up in close proximity in the range butts for the duration of shooting and are required to physically lower and raise mechanical frames between shooting in order to score the shot.

Target markers employed by the NRA are often under 18 and can be as young as 15 years old. Supervisors are invariably adults over the age of 18. Consequently, the position of all prospective NRA butt supervisors will be subject to a clear DBS check.

Please see the NRA Target Marker Policy for further information.
