



# **NATIONAL RIFLE ASSOCIATION**

## **SAFEGUARDING POLICY**

**Adopted by Council on 5 June 2026**

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# **1. NRA Safeguarding and Welfare**

## **1.1 Policy Statement**

- 1.1.1 The National Rifle Association (NRA) recognises that the welfare and interests of children and adults at risk are paramount in all circumstances, in accordance with the Children Act 1989/2004, the Care Act 2014 and *Working Together to Safeguard Children (2023)*. It aims to ensure that regardless of any protected characteristic under the Equality Act 2010, all children have a positive and enjoyable experience of shooting in a safe, child-centred, and both physically and digitally safe environment.
- 1.1.2 The NRA is committed to creating and maintaining a safe, positive and transparent organisational culture, where concerns, including low-level concerns, can be raised without fear of reprisal and where staff, volunteers and members feel confident to speak up.
- 1.1.3 The NRA recognises and acknowledges its legal duty, as required by the Charity Commission's Safeguarding and Protecting People guidance (2024), to proactively safeguard and promote the welfare of 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 ensure that all reasonable steps are taken to prevent avoidable harm arising from its activities, environments and relationships and to ensure that individuals do not come to harm as a result of their involvement with the charity. This policy relates specifically to the management of safeguarding risks affecting children and adults at risk, including risks arising in person, online, and through digital communication.
- 1.1.4 The NRA recognises its duty of care to safeguard and promote the welfare of children and adults at risk, including protecting them from abuse, neglect, exploitation, domestic abuse (as defined by the Domestic Abuse Act 2021), and online harm.
- 1.1.5 The NRA acknowledges that some children and adults at risk face increased vulnerability – for example, looked-after children, those with disabilities, those experiencing discrimination or isolation, and those with multiple or intersecting vulnerabilities. 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 occur in any setting 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 can include peer-on-peer abuse and 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 will comply with all relevant safeguarding legislation, including the Children Act 1989/2004, Care Act 2014, Domestic Abuse Act 2021, Online Safety Act 2023, Working Together to Safeguard Children 2023, Data Protection Act 2018/UK GDPR, and Charity Commission safeguarding guidance. The NRA is committed to ensuring its safeguarding practice reflects statutory responsibilities and best practice, and that safeguarding concerns are reported to the appropriate authorities without delay.

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 NRA's approach to preventing and reducing harm to all those who come in contact with the NRA, including children and adults at risk, and outlines the organisational duties placed upon the NRA under safeguarding legislation and Charity Commission requirements,

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 physical, emotional and digital 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 that safeguarding concerns are reported without delay to the appropriate agencies, that appropriate action is taken, and that support is provided to anyone raising or affected by a concern including protection for whistleblowers;

(d) ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained securely in line with the Data Protection Act 2018/UK GDPR, with appropriate retention periods applied;

(e) prevent the employment or deployment of unsuitable individuals through robust safer recruitment processes, including identity checks, references and appropriate DBS checks (including barred-list checks where required); 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 immediately and 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 treated as a serious breach of safeguarding responsibilities and may result in disciplinary action, dismissal, termination of contract, or removal from role.
- 1.2.5 The NRA understands that safeguarding can be sensitive and complex and is committed to using a trauma-informed, supportive and proportionate approach when assisting anyone who raises a concern.
- 1.2.6 The Trustees of the NRA are responsible for ensuring effective safeguarding arrangements, promoting a fair, open and accountable culture, and ensuring that safeguarding is integral to the governance and oversight of the charity.
- 1.3 **Application**
- 1.3.1 This policy sets out the NRA's organisational and legal responsibilities for safeguarding. It applies to all NRA activities, including in-person events, digital platforms, social media, communications, and third-party venues. Failure to adhere to this policy compromises the safety of beneficiaries, Representatives and visitors, and may ultimately affect the NRA's ability to meet its charitable 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 to this policy will be treated as a serious matter and may result in disciplinary action, dismissal, removal from role, or termination of volunteer or contractor agreements. For Trustees, any breach of this policy, including failing below expected safeguarding standards, may result in their removal from office in line with Charity Commission guidance on Trustee conduct.
- 1.3.4 The NRA requires all external organisations it works with, including affiliated clubs, suppliers, contractors, and sponsors – to adopt safeguarding standards that meet or exceed the principles and procedures set out in this policy.

## 1.4 Definitions

- 1.4.1 These definitions follow the Children Act 1989/2004, Care Act 2014, Working Together to Safeguard Children (2023), Domestic Abuse Act 2021, Online Safety Act 2023, the Data Protection Act 2018/UK GDPR, and Charity Commission Safeguarding Guidance (2024).
- 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). This includes individuals who interact with the NRA through digital or online platforms.
- 1.4.6 'Representatives' means Trustees, NRA staff, members, volunteers, coaches, instructors, contractors, agency staff, consultants and other individuals acting on behalf of the NRA.
- 1.4.7 The term 'harm' includes abuse, neglect, exploitation, domestic abuse, online harm, grooming, and any behaviour that causes physical, emotional or psychological injury,
- 1.4.8 The term 'adults at risk' includes 'vulnerable adults'.
- 1.4.9 An 'adult at risk' is defined under the Care Act 2014 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.

An adult's vulnerability may fluctuate over time. Adults experiencing coercive control, domestic abuse, mental ill health, or social isolation may also meet the threshold for adult safeguarding.

- 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. Safeguarding adults must also follow the Mental Capacity Act 2005 and include consideration of fluctuating capacity and the adult's wishes and autonomy.
- 1.4.12 The term 'children' means those under 18. This includes unborn babies where safeguarding concerns exist in relation to pregnancy (Working Together 2023).
- 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. Safeguarding children also includes protecting them from online abuse, grooming, exploitation, and harmful digital content.
- 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. Child protection procedures also include responses to peer-on-peer abuse, sexual violence or harassment, and abuse via online platforms.
- 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. Other forms of abuse include Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) including county lines, peer-on-peer abuse, online grooming and image-based abuse, exposure to domestic abuse (Domestic Abuse Act 2021) and non-recent (historic) abuse.

- 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.

Neglect also includes digital neglect, where a child is inadequately supervised online or exposed to harmful online environments.

- 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. Physical abuse may also occur via forced or coerced participation in unsafe online challenges or harmful digital activities.
- 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. Sexual abuse includes online grooming, inducement to share sexual images, sexualised messaging, and image-based sexual abuse.
- 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. Emotional abuse includes exposing a child to domestic abuse, coercive control, or sustained criticism or humiliation.
- 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.

- 1.4.22 A 'position of trust' refers to roles defined under the Sexual Offences Act 2003 (as amended by the Police, Crime, Sentencing and Courts Act 2022), including sports coaches and instructors. Sexual activity between an adult in a position of trust and a 16-17-year-old they supervise is a criminal offence.
- 1.4.23 'Peer-on-peer' abuse means any form of physical, sexual, emotional, or online abuse perpetrated by children or young people towards other children or young people.
- 1.4.24 A 'low-level concern' is any concern, no matter how small, about an adult's conduct towards a child that does not meet the threshold for a safeguarding referral but may indicate a pattern of concerning behaviour.
- 1.4.25 'Online harm' includes grooming, coercion, exploitation, exposure to harmful content, cyberbullying, or inappropriate digital communication.
- 1.4.26 A 'serious incident' is an adverse event, whether actual or alleged, which results in or risks significant harm to beneficiaries or others who come into contact with the charity through its work, and must be reported to the Charity Commission.

## **1.5 Monitoring and Review**

- 1.5.1 The NRA will review this policy annually, or sooner if there is a change in legislation or statutory guidance, a significant safeguarding incident, or at the request of the Safeguarding Lead Trustee.
- 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 means protecting children and adults at risk from abuse, neglect, exploitation, domestic abuse, grooming and online harm, and promoting their health, wellbeing, and human rights. Everyone has the right to live free from abuse, harm or coercion. Recognising the signs or risks of harm can be difficult, and it is not the responsibility of Representatives to determine whether abuse occurred; however, all Representatives have a duty to be alert to concerns and to act immediately in accordance with this policy.

2.1.2 Harm may occur in person or online and includes, but is not limited to, the following forms:

(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. Under the Domestic Abuse Act 2021, children who see, hear or experience domestic abuse are victims in their own right

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

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

(e) Cyber abuse: including online grooming, cyberbullying, coercion, harassment, manipulation, or exposure to harmful digital content;

(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, homophobic, transphobic or disability-related harassment, slurs or similar treatment based on protected characteristics;

- (k) Institutional or organisational abuse: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment;
- (l) Extremism and radicalisation: including engagement with extremist ideologies or behaviours, as defined by the Prevent Duty;
- (m) Forced marriage;
- (n) Child trafficking;
- (o) Female genital mutilation;
- (p) Commercial exploitation;
- (q) Bullying or harassment: including face-to-face or online behaviour that intimidates, humiliates or abuses;
- (r) Health and safety: including unsafe environmental conditions or practices that place people at risk of avoidable harm.
- (s) Child sexual exploitation (CSE);
- (t) Child Criminal Exploitation (CCE): including county lines;
- (u) Peer-on-peer abuse;
- (v) Online harm, image-based abuse and coercion;
- (w) Non-recent (historic) abuse.

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, including online abuse, but the following are some significant indicators 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;
- (g) Sudden withdrawal from online activity or distress linked to digital platforms;
- (h) unusual secrecy around online communications;
- (i) possession of unexplained money, gifts or items (may indicate grooming or CCE);
- (j) a young person being overly familiar with adults or older youths online or in person.

2.1.4 Children and adults at risk are at particular risk of harm and may experience periods of increased or fluctuating vulnerability. The NRA's safeguarding commitment therefore focuses on these groups, including protecting them from abuse by individuals in positions of trust.

## 2.2 **Our Commitments and Responsibilities**

2.2.1 In order to uphold these rights, the NRA will take all reasonable and proportionate steps to:

- (a) Develop a zero tolerance safeguarding culture which creates and maintains physically, emotionally, psychologically and digitally safe environments;
- (b) Promote and prioritise the safety, wellbeing and rights of children and adults at risk, including their online safety;
- (c) Require Representatives to adhere to this policy, ensure that everyone understands their safeguarding roles and responsibilities, and provide mandatory safeguarding e-learning (at least every two years) including how to report concerns immediately;
- (d) Place safeguarding at the heart of recruitment practices by applying robust safer recruitment measures, including identity checks, references, enhanced DBS checks and barred-list checks (where required);
- (e) Prevent the employment or deployment of any individual (including contractors and volunteers) who is barred from working with children or adults at risk or who is assessed as posing an unacceptable risk;
- (f) Where appropriate request updates from appropriate individuals in relation to confirming any changes to the above;
- (g) Identify and manage safeguarding risks within risk assessments for all activities, including shooting-specific risks (e.g. range supervision, butt supervision, lone working) and digital/online risks;
- (h) Ensure that appropriate and immediate action is taken in the event of any allegations or suspicions of harm to children or adults at risk in line with this policy;

- (i) Report safeguarding incidents, allegations or concerns to external authorities, including the Local Authority Designated Officer (LADO) and, where required, the Charity Commission's Serious Incident Reporting process, having assessed any immediate risks to those involved;
- (j) Ensure that our complaints and whistleblowing procedures are effective and provide protection from detriment for anyone raising concerns in a culture of openness and accountability;
- (k) Ensure systems for safeguarding risk management, due diligence, monitoring, evaluation, audit and review are effective, regularly monitored, and updated to reflect current legislation and best practice;
- (l) Take appropriate and proportionate action where this policy is not complied with, including disciplinary action, removal from role or termination of engagement;
- (m) Ensure a safe physical and digital environment by applying appropriate health, safety and online safety measures in accordance with 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 safeguarding information professionally and securely in line with the Data Protection Act 2018/UK GDPR, ensuring clarify in our privacy policy reporting concerns to authorities and applying appropriate retention periods (including long-term retention of child protection records).

## 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, programmes and online platforms must provide a physically, emotionally, psychological and digitally safe environment in which children and adults at risk can enjoy shooting and achieve their potential.
- 2.3.2 It is important to recognise that vulnerability is not fixed and can change over time. Life events such as disability, mental ill health, coercive control, domestic abuse, bereavement or fluctuating capacity may increase a person's vulnerability and change the level of support they require.
- 2.3.3 Therefore, all Representatives of the NRA must be alert to changing vulnerabilities, be adaptable, foster a culture where wellbeing is prioritised, and ensure that everyone knows how to raise concerns. Representatives must also report low-level concerns or patterns of behaviour that may indicate emerging risk.
- 2.3.4 It is not always easy to distinguish poor practice from abuse and it is not the responsibility of Representatives to determine whether abuse has occurred. It is, however, their

responsibility to identify poor practice, possible abuse and concerning behaviour, and to report such concerns immediately, including referral to the LADO where the concern relates to a person in a position of trust.

- 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 includes recognising and managing the types of harm that can arise within organisations, including bullying, harassment, discrimination, unhealthy or unsafe culture, poor accountability, unsafe health and safety practices, online or digital harm, and abuse of a position of trust. The NRA is committed to maintaining a safe, inclusive and transparent culture in which all Representatives are supported, protected from harm, and able to raise concerns (including low-level concerns) without fear of reprisal.
- 3.2 In addition to safeguarding legislation, employers have legal duties under the Health and Safety at Work Act 1974, the Equality Act 2010 and employment law to protect the health, safety and wellbeing of staff. This includes having clear policies, procedures and support mechanisms in place. These typically cover:
- (a) Respect at work and promoting positive workplace culture;
  - (b) Anti-bullying and harassment;
  - (c) Flexible working and reasonable adjustments;
  - (d) Mental health, wellbeing support and access to supervision;
  - (e) Safe use of social media, emails, messaging and online communication
  - (f) Health and safety arrangements;
  - (g) Grievances, disciplinary procedures and whistleblowing;
  - (h) Reporting low-level concerns and inappropriate conduct, including concerns about individuals in positions of trust.
- 3.3 It is essential that volunteers and staff members are protected at every level of the NRA. This includes identifying and managing organisational, cultural, operational and digital risks; ensuring clear and accessible policies are in place; making sure all Representatives know how to raise concerns, including anonymously if needed. Managers and Trustees have particular responsibility for promoting a safe culture and responding promptly and appropriately to any concerns raised.

## **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 immediately on a concern, low-level concern or disclosure by reporting these to the SLO or the appropriate statutory authorities.
- 4.1.2 This applies to suspicions or disclosures of abuse occurring within NRA events or programmes, online, or within any setting, including concerns about abuse elsewhere such as in the home, school, community or involving a person in a position of trust.
- 4.1.3 The NRA will support and protect anyone who, in good faith, reports a concern or disclosure, including those relating to colleagues or persons in positions of trust, even if the concern is later found to be unfounded.
- 4.1.4 Where concerns relate to a child, they may be referred to Children's Services, the Local Authority Designated Officer (LADO), the Local Authority Safeguarding Lead or the Police as appropriate. Concerns about adults at risk must be referred to Adult Social Care and/or the Police. Concerns that amount to poor practice will be managed internally and escalated where necessary.

### **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
  - (f) Concerns shared via online communication, social media or digital platforms;
  - (g) Low-level concerns raised about a Representative's behaviour.

### **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 that speaking up may feel difficult and that they have done the right thing by telling 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 confidentiality. Explain that you may need to share information with those who can help, but only on a strictly 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 questions to an absolute minimum and only ask open questions for clarification (e.g. 'Tell me what happened'). Do not make assumptions or suggest answers.
- (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 immediately, following the steps at section 5.6.

#### **4.4 Recording the Relevant Information**

- 4.4.1 All concerns, disclosures and low-level concerns must be recorded using the NRA Safeguarding Concern Form - [NRA Safeguarding Concern Form – Fill in form](#) (see Appendix A at the end of this policy). Records must be factual, contemporaneous and compliant with data protection legislation.

#### **4.5 Responding to the Referred Safeguarding Concerns**

- 4.5.1 All reported safeguarding concerns require timely assessment and response, including an initial risk assessment.
- 4.5.2 The route an 'inside sport' case should take is as set out below:
  - (a) Poor practice or low-level concerns will be managed through internal disciplinary procedures and, where appropriate, may be referred to the LADO/ Local Authority Safeguarding Lead.
  - (b) Possible abuse should be referred to the police or Children's Social Care/Social Services for children, or Adult Social Care for adults at risk.

4.5.3 'Outside sport' concerns must be reported to the SLO and referred to statutory agencies.

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.

Concerns involving online abuse or immediate risk must be referred to the Police without delay.

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.

Repeated low-level concerns must be monitored, reviewed and escalated at the earliest appropriate opportunity to the SLO, who will determine whether further safeguarding action or referral is required.

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

Serious or persistent concerns, or those indicating possible abuse require an immediate and robust response directed by the SLO. In all cases where it is alleged or suspected that a child or adult at risk has been abused or a crime may have been committed, the matter must be referred to Children's Social Care/Social Services and/or the Police without delay.

The LADO/Local Authority Safeguarding Lead must be contacted where concerns relate to the behaviour of a member of staff, volunteer or anyone in a position of trust.

No Internal disciplinary action (including temporary suspension) should be taken before consultation with statutory agencies unless required urgently to prevent further risk.

Statutory agencies may request that no contact is made with the alleged perpetrator until they have completed initial enquiries.

#### 4.6 **Reporting the Relevant Information**

4.6.1 All incidents should be reported to the SLO. If the concern relates to the SLO, or if the SLO is unavailable, the Secretary General must be notified immediately. Anonymous reporting is permitted.

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

(a) someone is at risk of significant harm, immediate harm, or of harming others; or

(b) a crime has been or may have been committed.

4.6.3 Sharing information for safeguarding purposes is lawful under the Data Protection Act 2018 where necessary to protect a child or adult at risk.

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 Serious incidents will be reported to the Charity Commission in accordance with its 2024 guidance. 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 appropriate safer-recruitment checks (including DBS and barred-list checks) which would have identified that a person was unsuitable or disqualified 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 oversee the process and ensure appropriate governance and follow-up actions.
- (c) The progression of incidents reported to the Charity Commission is reported to Council by the Safeguarding Lead Trustee.

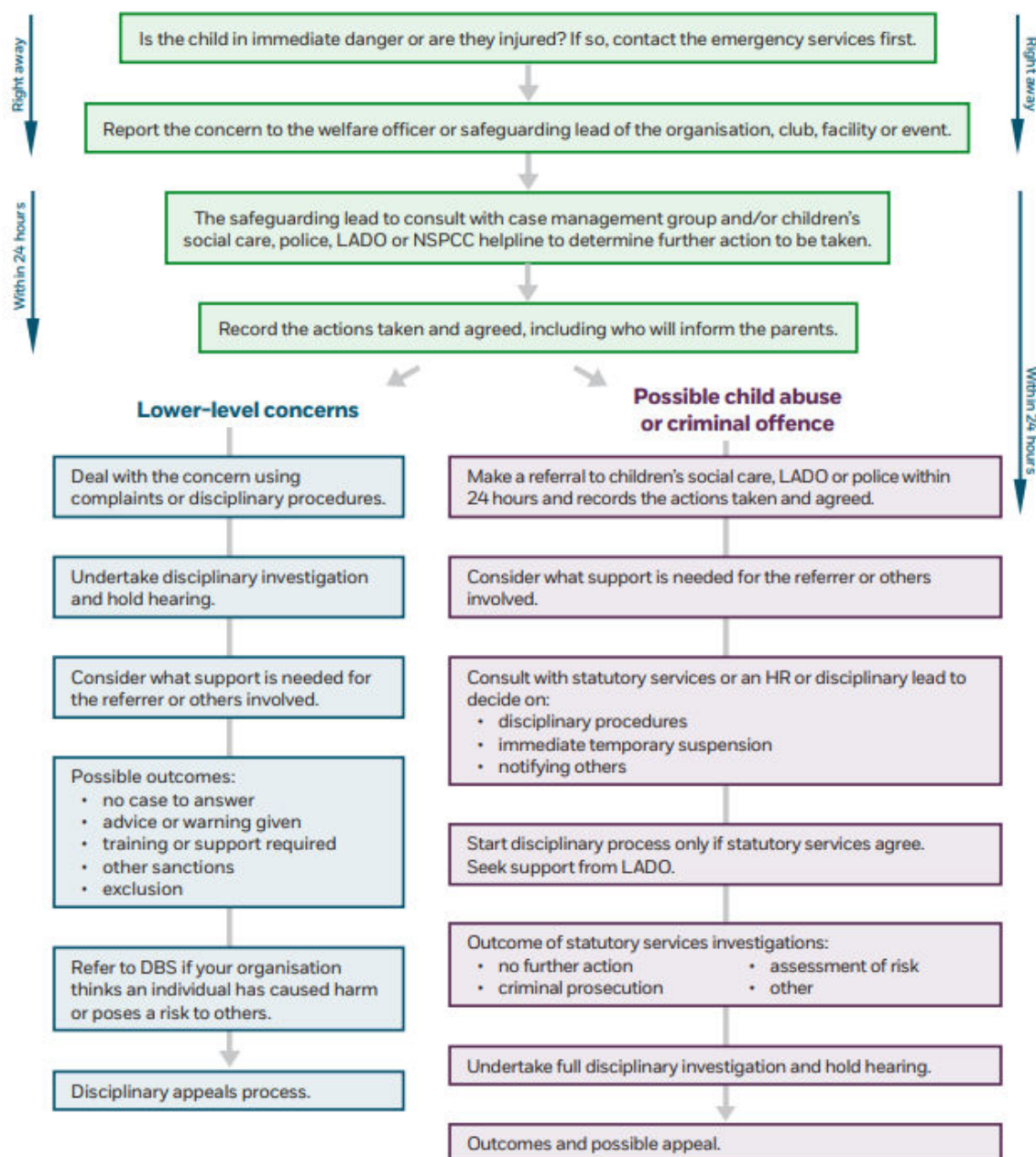
4.6.10 The following safeguarding reporting procedure flowcharts provide guidance on reporting concerns, including online or digital safeguarding concerns, in the following situations:

- (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 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 Safeguarding Reporting Procedure<sup>1</sup>

To be used when a safeguarding concern arises in connection with the NRA's activities, services events, facilities, staff, volunteers, members, participants, affiliated clubs, contractors, visitors or others connected with the charity. Where the flowchart refers to child/children, it is to be read as also including adults at risk.

Please see Section 6 for Safeguarding Contacts.



<sup>1</sup> This flowchart has been adopted from the NSPCC website: Safeguarding reporting procedure for concerns within your sport.

#### **4.8 Provision of Support**

- 4.8.1 Support is available to individuals at all stages – before, during and after an incident, allegation, disclosure or complaint. Support may be provided to the person raising the concern, the person affected, and any other parties involved.
- 4.8.2 Individuals will be assigned an independent point of contact within the NRA (separate from the SLO) who can provide support and ensure their welfare needs are considered.
- 4.8.3 The role of the contact will be to:
- (a) Listen to the concerns/queries of the individual or their family and provide reassurance and emotional support;
  - (b) Explain the safeguarding and case-management process, including what will happen next and expected timescales;
  - (c) Signpost to external organisations and specialist support services (e.g. counselling, advocacy, victim support, mental health services) where required.
- 4.8.4 The contact will not discuss or comment on the details of the case itself and will maintain confidentiality, sharing information only on a strict need-to-know basis.

#### **4.9 Information Sharing**

- 4.9.1 To keep children and adults at risk safe, information must sometimes be shared so that appropriate decisions can be made to protect them. Information will always be shared in line with the Data Protection Act 2018, UK GDPR and statutory safeguarding guidance, ensuring that only those who need the information are made aware of it.

##### **4.9.2 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.
- (e) Low-level concerns or patterns of behaviour indicating emerging risk;
- (f) Concerns arising through digital or online channels (e.g. social media, messaging, image-based abuse).

#### 4.9.3 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 Data Protection Act 2018, UK GDPR and human rights law are not barriers** to justified information sharing for safeguarding purposes.
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 doing so would place a child, adult at risk or another person in danger, prejudice an investigation, or is otherwise inappropriate.
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 a lawful basis and a clear safeguarding need, including where a public-interest test is met.
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.

#### 4.9.4 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 for child protection concerns, and Adult Social Care for concerns about adults at risk. LADOs should be consulted where there are concerns about someone in a position of trust
- (b) DBS must be informed where a person in a regulated activity has been removed, dismissed, redeployed, resigned following safeguarding concerns, or would have been removed had they not left.
- (c) Shooting clubs and other sports organisations – information may be shared with other organisations where necessary to safeguard children or adults at risk. Any sharing must follow a proportionate data-sharing assessment to ensure that only the minimum necessary information is shared, with only those who need it, and in line with data protection requirements.
- (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.

#### 4.10 **Responding to Non-Recent Historic Abuse**

4.10.1 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.

##### 4.10.2 **What is non- recent historic abuse?**

The term 'non-recent' or 'historic' abuse refers to disclosures of physical, emotional, sexual abuse or neglect that occurred in the past, whether the individual is now a child or an adult. This may also include online or image-based abuse that occurred historically. 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.

Many survivors of child abuse experience long-term effects, and individuals who experience abuse in childhood may be at increased risk of further harm later in life.

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 trust or influence, including sports coaches, club officials or individuals with online authority or access.
- (e) Allegations of abuse where there may have been organisational failures to protect children or adults at risk.
- (f) Allegations involving individuals who currently have, or may have, contact with children or adults at risk through shooting or other roles.

## **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
- (e) NRA Social Media and Communications Policy
- (f) NRA Data Protection and Data Use Policy

### **5.2 Monitoring, review and publication**

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

5.2.2 This policy will be formally reviewed annually or sooner where required due to legislation, regulatory changes or any significant incident.

| <b>Version</b> | <b>Date created</b> | <b>Last review date</b> | <b>Next review date</b> | <b>Document author</b>                   |
|----------------|---------------------|-------------------------|-------------------------|------------------------------------------|
| V1             | 03.02.2023          |                         | 03.02.2024              | Nicki Bahia with advice from Bates Wells |
| V2             | 13.12.2025          |                         | 13.12.2026              | Nicki Bahia                              |
| V3             | 05.06.2026          |                         | 05.06.2027              | Nicki Bahia                              |

## **6. Safeguarding Contacts**

**If a child or adult at risk is in immediate danger or at risk of serious harm, call 999 immediately.**

### **National Rifle Association – Safeguarding Lead Officer (SLO)**

Faye Jay

safeguarding@nra.org.uk

01483 798 807

### **National Contacts for Safeguarding**

**Childline** – 24 hour helpline for children

0800 1111

[www.childline.org.uk](http://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](mailto: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 Safeguarding Concern Form**

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 link - [NRA Safeguarding Concern Form – Fill in form](#) or alternatively use the QR code below to access the form.



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.

## **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 practice<sup>2</sup>. Care is needed when adjusting hand and body positions, as well

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<sup>2</sup> <https://www.ukcoaching.org/resources/topics/guides/code-of-practice-for-sports-coaches>

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
- 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 unnecessary 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 one 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**

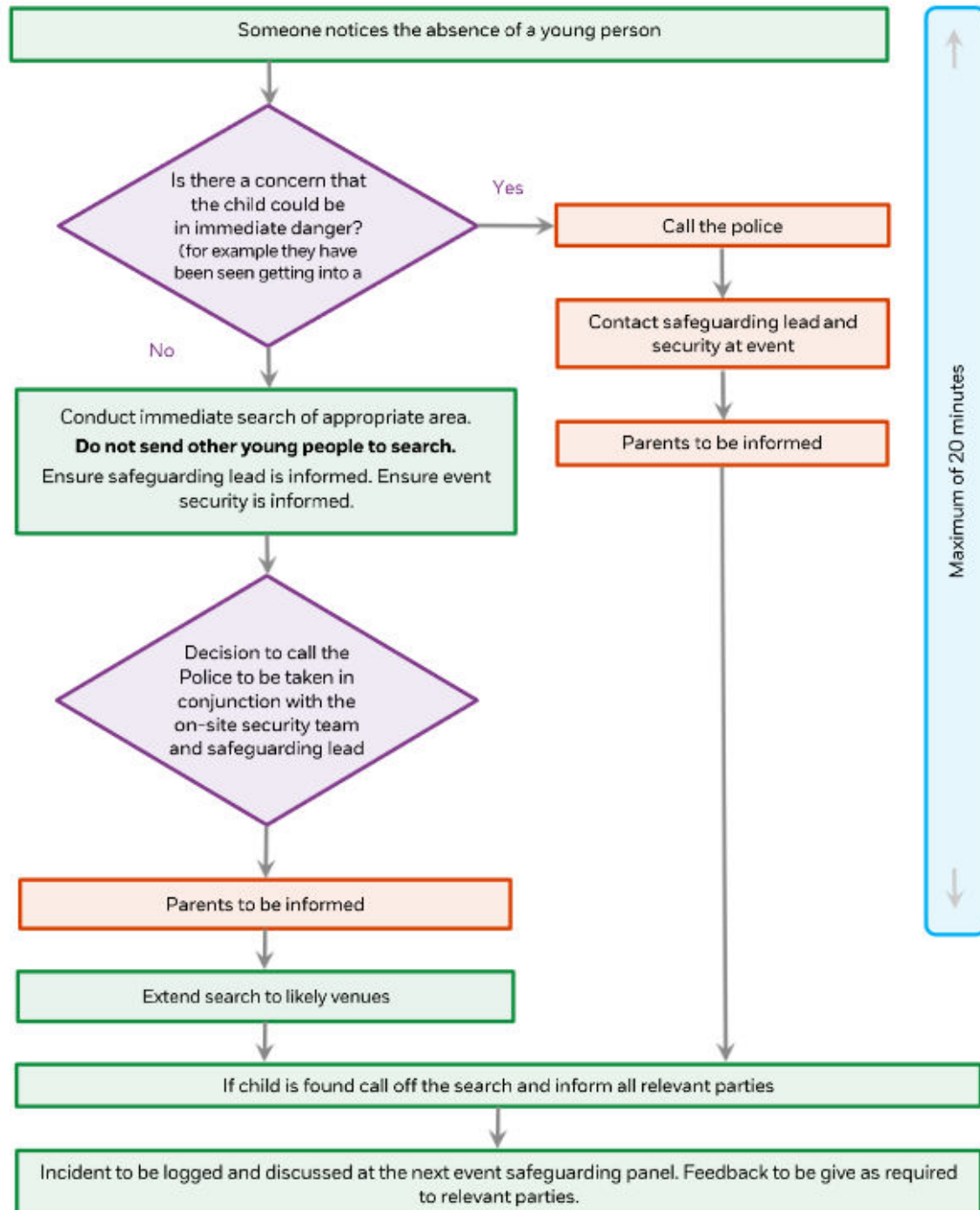
If a child goes missing during an event, the NRA will apply the following procedure:

- 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

Please see Section 6 for Safeguarding Contacts.



### **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 NRA 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 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: Target Markers and Butt Supervisors

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

All target markers and butt supervisors must complete the required training, which includes (but is not limited to) safety procedures, target marking protocols, and emergency response.

Butt supervisors and target markers are positioned within the range butts for the duration of shooting and are required to physically operate mechanical target frames in order to mark and score shots.

Target markers employed by the NRA are often under the age of 18 and may be as young as 15 years old. Butt supervisors are adults aged 18 or over. As such, safeguarding considerations are paramount.

### Recruitment, Vetting, and Staffing

- All butt supervisors must hold a valid Disclosure and Barring Service (DBS) check.
  - **Exception (Imperial Meeting):** The Chief Butts Officer must hold a valid DBS check. While it is not essential for all other supervisors on the range to hold DBS clearance during this period, it is considered desirable.
- The NRA recruit weekend Butts Officers seasonally (March – October), including:
  - One assigned to Century/Short Siberia
  - One assigned to Stickledown
- Additional supervisors may be engaged on an ad hoc basis to meet operational requirements.
- Seasonal Weekends Butts Officers will undergo first aid and safeguarding training

### Supervision of Under-18s

- NRA-employed individuals under the age of 18 must not work in the butts without a supervising adult present, wherever practicable.

### Transport to Stickledown Butts

- A minibus service will be made available to transport markers into Stickledown. Under-18 markers should be encouraged to use the minibus for transport to and from Stickledown.

### Range Regulations and Safeguarding Responsibilities

The Range Regulations include the following provisions:

- Any privately employed marker under the age of 18 must be supervised by an adult at all times.
- Responsibility for safeguarding under-18s rests with the RO, unless the markers have been directly engaged through the NRA.