MEDWAY PUZZLES

SAFEGUARDING POLICY

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Policy approved by Trustees:	Amanda Birch Chair of Trustees
Date approved:	7th September 2026
Policy owner:	Medway Puzzles Trustees

1. INTRODUCTION

Medway Puzzles is committed to safeguarding and promoting the welfare of all children, young people and adults at risk who come into contact with the charity.

Medway Puzzles recognises that safeguarding is everyone's responsibility. Every trustee, member of staff, volunteer, coach, helper and anyone acting on behalf of Medway Puzzles has a responsibility to help keep people safe from abuse, neglect, exploitation and avoidable harm.

This policy applies to all Medway Puzzles activities and services, including:

- Hub and community activities
- Social clubs and support sessions
- Football and disability sport
- SEN activities
- Trips, outings and family events
- Befriending services
- Home visits and support
- Telephone and online support
- Transport provided or arranged by Medway Puzzles
- Fundraising and public events
- Online activities and social media
- Any activity undertaken by a person representing Medway Puzzles

The welfare of the child, young person or adult at risk will always be a primary consideration.

Medway Puzzles will work in partnership with families, carers, statutory agencies, schools, health services, social care, the police, sports organisations and other relevant organisations where this is necessary to protect people from harm.

2. OUR SAFEGUARDING PRINCIPLES

- Everyone has the right to live free from abuse, neglect, discrimination and exploitation.
- The welfare of children and young people is paramount.
- Adults have the right to live safely and to be involved in decisions about their own lives.
- Children, young people, adults at risk and their families should be listened to and treated with dignity andrespect.
- Safeguarding concerns must always be taken seriously.
- Concerns should be reported promptly and never ignored.
- Information should be shared appropriately when necessary to protect someone from harm.
- Safeguarding must be embedded in all areas of Medway Puzzles' work.
- People with disabilities and communication difficulties must be given appropriate support to express theirwishes, feelings and concerns.
- No member of staff or volunteer should attempt to investigate a safeguarding concern themselves.

Medway Puzzles recognises that autistic people and people with disabilities may face additional safeguarding risks because of communication difficulties, dependence on others, social isolation, previous experiences of trauma or abuse, difficulty recognising unsafe behaviour, or reliance on carers and support networks. These factors will be considered when assessing safeguarding concerns.

3. LEGAL AND GUIDANCE FRAMEWORK

This policy has been developed with reference to relevant legislation and statutory guidance, including:

- Children Act 1989
- Children Act 2004
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Data Protection Act 2018
- UK General Data Protection Regulation
- Working Together to Safeguard Children 2023
- Care and Support Statutory Guidance
- Relevant Disclosure and Barring Service guidance
- Charity Commission safeguarding guidance

Working Together to Safeguard Children is statutory guidance setting out expectations for organisations and professionals involved in safeguarding children.

The Care Act 2014 provides the statutory framework for adult safeguarding in England.

The Charity Commission expects trustees to ensure that safeguarding is prioritised and that appropriate systems are in place to protect beneficiaries, staff, volunteers and others who come into contact with the charity.

4. WHO IS RESPONSIBLE FOR SAFEGUARDING?

4.1 Trustees

The Trustees have overall responsibility for ensuring that Medway Puzzles has appropriate safeguarding arrangements in place.

- Approve and regularly review the Safeguarding Policy.
- Ensure appropriate safeguarding procedures are implemented.
- Ensure safeguarding risks are identified and managed.
- Ensure appropriate recruitment and DBS arrangements are in place.
- Ensure staff, volunteers and trustees receive appropriate safeguarding training.

- Ensure safeguarding concerns are properly recorded and acted upon.
- Ensure allegations against staff, volunteers or trustees are dealt with appropriately.
- Ensure serious safeguarding incidents are reported to relevant authorities and, where required, to the CharityCommission.
- Ensure the charity learns from safeguarding incidents and improves its practice.

5. DESIGNATED SAFEGUARDING LEADS

Medway Puzzles will appoint a Designated Safeguarding Lead (DSL) and, where possible, a deputy. The DSL is responsible for coordinating safeguarding concerns but does not replace the responsibility of every member of the organisation to report concerns.

Child Protection / Safeguarding Lead

Paul Harper
Telephone: 07506 114611
Email: paul.harper@medwaypuzzles.co.uk

Safeguarding Lead

Amanda Birch
Telephone: via the office
Email: amanda.birch@medwaypuzzles.co.uk

These details should be checked regularly and updated immediately if responsibilities change. If a safeguarding concern involves the DSL, the concern must be reported directly to the other safeguarding lead, the appropriate statutory authority or the police. If someone is in immediate danger, staff and volunteers must not wait for the DSL. They must contact the emergency services on 999.

6. SAFEGUARDING CHILDREN AND YOUNG PEOPLE

For the purposes of safeguarding, a child is anyone under the age of 18. Medway Puzzles works with children and young people with a wide range of needs, including autistic children and children with disabilities. All children have the same right to protection from abuse and neglect.

Staff and volunteers must remain alert to signs that a child may be experiencing:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Domestic abuse
- Exploitation
- Criminal exploitation
- Sexual exploitation
- Online abuse
- Bullying or cyberbullying
- Discriminatory abuse

- Grooming
- Radicalisation or extremism
- Female genital mutilation
- Forced marriage
- Trafficking or modern slavery
- Abuse by another child or young person

A safeguarding concern may arise from something a child says, something someone else reports, something a member of staff observes, or a change in a child's behaviour or presentation.

7. SAFEGUARDING ADULTS AT RISK

Medway Puzzles recognises that adults can also experience abuse, neglect or exploitation. An adult at risk may be particularly vulnerable because of disability, illness, mental capacity, dependence on others, communication difficulties, social isolation or other circumstances.

Safeguarding concerns may include:

- Physical abuse
- Sexual abuse
- Emotional or psychological abuse
- Financial or material abuse
- Neglect or acts of omission
- Domestic abuse
- Discriminatory abuse
- Organisational or institutional abuse
- Modern slavery
- Exploitation
- Self-neglect
- Coercive or controlling behaviour
- Abuse by a carer, family member, professional, volunteer or another service user

Medway Puzzles will support adults to make their own decisions wherever possible and will respect their wishes, feelings and rights. Where an adult lacks capacity to make a particular decision, Medway Puzzles will act in accordance with the Mental Capacity Act 2005 and relevant safeguarding procedures.

8. TYPES OF ABUSE

8.1 Physical Abuse

Physical abuse includes hitting, kicking, shaking, pushing, burning, poisoning, inappropriate restraint, misuse of medication or any other act causing physical harm.

8.2 Emotional or Psychological Abuse

This includes persistent criticism, humiliation, threats, intimidation, bullying, controlling behaviour, isolation, manipulation or deliberately causing fear or distress.

8.3 Sexual Abuse

Sexual abuse includes any sexual activity where a person does not or cannot freely consent. It includes physical sexual contact and non-contact abuse such as sexual harassment, grooming, sexualised communication, exposure to sexual material and online sexual exploitation.

8.4 Neglect

Neglect includes failing to meet basic physical or emotional needs, failing to provide appropriate supervision, failing to obtain necessary medical attention or failing to protect someone from foreseeable harm.

8.5 Financial Abuse

Financial abuse may include theft, fraud, coercion, misuse of bank accounts, misuse of benefits, pressure concerning money, scams or taking control of someone's finances without proper authority.

8.6 Discriminatory Abuse

This includes abuse based on disability, age, race, religion or belief, sex, sexual orientation, gender reassignment or other protected characteristics.

8.7 Domestic Abuse

Domestic abuse can include physical, emotional, sexual, financial and psychological abuse, as well as coercive and controlling behaviour.

8.8 Exploitation

Children, young people and adults at risk may be exploited for sexual, criminal, financial or other purposes.

9. RECOGNISING SAFEGUARDING CONCERNS

There is no single sign that proves abuse has taken place. Possible indicators may include:

- Sudden changes in behaviour
- Withdrawal or unusual distress
- Fear of a particular person
- Unexplained injuries
- Poor personal hygiene
- Sudden financial difficulties
- Changes in eating or sleeping
- Sexualised behaviour inappropriate to age or development
- Reluctance to attend activities
- Changes in communication
- Missing episodes
- Increased secrecy

- Signs of exploitation
- Sudden loss of possessions or money
- A child or adult directly telling someone that they are being harmed

Staff and volunteers should not assume that a behaviour is simply part of someone's autism or disability. A change from a person's normal behaviour may be significant.

10. IF SOMEONE DISCLOSES ABUSE

DO

- Stay calm.
- Listen carefully.
- Take them seriously.
- Allow them to speak in their own words.
- Reassure them that they have done the right thing by telling you.
- Tell them that you need to share the information with someone who can help keep them safe.
- Record what was said as soon as possible.
- Use the person's own words wherever possible.
- Report the concern immediately to the Safeguarding Lead or appropriate authority.

DO NOT

- Promise confidentiality.
- Ask leading questions.
- Investigate the allegation yourself.
- Confront the alleged perpetrator.
- Ask the person to repeatedly tell their story.
- Make assumptions.
- Tell other people who do not need to know.
- Delay reporting because you are unsure whether the concern is serious enough.

A person does not need to provide proof before a safeguarding concern is reported.

11. IMMEDIATE DANGER OR EMERGENCY

If a child, young person or adult is in immediate danger, call **999**. Examples include serious injury, immediate threat of violence, serious sexual assault, someone missing and believed to be at immediate risk, a suspected criminal offence requiring an immediate police response, or any situation where waiting could place someone at further risk.

Once the immediate danger has been addressed, the Safeguarding Lead must be informed as soon as possible.

12. REPORTING CONCERNS ABOUT CHILDREN

If a concern relates to a child or young person living in Medway, concerns can be reported to Medway Children's Advice and Duty Service.

Telephone: 01634 334 466
Monday to Friday, 9am–5pm

Out of hours: 03000 419 191
Emergency: 999

If the concern relates to a child outside Medway, the appropriate local authority safeguarding service for that area should be contacted.

13. REPORTING CONCERNS ABOUT ADULTS

If an adult is in immediate danger, call **999**. For non-emergency police matters call **101**.

Concerns about abuse or neglect of adults should be reported to the appropriate local authority adult safeguarding service. Medway Puzzles will cooperate fully with the relevant local authority, police and safeguarding partners.

14. INFORMATION SHARING AND CONFIDENTIALITY

Safeguarding information must be handled sensitively and securely. Information will only be shared with people who need it for safeguarding, care, protection or legal purposes.

Where appropriate, Medway Puzzles will explain to the person concerned why information needs to be shared. Consent should normally be sought where appropriate, but consent is not always required to share safeguarding information. Where there is a risk of serious harm, safeguarding concerns must be reported even where consent cannot be obtained.

All safeguarding records must be stored securely and separately from general activity records where appropriate.

15. RECORDING SAFEGUARDING CONCERNS

Every safeguarding concern must be recorded as soon as possible. Records should include:

- Date and time
- Name of person raising the concern
- Name of the child, young person or adult
- What was observed or disclosed
- Exact words used where possible
- Names of witnesses
- Action taken
- Who was contacted
- Advice received
- Decisions made
- Any follow-up required

Records must be factual. Staff and volunteers must distinguish between **FACT** (what they saw or heard), **OPINION** (what they believe may have happened), and **ACTION** (what they did as a result). Safeguarding records must not be altered retrospectively. If an error is made, it should be corrected in a way that preserves the original record.

16. ALLEGATIONS AGAINST STAFF, VOLUNTEERS, TRUSTEES OR COACHES

Medway Puzzles takes allegations against people working with children and adults extremely seriously. An allegation must be considered where a person has: (1) behaved in a way that has harmed, or may have harmed, a child or adult at risk; (2) possibly committed a criminal offence against or relating to a child or adult at risk; or (3) behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm or may be unsuitable to work with them.

The person who receives the allegation must report it immediately. They must not investigate it themselves.

Where the allegation concerns a person working with children, Medway Puzzles will seek advice from the appropriate Local Authority Designated Officer (LADO) and/or the police or children's social care as appropriate.

Where the allegation concerns an adult safeguarding matter, the relevant adult safeguarding service and/or police will be contacted.

If the allegation concerns the Safeguarding Lead, it must be reported to another appropriate senior person or directly to the relevant statutory agency. If the allegation concerns a trustee, another trustee should be informed unless doing so would compromise the safeguarding response.

17. SAFER RECRUITMENT

Medway Puzzles is committed to safer recruitment. Depending on the role, this may include application and recruitment process, identity checks, references, employment history, appropriate DBS checks, verification of qualifications where relevant, safeguarding questions at interview, induction and Code of Conduct.

The level of DBS check will depend on the duties and eligibility of the role. A DBS check is only one part of safer recruitment and does not replace references, supervision, training and good safeguarding practice.

18. TRAINING

All trustees, staff and volunteers whose roles involve contact with children, young people or adults at risk will receive appropriate safeguarding information and training.

Training should cover recognition of abuse, responding to disclosures, reporting and recording concerns, professional boundaries, online safety, equality and inclusion, safer working practices, preventing inappropriate conduct, and safeguarding risks associated with disability and autism.

Safeguarding training will be refreshed regularly and at least every two years, or sooner where guidance, responsibilities or circumstances require it. New staff and volunteers should receive safeguarding information as part of their induction.

19. PROFESSIONAL BOUNDARIES

All staff and volunteers must maintain appropriate professional boundaries. They must not enter into inappropriate personal relationships with beneficiaries, exchange inappropriate messages, use personal social media accounts inappropriately with beneficiaries, meet beneficiaries privately without an appropriate reason, take beneficiaries to their own homes unless specifically authorised as part of an agreed safeguarding arrangement, use inappropriate language or behaviour, use unnecessary or inappropriate physical contact, give inappropriate gifts or money, or use their position to obtain personal advantage.

Where physical contact is necessary, including during sport or to prevent immediate harm, it must be appropriate, proportionate and respectful.

20. FOOTBALL AND SPORTS SAFEGUARDING

Medway Puzzles recognises the additional safeguarding responsibilities associated with football and disability sport. Coaches, volunteers and helpers must follow safeguarding requirements of Medway Puzzles and relevant football governing bodies, maintain appropriate boundaries with players, ensure changing-room arrangements are appropriate, never use humiliating or degrading behaviour as a coaching method, report injuries and safeguarding concerns, follow agreed supervision arrangements, ensure children and adults at risk are treated with dignity, follow appropriate photography and filming procedures, and ensure parents/carers know relevant arrangements for children where appropriate.

Any safeguarding concern arising during football or sports activities must be reported under this policy.

21. TRIPS, ACTIVITIES AND EVENTS

Before activities, trips and events, Medway Puzzles will consider safeguarding risks. This may include appropriate staffing levels, supervision, emergency contacts, medical information, accessibility, communication needs, transport arrangements, behavioural support, risks associated with particular venues, safeguarding concerns relating to participants and emergency procedures.

A risk assessment should be completed where appropriate.

22. HOME VISITS AND BEFRIENDING

Home visits and befriending can provide valuable support but must be undertaken safely. Staff and volunteers should follow the agreed lone-working procedure, keep appropriate records of visits, maintain professional boundaries, report concerns about the home environment or welfare, never ignore concerns because they are considered a private family matter, and contact the emergency services if there is an immediate risk.

Where a volunteer feels unsafe, they must leave the situation and report the concern.

23. TRANSPORT

Anyone providing transport on behalf of Medway Puzzles must follow the charity's transport procedures. Drivers must hold the appropriate driving licence, have appropriate insurance, use a safe and roadworthy vehicle, follow legal requirements concerning seatbelts and child restraints, maintain appropriate boundaries, and report accidents or safeguarding concerns.

Where possible, transport arrangements should avoid a single adult being alone with a child unless this has been specifically authorised and risk assessed.

24. ONLINE SAFETY AND SOCIAL MEDIA

Medway Puzzles recognises that safeguarding concerns can occur online, including cyberbullying, grooming, sexual exploitation, inappropriate messaging, sharing sexual images, fraud or financial exploitation, harassment, hate speech, identity misuse, contact with inappropriate adults and online radicalisation.

Staff and volunteers must not communicate with children or adults at risk through personal accounts in a way that breaches professional boundaries. Official Medway Puzzles communication channels should be used wherever possible. Any safeguarding concern involving social media or online communication must be reported under this policy.

25. PHOTOGRAPHY AND VIDEO

Photographs and videos of children and vulnerable people must only be taken and used in accordance with Medway Puzzles' consent and photography procedures. Staff and volunteers must not take inappropriate photographs, photograph someone in a changing or private area, share images through personal social media, share images without appropriate permission, or store images unnecessarily on personal devices.

Particular care must be taken when photographing children and adults who may not have the capacity to understand the implications of image sharing.

26. EQUALITY, DIVERSITY AND INCLUSION

Medway Puzzles will not tolerate abuse, harassment or discrimination based on disability, age, race, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, marriage or civil partnership, or any other protected characteristic.

Everyone using Medway Puzzles services should be treated with dignity and respect. Reasonable adjustments will be made where necessary to enable people to communicate safeguarding concerns.

27. WHISTLEBLOWING

Medway Puzzles encourages anyone who has a safeguarding concern about the organisation, a member of staff, volunteer, trustee or another person working with beneficiaries to report it. No one should be disadvantaged for raising a genuine safeguarding concern.

Where it is not appropriate to report the concern internally, the person should report directly to the relevant safeguarding authority, police or other appropriate body.

28. CONCERNS ABOUT TRUSTEES

Trustees have particular responsibilities because they have overall governance responsibility for the charity. Any safeguarding concern involving a trustee must be treated seriously.

The charity will consider whether the concern should be reported to the police, social care, the LADO where children are involved, whether the trustee should be suspended from relevant duties while enquiries take place, and whether the Charity Commission needs to be notified.

29. SAFEGUARDING INCIDENTS AND THE CHARITY COMMISSION

Serious safeguarding incidents may need to be reported to the Charity Commission. The Trustees will consider whether an incident meets the Charity Commission's criteria for reporting and will take appropriate action. The charity will cooperate with any investigation by statutory agencies or regulators.

30. WORKING WITH OTHER ORGANISATIONS

Medway Puzzles may work with Medway Council, Kent County Council, Police, NHS services, schools and colleges, social care, football organisations, sports organisations, other charities and community organisations. Safeguarding information will be shared appropriately when necessary to protect someone from harm.

31. SAFEGUARDING AND AUTISM / DISABILITY

Medway Puzzles recognises that safeguarding approaches must be accessible. Some people may communicate differently, use alternative communication, have difficulty identifying unsafe behaviour, be dependent on carers, have difficulty understanding social situations, have sensory needs, display behaviour that communicates distress, or find formal questioning difficult.

Staff must not dismiss a safeguarding concern because a person has autism, a learning disability or another disability. Communication should be adapted to the individual's needs. Where necessary, appropriate communication support should be obtained.

32. RESPONDING TO A SAFEGUARDING CONCERN – SIMPLE PROCEDURE

STEP 1 – LISTEN

Listen calmly and take the concern seriously.

STEP 2 – PROTECT

If someone is in immediate danger, call **999**.

STEP 3 – REPORT

Tell the Medway Puzzles Safeguarding Lead immediately, unless the concern involves that person.

STEP 4 – REFER

Where necessary, contact Children's Services, Adult Safeguarding, the police or another appropriate statutory service.

STEP 5 – RECORD

Complete the safeguarding record promptly.

STEP 6 – STORE

Keep the record securely and only share it with those who need to know.

STEP 7 – FOLLOW UP

The Safeguarding Lead will ensure appropriate follow-up action is taken and recorded.

33. SAFEGUARDING CONTACT DETAILS

MEDWAY PUZZLES – Child Protection / Safeguarding Lead

Paul Harper
Telephone: 07506 114611
Email: paul.harper@medwaypuzzles.co.uk

MEDWAY PUZZLES – Safeguarding Lead

Amanda Birch
Telephone: via the office
Email: amanda.birch@medwaypuzzles.co.uk

MEDWAY CHILDREN'S SERVICES

Children's Advice and Duty Service
Telephone: **01634 334 466**
Monday–Friday, 9am–5pm
Out of hours: **03000 419 191**
Emergency: **999**

MEDWAY ADULT SAFEGUARDING

For concerns about abuse or neglect of an adult at risk, contact Medway Adult Social Care / safeguarding services.

Emergency: **999**

Police non-emergency: **101**

NSPCC HELPLINE

0808 800 5000

34. POLICY REVIEW

This policy will be reviewed at least annually. It will also be reviewed sooner where legislation changes, government guidance changes, local safeguarding arrangements change, there is a serious safeguarding incident, Medway Puzzles changes its activities or services, or trustees identify a need for revision.

The Trustees will ensure that the policy remains appropriate for the charity's activities and the people it supports.

35. TRUSTEE APPROVAL

This policy was reviewed and approved by the Trustees of Medway Puzzles.

Trustee 1	**Trustee 2**
Signed: Signed copy held by the charity	Signed: Signed copy held by the charity
Name: Amanda Birch	Name: Paul Harper
Role: Chair of trustees	Role: Trustee

Date: 7th September 2026	Date: 7th September 2026

APPENDIX A – REPORTING A SAFEGUARDING CONCERN

A safeguarding concern arises

A concern may arise because someone tells you something, you see something, someone reports something to you, you notice a change in behaviour, or you have concerns about someone's welfare.
DO NOT investigate the concern yourself.

Is anyone in immediate danger?

YES: Call 999, then inform the Safeguarding Lead as soon as possible.
NO: Continue to report the concern.

Report the concern

Paul Harper – Safeguarding Lead: 07506 114611
Amanda Birch – Safeguarding Lead: via the office
If the concern involves either Safeguarding Lead, report it to the other lead or directly to the appropriate statutory agency.

Record the concern

Record what happened, what was said, who was involved, date and time, what you saw or heard, action taken, who was contacted and advice received. Use the person's own words wherever possible.

Refer where necessary

Child / young person: Medway Children's Services 01634 334 466; out of hours 03000 419 191.
Adult at risk: Contact the appropriate Adult Safeguarding service.
Immediate danger: 999.

Safeguarding Lead

The Safeguarding Lead will review the concern, consider immediate risks, ensure appropriate referral, contact statutory agencies where required, maintain secure records, ensure follow-up action, inform trustees where appropriate and consider whether the Charity Commission needs to be notified.

APPENDIX B – WHAT TO SAY IF SOMEONE DISCLOSES ABUSE

Useful responses include:

- "Thank you for telling me."
- "I am glad you told me."
- "You have done the right thing by telling me."
- "I need to tell someone who can help keep you safe."

Avoid saying:

- "I promise I won't tell anyone."
- "Are you sure?"

- "Why didn't you tell someone before?"
- "What happened next?" repeatedly or in a way that becomes an investigation.

The person's safety is the priority.

APPENDIX C – SAFEGUARDING RECORD – MINIMUM INFORMATION

Name of person concerned:	
Date of birth (if known):	
Date and time of concern:	
Date and time reported:	
Name of person reporting:	
What was seen/heard/reported:	
Exact words used, where possible:	
Immediate action taken:	
Safeguarding Lead contacted:	
External agency contacted:	
Advice/action agreed:	
Further action required:	
Signature:	
Date:	