



NEWARK RUGBY
COMMUNITY FOUNDATION
EDUCATE. ENERGISE. EMPOWER.

NRCF SAFEGUARDING POLICY 2026

Safeguarding Children, Young People and Adults at Risk Policy

Part 1 of the NRCF Safeguarding Handbook

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Safeguarding Children, Young People and Adults at Risk Policy

Part 1 of the NRCF Safeguarding Handbook

This Policy sets the mandatory safeguarding requirements for NRCF. The Safeguarding Handbook explains how those requirements are implemented in practice.

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Controlled safeguarding document family

This Policy is the mandatory governance document. The Safeguarding Handbook (Modules 1-8) explains how the Policy is implemented. The Safeguarding Forms & Templates pack contains the controlled working records SG01-SG10. SGR05 - Safeguarding Contacts & Referral Directory provides the operational, print-ready reference guide for statutory referral routes, mirrored in Tab 1 (Directory) of the central NRCF_Safeguarding_Master_Register.xlsx.

- Appendix A – NRCF Safeguarding Handbook framework
- Appendix B – Principal legal and regulatory references
- Appendix C – Document approval and revision history

1. Policy Statement and Purpose

Newark Rugby Community Foundation (NRCF or the Foundation) is committed to safeguarding and promoting the welfare of every child, young person and adult at risk who comes into contact with the Foundation through its work.

The welfare and safety of participants are paramount and take precedence over organisational, operational, financial or reputational considerations. Safeguarding is everyone's responsibility. NRCF will create safe, inclusive and supportive environments; prevent harm where reasonably possible; identify concerns early; respond promptly; share information appropriately; and learn from concerns and incidents.

NRCF operates its own safeguarding governance, personnel, policies, procedures, reporting routes and records. Partnership with Newark Rugby Club, the RFU, schools, local authorities, statutory agencies or community organisations does not transfer or reduce NRCF's safeguarding responsibilities.

1.1 Relationship with the NRCF Safeguarding Handbook

This Policy forms Part 1 of the NRCF Safeguarding Handbook. The Policy establishes what NRCF requires; the Handbook explains how those requirements are implemented in practice through procedures, codes, guidance, flowcharts, forms, checklists and controlled operational resources.

No Handbook document, partnership arrangement or local procedure may reduce or override a requirement of this Policy. Where a conflict arises, applicable law and statutory requirements take precedence.

2. Scope and Application

This Policy applies to all trustees, employees, coaches, mentors, volunteers, young leaders, agency workers, contractors, consultants, students, work placements and any other person acting for or on behalf of NRCF.

It applies to all Foundation activity, including rugby and physical activity, mentoring, leadership programmes, school and curriculum activity, community events, diversionary provision, trips, transport, residential or overnight activity, digital communication and online delivery.

For safeguarding purposes, a child is any person under 18 years of age. Adult safeguarding is considered in accordance with the Care Act framework and applicable local multi-agency arrangements.

3. Definitions, Terminology and Acronyms

The following terms are used throughout this Policy. Statutory terms are interpreted in accordance with the legal framework in section 4.

Term / acronym	Meaning
NRCF	Newark Rugby Community Foundation.
Adult	A person aged 18 years or over.
Adult at Risk / AaR	NRCF shorthand for an adult who may fall within the Care Act safeguarding framework; the statutory Care Act test remains determinative.
Child / Children	Any person under 18 years of age.
Participant	Any child, young person or adult who engages with an NRCF activity, programme or service.
DSL	Designated Safeguarding Lead.
DDSL	Deputy Designated Safeguarding Lead.
DBS	Disclosure and Barring Service.
KCSIE	Keeping Children Safe in Education.
WTSC	Working Together to Safeguard Children.
MASH	Multi-Agency Safeguarding Hub.
LADO	Local Authority Designated Officer.
PiPoT	Person in a Position of Trust.
RFU	Rugby Football Union.
Regulated Activity	Activity falling within the statutory safeguarding framework for which particular barring and DBS provisions apply.

Term / acronym	Meaning
Staff	Employees and other workers acting for NRCF where the context expressly includes them. Volunteers are not automatically treated as employees or workers.
Volunteer	A person undertaking an agreed unpaid role on behalf of NRCF.
Trustee	A charity trustee of NRCF and member of its governing body.

For adult safeguarding, an adult safeguarding concern may arise where an adult has needs for care and support, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves from that abuse, neglect or risk. The term 'adult at risk' is used in this Policy as practical shorthand and does not replace the statutory test.

4. Legal, Statutory and Regulatory Framework

NRCF will comply with applicable law and have regard to statutory and regulatory guidance relevant to its activities in England. This Policy takes effect on 1 September 2026 and has been prepared against the safeguarding framework in force from that date.

- Children Act 1989 and Children Act 2004.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026 where NRCF works within, for or in partnership with schools and colleges, with relevant standards also adopted as organisational good practice for child-facing work.
- Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012 and relevant 2026 changes to regulated activity.
- Police Act 1997 and current Disclosure and Barring Service eligibility and referral guidance.
- Sexual Offences Act 2003, including relevant positions-of-trust provisions.
- Care Act 2014, Care and Support statutory guidance and Mental Capacity Act 2005.
- Equality Act 2010 and Human Rights Act 1998.
- UK GDPR and Data Protection Act 2018, as amended.
- Counter-Terrorism and Security Act 2015 and applicable Prevent guidance.
- Online Safety Act 2023 where an NRCF-operated service falls within scope.
- Charity law and current Charity Commission safeguarding and serious incident reporting requirements.
- Current Nottinghamshire child and adult safeguarding partnership procedures and relevant RFU safeguarding rules and guidance.

The DSL will maintain oversight of relevant legislative, statutory-guidance, regulatory and local safeguarding changes and recommend updates to this Policy or the Handbook as appropriate.

5. Safeguarding Principles

- Child-centred and person-centred practice: listen, take concerns seriously and consider wishes, feelings, communication needs and best interests.
- Prevention: design activities, recruitment, supervision and environments to reduce foreseeable risk.
- Early support and intervention: act when needs or concerns first emerge; do not wait for proof of significant harm.
- Professional curiosity: notice changes, patterns, inconsistencies and contextual risks and respectfully explore them.
- Partnership working: cooperate appropriately with families, schools, safeguarding partners and statutory agencies.
- Accountability: maintain clear ownership, records, decisions, escalation and trustee oversight.
- Inclusion and anti-discrimination: challenge racism, discrimination and unequal treatment and recognise how these may create or compound safeguarding risk.
- Proportionality and confidentiality: share information lawfully, necessarily and proportionately.
- Continuous improvement: learn from concerns, complaints, allegations, incidents, audits and reviews.

6. Roles, Responsibilities and Governance

6.1 Board of Trustees

The Board of Trustees retains ultimate accountability for safeguarding governance. Delegation of operational responsibilities to the DSL does not transfer or reduce that accountability.

- Approve and review this Policy and the supporting safeguarding framework at least annually.
- Appoint a Safeguarding Lead Trustee and ensure an appropriately trained DSL and sufficient DDSL cover.
- Ensure proportionate safeguarding resources, training, safer recruitment, supervision, record-keeping and case-management arrangements.
- Receive anonymised safeguarding assurance information at least quarterly and urgent escalation of serious matters.
- Maintain safeguarding within the organisational risk-management arrangements and monitor significant actions.
- Consider and authorise Charity Commission serious incident reporting where applicable.
- Ensure significant safeguarding learning is acted upon.

6.2 Safeguarding Lead Trustee

The Safeguarding Lead Trustee provides Board-level oversight, scrutiny and constructive challenge. The role does not routinely manage safeguarding cases.

- Maintain regular contact with the DSL and receive appropriate assurance information.
- Scrutinise safeguarding performance, risks, compliance, themes and improvement actions.
- Provide an alternative internal escalation route where a concern relates to the DSL/DDSL or normal routes are inappropriate.
- Support the Board in considering significant incidents, external notifications and organisational learning.
- Undertake safeguarding governance training appropriate to the role.

6.3 Managers and Programme Leads

Managers and programme leads are responsible for implementing NRCF safeguarding requirements within the activities, teams and partnerships for which they are responsible.

- Ensure personnel understand their safeguarding responsibilities and complete required recruitment, vetting, induction and training.
- Identify and manage safeguarding risks within programmes, venues, staffing arrangements and partnerships.
- Promote professional boundaries and safer working practice.
- Ensure concerns are reported promptly to the DSL/DDSL and do not undertake unauthorised safeguarding investigations.
- Cooperate with safeguarding processes and implement safeguarding decisions and risk-management measures.

6.4 All Staff, Coaches, Mentors and Volunteers

Safeguarding is everyone's responsibility. All personnel must:

- Read, understand and comply with this Policy and the safeguarding requirements relevant to their role.
- Complete required safeguarding induction, training and refresher activity.
- Maintain appropriate professional boundaries and follow NRCF's Code of Conduct.
- Remain alert to safeguarding concerns and disclosures.
- Report safeguarding concerns immediately and never decide that a concern is too minor to report.
- Prioritise immediate safety, listen without investigating, avoid promises of confidentiality and make accurate records.
- Cooperate fully with safeguarding enquiries, referrals and risk-management arrangements.
- Report concerns about the conduct or suitability of colleagues, contractors or volunteers and use whistleblowing arrangements where necessary.

Personnel are not expected to determine whether abuse has occurred. Their responsibility is to recognise, respond appropriately, record and report.

7. Designated Safeguarding Arrangements

7.1 Designated Safeguarding Lead

NRCF will appoint a suitably experienced and trained DSL with sufficient authority, time, resources and access to trustees.

- Receive, assess and coordinate safeguarding concerns and referrals.
- Make or coordinate referrals to statutory and other bodies where required.
- Maintain secure safeguarding records, chronologies and decision logs.
- Advise and support personnel and oversee relevant safeguarding procedures.
- Maintain current local safeguarding contacts and referral pathways.
- Oversee safeguarding training compliance and safer recruitment assurance.
- Identify patterns, emerging risks and organisational learning.
- Provide anonymised safeguarding assurance information to trustees.

7.2 Deputy Designated Safeguarding Lead

At least one DDSL will be appointed and trained to act when the DSL is unavailable. The DSL remains the lead role unless responsibilities are formally delegated.

8. Mandatory Safeguarding Training and Competence

NRCF requires safeguarding training proportionate to role and risk. Detailed training content, evidence and renewal arrangements are set out in Safeguarding Handbook Module 1, section 1.6 (Training and Competence Framework).

8.1 Safeguarding Induction

All relevant personnel must receive safeguarding induction appropriate to their role before, or as soon as reasonably practicable after, commencing duties. No person may undertake unsupervised safeguarding-sensitive duties until applicable induction and pre-deployment requirements have been completed.

8.2 Core Safeguarding Training

Personnel whose roles involve contact with participants must receive core safeguarding training covering recognition of harm, responding to concerns and disclosures, reporting and escalation, professional boundaries, allegations and low-level concerns, child-on-child harm, online safety, information sharing, equality and whistleblowing.

8.3 DSL and DDSL Training

The DSL and each DDSL must complete enhanced role-specific training, formal refresher training at least every two years and safeguarding updates or continuing professional development at least annually.

8.4 Trustee Training

All trustees must receive safeguarding training appropriate to their governance responsibilities and updates at least annually. The Safeguarding Lead Trustee must undertake additional training appropriate to that role.

8.5 Role-Specific and Safer Recruitment Training

NRCF will identify additional training requirements according to role and risk. At least one person substantively involved in selection for a safeguarding-sensitive role must have completed appropriate safer recruitment training.

8.6 Training Records and Compliance

NRCF will maintain current records of required and completed safeguarding training, refresher dates and outstanding requirements. Where mandatory training is incomplete or expired, NRCF will assess whether duties must be restricted, supervised or suspended until requirements are met.

9. Safer Recruitment, Vetting, DBS and Ongoing Suitability

NRCF will use safer recruitment arrangements proportionate to the role and safeguarding risk to prevent unsuitable people gaining access to children or adults at risk.

9.1 Recruitment and Pre-Deployment Controls

- Define safeguarding responsibilities and assess the role's level and nature of contact with participants.

- Determine regulated-activity status and the lawful level of DBS/barred-list check.
- Use appropriate application, history scrutiny, interview and reference processes for safeguarding-sensitive roles.
- Verify identity, right to work, qualifications and professional registration where applicable.
- Consider overseas checks where appropriate and available.
- Complete required safeguarding induction, training and deployment authorisation before unsupervised safeguarding-sensitive duties.

9.2 Regulated Activity and DBS

NRCF will determine regulated-activity status under the law in force at deployment. From 1 September 2026, supervision must not be relied upon to exclude an otherwise qualifying unpaid role with children from regulated activity.

NRCF will only request DBS and barred-list information where legally entitled to do so and will maintain a role-based DBS and regulated-activity matrix within the Handbook.

9.3 Barred Persons, Referrals and Ongoing Suitability

NRCF will not knowingly permit a barred person to undertake relevant regulated activity. Where the statutory conditions are met, NRCF will make the required DBS referral.

Suitability will be kept under review throughout a person's involvement with NRCF. A change of duties, new safeguarding information or other relevant concern may trigger reassessment, additional checks, supervision, restrictions or other appropriate action.

Detailed safer recruitment processes are set out in Safeguarding Handbook Module 5 (Safer People). Operational records are maintained using SG05 (Safer Recruitment & Deployment Record) in the Safeguarding Forms & Templates pack.

10. Professional Standards and Safer Working Practice

All personnel must maintain professional boundaries and behave in ways that protect participants and themselves from harm, misunderstanding or avoidable risk.

Personnel must:

- Treat participants with dignity, respect and fairness.
- Use approved communication channels and avoid secretive or inappropriate relationships.
- Follow approved arrangements for one-to-one work, touch, transport, changing and private spaces, online contact, photography and other higher-risk activity.
- Respect participants' privacy when using changing, showering, toilet or other private facilities and must not change, shower or undress in the presence of children.
- Not use degrading, sexualised, discriminatory, intimidating or exploitative language or behaviour.
- Report boundary concerns, including concerns about colleagues, rather than normalising them.

Detailed requirements are contained in the NRCF Code of Conduct and Safer Working Practice guidance within the Handbook.

11. Recognising Safeguarding Concerns

All personnel must remain alert to signs, disclosures, behaviours or circumstances that may indicate abuse, neglect, exploitation or other harm. Proof is not required before raising a concern.

- Physical, emotional or sexual abuse and neglect.
- Domestic abuse and its impact on children or adults.
- Child sexual or criminal exploitation, trafficking, grooming and extra-familial harm.
- Child-on-child abuse, bullying, harmful sexual behaviour and discriminatory abuse.
- Online abuse, image-based abuse, coercion, harassment and technology-facilitated harm.
- Radicalisation or exploitation by extremist influences.
- Adult safeguarding concerns including financial/material abuse, organisational abuse and self-neglect.
- Concerns about professional boundaries, positions of trust or unsafe organisational practice.

Safeguarding concerns may coexist with wellbeing, behavioural, disability, communication or mental-health needs. An alternative explanation does not remove the duty to report a concern.

12. Responding to a Disclosure or Concern

Any disclosure or safeguarding concern must be taken seriously. Personnel must:

- Prioritise immediate safety.
- Listen calmly without investigating or asking unnecessary or leading questions.
- Not promise confidentiality.
- Make an accurate and timely record using the person's own words where possible.
- Report immediately to the DSL/DDSL.
- Continue appropriate support and avoid repeated questioning.

Detailed reporting and referral requirements are set out in Safeguarding Handbook Modules 2 and 3. SG01 (Safeguarding Concern Form) and SG02 (DSL Case Management Record) provide the associated operational records, and SGR05 provides the live contacts and referral routes.

13. Reporting, Decision-Making, Referral and Escalation

All safeguarding concerns must be reported to the DSL or DDSL as soon as possible. Personnel must not decide that a concern is too minor to report.

Where a child or adult is in immediate danger, emergency action takes priority. Emergency services must be contacted where necessary and the DSL informed as soon as practicable.

The DSL/DDSL will assess the information, determine the appropriate safeguarding response, make or coordinate referrals where required and record the decision and rationale.

If the DSL is implicated, the concern must be reported directly to the Safeguarding Lead Trustee or Chair. If internal reporting is unavailable, inadequate or would create unsafe delay, personnel may contact the appropriate statutory authority directly.

14. External Safeguarding Referral Pathways

14.1 General Principle

NRCF will refer safeguarding concerns to the appropriate statutory or specialist agency whenever necessary to protect a child, young person or adult at risk, obtain safeguarding advice or fulfil a legal or regulatory responsibility.

Internal investigations, management processes, reputational considerations or partnership arrangements must not delay or prevent an appropriate referral.

14.2 Immediate Danger or Suspected Crime

Where there is immediate risk to life or serious harm, emergency action takes priority. The police or emergency services will be contacted as appropriate. NRCF will avoid enquiries that could prejudice a criminal or statutory safeguarding investigation.

14.3 Concerns About a Child

Where the relevant statutory safeguarding threshold may be met, the DSL/DDSL will refer to the appropriate local authority children's social care service in accordance with current local arrangements.

14.4 Family Help and Additional Support

Where a child or family may benefit from additional support but statutory safeguarding intervention is not indicated, NRCF will consider the appropriate Family Help, early support or other support pathway. Such support must not be used as an alternative to a statutory referral where a safeguarding threshold is met.

14.5 Allegations About People Working or Volunteering With Children

Where a concern about a person working or volunteering with children may meet the relevant allegations threshold, NRCF will follow the applicable LADO arrangements without delay and will not undertake a substantive internal investigation that could prejudice statutory processes.

14.6 Adult Safeguarding and PiPoT

Where the adult safeguarding threshold may be met, the DSL/DDSL will consider referral to the appropriate local authority adult safeguarding service. Where a concern relates to a person working or volunteering with adults with care and support needs, NRCF will consider the applicable PiPoT arrangements.

14.7 Escalation and Direct Referral

NRCF will follow up referrals and use relevant escalation or professional-disagreement procedures where it remains concerned that a child or adult is not being adequately protected. Any member of personnel may make a direct statutory referral where immediate action is required or internal reporting would create unsafe delay.

14.8 Controlled Contacts and Recording

NRCF will maintain SGR05 - Safeguarding Contacts & Referral Directory alongside Tab 1 (Directory) of the NRCF_Safeguarding_Master_Register.xlsx as live operational resources supporting this Policy and the Handbook. The DSL is responsible for ensuring both are reviewed at least quarterly and updated promptly when arrangements change.

External safeguarding advice, consultations, referrals and escalation decisions must be recorded, including the rationale for significant decisions.

15. Allegations Concerning Adults Working or Volunteering With Children

Any allegation or concern about a trustee, employee, coach, mentor, volunteer, contractor or other person working with children must be reported immediately under Safeguarding Handbook Module 4 (Concerns About Adults Working With Participants), using SG04 (Allegation & Conduct Case Record) where applicable.

- NRCF will seek LADO advice or make a referral where the applicable threshold may be met.
- Safeguarding, employment/volunteer management and disciplinary processes will be coordinated but remain distinct.
- Interim risk-management measures will be protective and neutral, not assumptions of guilt.
- NRCF will consider required DBS, Charity Commission, RFU, professional-regulator or other notifications at the appropriate stage.

16. Low-Level Concerns

Behaviour that is inconsistent with NRCF's Code of Conduct or expected professional boundaries, but may not meet the allegation threshold, must still be reported and considered.

Low-level concerns will be recorded and reviewed so that patterns, cumulative concerns or emerging risks can be identified. Detailed arrangements are contained in Safeguarding Handbook Module 4, with SG03 used as the Low-Level Concern Record.

17. Adult Safeguarding and Persons in Positions of Trust

17.1 Commitment and Threshold

NRCF is committed to safeguarding adults who come into contact with the Foundation. Adult safeguarding will be considered in accordance with the Care Act framework and applicable local multi-agency procedures.

NRCF recognises that adults have the right to make their own decisions and will support choice and control wherever possible.

17.2 Adult Safeguarding Principles

NRCF will apply the principles of empowerment, prevention, proportionality, protection, partnership and accountability.

17.3 Capacity, Consent and Making Safeguarding Personal

NRCF will seek to make adult safeguarding person-led and outcome-focused, taking account of the adult's wishes, feelings, desired outcomes and capacity. Capacity will be presumed unless there is reason to believe otherwise. Information may be shared without consent where there is a lawful and proportionate safeguarding reason to do so.

17.4 Responding and Referring

Adult safeguarding concerns must be reported immediately to the DSL/DDSL. Where the statutory threshold may be met, NRCF will consider referral to the appropriate adult safeguarding service and will not delay an appropriate referral while attempting to establish proof.

17.5 Persons in Positions of Trust

Where a concern indicates that a person who works or volunteers with adults with care and support needs may present a safeguarding risk, NRCF will consider applicable PiPoT arrangements, organisational risk-management action and any relevant information-sharing or external referral duties.

Detailed adult safeguarding decision-making is contained in Handbook Module 3 and PiPoT/conduct arrangements in Module 4, supported by SGR05 for current referral routes.

18. Child-on-Child Abuse, Bullying and Harmful Behaviour

NRCF recognises that children can harm other children and that such behaviour must not be dismissed as banter, part of growing up or an inevitable feature of sport.

Concerns may include bullying, cyberbullying, discriminatory abuse, sexual harassment, sexual violence, harmful sexual behaviour, coercion, exploitation, initiation-type behaviour and abuse within peer or intimate relationships.

All such concerns must be reported. NRCF will consider the safety and safeguarding needs of all children involved and seek appropriate specialist or statutory advice where required.

19. Online Safety, Communications, Images and Technology

Safeguarding expectations apply equally online. NRCF will maintain appropriate controls for electronic communication, social media, online mentoring, livestreaming, photography/video, image consent, publication, devices, storage and emerging technology.

New digital services involving children's data or direct interaction must be assessed for safeguarding and privacy risk before deployment. Personal accounts and unapproved disappearing-message channels must not be used for safeguarding-sensitive NRCF communication.

20. Information Sharing, Confidentiality and Safeguarding Records

Effective safeguarding depends on timely and lawful information sharing. Data protection law does not prevent necessary and proportionate safeguarding information sharing where an appropriate lawful basis applies.

- Do not promise absolute confidentiality.
- Share only information that is necessary, relevant, accurate, timely and secure.
- Record significant decisions to share or not share information and the reasons.
- Maintain safeguarding records separately from routine personnel or programme records with role-based access.
- Use a case chronology for significant or ongoing concerns.
- Apply approved retention and secure disposal arrangements.

NRCF will maintain secure safeguarding case-management arrangements. Safeguarding records must not be stored in personal email accounts, informal messaging threads or unapproved personal devices.

21. Partnership, School and Commissioned Delivery

Before delivery with a school, club, commissioner or community partner, NRCF will agree safeguarding responsibilities, reporting routes, allegations management, information sharing, vetting assurance and emergency arrangements.

NRCF remains responsible for its own personnel and safeguarding duties. Where delivery takes place within a school or college, NRCF personnel will follow the host setting's safeguarding procedures and relevant KCSIE requirements without creating delay or ambiguity about NRCF's own reporting responsibilities.

Use of a partner's premises, facilities or operating arrangements does not disapply NRCF's safeguarding requirements. Where activities involve changing rooms, showers, toilets, accommodation or other safeguarding-

sensitive private spaces, NRCF must ensure that arrangements are consistent with this Policy and the Safeguarding Handbook before delivery begins.

22. Equality, Inclusion and Anti-Discriminatory Safeguarding

NRCF will promote an inclusive, anti-discriminatory safeguarding culture. Safeguarding practice will consider how disability, race, sex, religion or belief, language, poverty, communication needs, care experience, family circumstances or other factors may affect exposure to harm, recognition of harm or access to help.

Racism, discrimination and discriminatory abuse will be challenged and treated as welfare or safeguarding concerns where appropriate. Reasonable adjustments and accessible communication will be used so that participants can understand their rights and raise concerns.

23. Whistleblowing, Complaints and Speaking Up

Everyone must be able to raise safeguarding concerns without fear of retaliation. NRCF will maintain appropriate whistleblowing and complaints arrangements with clear escalation routes.

No person will suffer detrimental treatment for raising a genuine safeguarding concern in good faith. Where a concern is not addressed appropriately, personnel should escalate internally and/or to the appropriate statutory or regulatory body.

24. External Notifications, Serious Incidents and Organisational Learning

Safeguarding incidents may require referral or notification to more than one body. NRCF will consider, as applicable, the police, children's social care, adult safeguarding, LADO, DBS, Charity Commission, RFU, a school or commissioner, insurer or professional regulator.

Protective safeguarding referrals and regulatory or governing-body notifications are separate obligations. Informing one organisation does not automatically discharge duties owed to another.

Decisions to notify or not notify will be recorded with the rationale and any advice obtained. NRCF will review significant incidents and ensure learning is translated into appropriate improvements.

25. Safeguarding Assurance, Monitoring and Review

25.1 Board Assurance

The Board will maintain proportionate oversight of the implementation and effectiveness of this Policy and the wider Safeguarding Handbook.

The DSL will provide anonymised safeguarding assurance information to the Safeguarding Lead Trustee and Board at least quarterly, including relevant information on concerns and referrals, allegations and low-level concerns, training compliance, safer recruitment/DBS compliance, significant risks, external notifications, outstanding actions and organisational learning.

Significant safeguarding matters requiring urgent governance oversight will be escalated without waiting for the next routine report.

25.2 Audit, Risk and Learning

NRCF will undertake safeguarding audit and quality-assurance activity proportionate to its size, activities and risk. Material safeguarding risks will be reflected in the organisational risk-management arrangements, and improvement actions will be allocated, monitored and completed.

25.3 Policy and Handbook Review

This Policy will be reviewed at least annually and sooner following material legal or guidance changes, serious incidents, significant organisational change, audit findings or other developments indicating that review is required.

The DSL may update non-material operational Handbook content under delegated authority where changes maintain or strengthen this Policy. Material changes to safeguarding responsibilities, governance arrangements or Policy requirements require appropriate Board approval.

NRCF will maintain document control and version records for this Policy and the Handbook. Superseded versions will be withdrawn from operational use and retained where necessary for governance, legal, regulatory or evidential purposes.

Appendix A – NRCF Safeguarding Handbook Framework

The Safeguarding Handbook is the practical operating framework supporting this Policy. It should be modular, role-based and easy to use. The following structure is the minimum expected framework:

Module	Purpose	Examples of resources
1. Your safeguarding responsibilities	What each role must know and do.	Role cards, Code of Conduct, training requirements.
2. If you are worried about someone	Front-line recognition, response and reporting.	Quick guide, disclosure guidance, concern form.
3. DSL/DDSL case management	Assessment, statutory referral, escalation and recording.	Referral procedure, decision tools, contacts directory, chronology.
4. Allegations and concerns about adults	LADO, low-level concerns, PiPoT and relevant referrals.	Managing Allegations Procedure, Low-Level Concern Record (SG03), Allegation Case Record (SG04).
5. Safer people	Recruitment, DBS, regulated activity, induction and ongoing suitability.	Safer Recruitment Procedure, Safer Recruitment & Deployment Record (SG05), DBS & Regulated Activity Matrix.
6. Safer activities	Safe delivery of coaching, mentoring, trips, transport, online activity and images.	Safer Working Practice, Programme & Activity Safeguarding Plan (SG06), online/image guidance.
7. Working with others	Schools, clubs, contractors, commissioners and partners.	School & Partner Safeguarding Interface (SG07).
8. Governance and assurance toolkit	Oversight, serious incidents, audit and review.	External Notification Record (SG08), Action Log (SG09), Annual Assurance & Learning Review (SG10).

Detailed Handbook documents may be combined where this improves usability and avoids duplication. The current controlled Handbook register will identify each component, owner, version, effective date and review date.

Appendix B – Principal Legal and Regulatory References

- Children Act 1989 and Children Act 2004.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026.
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012.
- Police Act 1997 and current Disclosure and Barring Service guidance.
- Sexual Offences Act 2003.
- Care Act 2014 and Care and Support statutory guidance.
- Mental Capacity Act 2005.
- Equality Act 2010 and Human Rights Act 1998.
- UK GDPR and Data Protection Act 2018, as amended.
- Counter-Terrorism and Security Act 2015 and applicable Prevent guidance.
- Online Safety Act 2023 where applicable.
- Current Charity Commission safeguarding and serious incident reporting guidance.
- Current Nottinghamshire child and adult safeguarding multi-agency procedures.
- Relevant RFU and CPSU safeguarding guidance.

Current external referral routes and contact details are maintained in SGR05 - Safeguarding Contacts & Referral Directory and Tab 1 (Directory) of the NRCF_Safeguarding_Master_Register.xlsx rather than being reproduced in this Policy.

Appendix C – Document Approval and Revision History

Document title	NRCF Safeguarding Policy 2026
Document status	Board-approved governing policy
Safeguarding framework	Part 1 of the NRCF Safeguarding Handbook
Policy owner	Designated Safeguarding Lead
Governance owner	Board of Trustees
Safeguarding governance oversight	Safeguarding Lead Trustee
Board approval date	[insert date]
Effective date	1 September 2026

Approved by the Board of Trustees of Newark Rugby Community Foundation.

Chair / authorised signatory: _____

Date: _____

Next review date: _____

Revision History

Version	Date	Summary of change	Approved / authorised by
1.0	[insert]	Initial adoption of NRCF's independent safeguarding policy and framework, effective from 1 September 2026.	Board of Trustees

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