

## Policy Objective

Safeguarding is a governance priority for Blue Marine Foundation, and we are committed to protecting children, young people, adults at risk, our staff and volunteers, third parties including partner communities and the marine and coastal environments we work in. The purpose of this safeguarding policy is to provide information about the safeguarding policies, procedures and practices that are in place at Blue Marine.

This policy does not form part of your contract and Blue Marine reserves the right to amend or remove this policy at any point in time.

## Scope

- 1.1 This policy applies to all Blue Marine trustees and employees at all levels of the charity, as well as consultants, contractors, agency workers and volunteers. It is everyone's responsibility to promote the welfare of individuals engaged at Blue Marine and to keep them safe.
- 1.2 This policy extends to all activities in the UK and overseas projects, including research, conservation, education, and field operations (on-shore, off-shore and at sea) or any other activity.
- 1.3 This policy extends to reflect our responsibility towards partner organisations and local communities where we co-deliver programmes.
- 1.4 This policy is particularly important in any regulated activity/work that Blue Marine undertakes with children and/or adults at risk. Blue Marine complies with all the legal obligations placed upon it by the Safeguarding Vulnerable Groups Act (2006) (England and Wales).

## Equality statement

- 2.1 Blue Marine is committed to anti-discrimination practice and upholds the principles of the Equality Act 2010 so that every vulnerable person in our charity has the same protection regardless of the age, disability, gender, racial heritage, religious belief, sexual orientation or identity.
- 2.2 We recognise that not only do our employees and staff come from different and diverse backgrounds, but the nature of our work leads us to working with communities all around the world. When we apply this policy, we will always aim to appreciate this diversity and adapt our processes accordingly, to ensure fair and equitable treatment to all.

## What is safeguarding?

- 3.1 Safeguarding can be defined as the protection of vulnerable individuals from abuse, neglect or any form of harm. At Blue Marine, we take our responsibilities seriously and endeavour to make sure our services are carried out with the welfare of the following groups in mind:

### 3.1.1 **Safeguarding (Children)**

Safeguarding the welfare of children (anyone under 18, including unborn children) means our commitment to protection from maltreatment (including online), preventing impairment of



health or development, ensuring safe and effective care, and taking action to enable best outcomes during any contact with our charity. Blue Marine's work with children is usually in collaboration with an education centre who retains the primary safeguarding responsibilities. However, Blue Marine adopts guidance from the 'Keeping Children Safe in Education 2024' DFE report.

### 3.1.2 **Safeguarding (Adults at risk, or over 18 years of age)**

We commit to safeguarding any adult at risk, or adult requiring support, to live in safety, free from abuse and neglect, and to take proportionate action that promotes the person's wellbeing, wishes and autonomy when engaging with our charity.

### 3.1.3 **Staff and volunteer safety**

We commit to ensuring the health, safety and welfare at work of all employees. We extend equivalent responsible practices to volunteers and third parties.

### 3.1.4 **Protection from Sexual Exploitation, Abuse and Harassment.**

We adopt core values, policies and processes to prevent and respond to any potential or actual sexual exploitation and/or abuse by our own staff, volunteers and, where reasonably possible, third parties.

### 3.1.5 **Environmental safeguarding**

As far as reasonably practicable, we assess and manage environmental and social risks and impacts of our overseas projects in line with good international practice, including the International Finance Corporation (IFC) Performance Standards. The IFCPS are a set of internationally recognised environmental and social standards developed to outline good practice for identifying, managing and reducing environmental and social risks in projects, particularly those operating in emerging and developing countries. Many NGOs and conservation organisation reference these as a global benchmark for responsible practice. We consider risk management, pollution prevention, community health & safety, biodiversity and living natural resources, indigenous peoples and cultural heritage.

3.2 Abuse or harm can come from a single incident or something that occurs over a long period of time. It can also take many forms including, but not limited to:

- financial or material abuse
- physical abuse
- mental abuse
- neglect and failures to act
- sexual abuse
- threats of abuse or harm
- controlling or intimidating conduct
- self-neglect
- domestic abuse
- poor procedures and practices

- modern slavery

Abuse or harm can come from a variety of sources, including employees, volunteers, third parties, local communities, relatives, neighbours or providers of services.

- 3.3 Charity commission guidance is issued by the key charity regulator for England & Wales. It states that whether working online or in person, we must take reasonable steps to protect individuals who encounter Blue Marine through our work.
- 3.4 At Blue Marine we ensure any safeguarding steps we take are ‘reasonable’ by aligning with established sector practices and norms either directly, or if international, through a local partner to ensure we meet all legal requirements and apply best practice with our procedures.

#### Legal and regulatory framework (UK)

- 4.1 The main legislation underpinning Blue Marine’s safeguarding policy and procedures are:
- **Children:** Section 11 Guidance of the Working Together to Safeguard Children 2023
  - **Adults:** Care Act 2014 and Care and Support Statutory Guidance
  - **Vetting & barring:** Safeguarding Vulnerable Groups Act 2006 and DBS rules on regulated activity with children/adults.
  - **Health & Safety:** Health and Safety at Work etc. Act 1974
  - **Charity governance:** Charity Commission guidance—trustees must prioritise safeguarding, operating overseas safely, and report incidents to relevant agencies and regulators.
  - **Whistleblowing:** Public Interest Disclosure Act 1998—protections for workers raising public interest concerns (including safeguarding and environmental damage).
  - Inshore Fisheries and Conservation Authorities (**IFCA**)
  - World Bank Group Environment Health and Safety Guidelines
  - UK Marine Strategy goals for Good Environmental Status (**GES**)
  - Best practice identified by the UK Parliament’s Environmental Audit Committee
- 4.2 Please note: Scotland, Wales and Northern Ireland have aligned but separate arrangements; project managers must follow local statutory guidance on where the work is being delivered. This is particularly relevant where projects may be outside of the UK.

#### Our Designated Safeguarding Team

- 5.1 Our Board of trustees work together to review any serious incidents should they occur and support any due process or reporting for safeguarding purposes.
- **Designated Trustee:** Charles Nelson.
  - **CEO:** Clare Brook
  - **Designated Safeguarding Lead (DSL):** Collette Thurston, Head of People and Culture
  - **Deputy Safeguarding Lead:** Lynne Smith, Director of Governance, Finance and Operations
  - **Deputy Safeguarding Support:** Barny Hobbs (Solent Oyster Restoration Officer, Solent); Hamish Mackay (Events and Sponsorship Manager, international projects)

- **Supporting contacts:** Matthew Peckett, Head of Operations; IT Champion.

## Roles and responsibilities

6.1 The role of the designated safeguarding team for Blue Marine is to:

- Ensure our safeguarding strategy includes adequate reflection and consideration of risks.
- Review and develop safeguarding policies and procedures, support implementation and review regularly.
- Be assured safeguarding requirements meet the legal minimum and wider sector expectations.
- Ensuring safeguarding risks are reflected in our approach to managing risk
- Building safeguarding into line management arrangements and advise appropriate resourcing and deliver induction, training and awareness
- Supporting our DSL and provide information to all stakeholders
- Model and nurture a participatory ethos and culture
- Maintain links with local authorities and other agencies
- Ensure project and overseas risk assessments and work are aligned to the appropriate standards
- Manage safeguarding concerns, allegations or incidents reported to the charity. Obtaining information from staff, volunteers, children, etc who have protection concerns and to record this information.
- Access information quickly and carefully and ask for further information as appropriate
- Consult with the appropriate protection agencies, such as the local social services, authority, to clarify any doubts or worries.
- The designated safeguarding person should manage referrals to the appropriate safeguarding agencies without delay.

## Safer people and safer culture

7.1 Due to the nature of our work, we are sensitive to ensuring our safeguarding procedures are fully integrated into our culture and practices. We aim to be consistent, confident and transparent in our approach.

7.2 Blue Marine's work profile includes educational settings and the support and delivery of environmental projects whilst working with local communities. Therefore, we commit to:

- tailoring our work to maximise the impact of our outcomes and minimise disruption
- engaging all stakeholders at the earliest opportunity to ensure all due diligence is completed
- ensuring clear communication is maintained
- being sensitive to community needs and make adaptations when necessary
- being considerate of religious holidays/festivals when working
- being considerate of school working hours or other commitments
- ensuring that appropriate measures are taken into consideration to safeguard the groups and environment that we work with.

Project specific commitments:

- Ensuring each project has an established environmental and social management plan proportionate to risk, that includes biodiversity and community health and safety.
- Monitoring & impact reporting (including adaptive management) to support relevant funder safeguards.
- Where possible, supporting the establishment of accessible reporting channels for local communities, including anonymous options.

## Recruitment and Selection

- 8.1 Blue Marine applies structured recruitment and induction practices consistent with Charity Commission guidance.
- 8.2 Regulated activity refers to specific work with children or adults at risk that a person on the UK Disclosure and Barring Service (DBS) barred lists must not carry out. Where a UK vacancy at Blue Marine involves regulated activity, this will be clearly stated on the job advert alongside the basis of that work. We use role-appropriate Disclosure and Barring Service (DBS) checks, or Disclosure Scotland checks in Scotland, accordingly, take up references and verify identity and qualifications; we assess conduct risks for field roles and exclude applicants who pose safeguarding or environmental risks.

## Training and conduct

- 9.1 Blue Marine is committed to the provision of safeguarding training for all members of the charity to the appropriate level of detail for their roles. This includes our Code of Conduct, policies and guidelines associated with upholding the integrity of our safeguarding measures. Please refer to our wider supporting safeguarding policies and guidance:
- Anti-bullying and Anti-Harassment policy
  - Whistleblowing policy
  - Code of Conduct
  - Disciplinary and grievance procedures
  - IT and Artificial Intelligence (AI) policy
  - Modern slavery statement
  - EDI statement
  - Procurement policy
  - Health and safety policy
  - Safety at Sea policy
- 9.2 The Trustees, DSL and safeguarding team will update their safeguarding training every three years or after legislative change, whichever occurs first.
- 9.3 All third parties must sign and comply with the Code of Conduct and associated policies to uphold Blue Marine's safe working measures and practices.



## Safer programmes and partners (UK and overseas)

10.1 Project managers should discuss with the DSL any amended procedure reporting based on their locality. The area where the project is located will determine the safeguarding line of reports for that area, with our core policy supporting local procedures. The local procedure guidance should be held as an appendix to our core procedure guidelines.

## Risk assessments and controls

11.1 When working on a project that is outside of London, where the DSL is based and our other UK based offices, where this core policy is directed, project managers will be advised to complete and maintain:

- Safeguarding risk assessments
- Health & Safety risk assessments
- Environmental and Social impact assessments

## Biodiversity and ecosystem protection

12.1 Blue Marine supports the recovery of marine habitats and works closely with local communities to ensure it avoids or minimises any adverse impact its work may have on critical habitats and protected species. We implement monitoring and adaptive management consistent with IFC PS6 and UK Marine Strategy goals for Good Environmental Status (GES).

12.2 We adopt best practice identified by the UK Parliament's Environmental Audit Committee. For example, avoiding damaging practices in MPAs through partner due diligence and contractual controls.

## Indigenous Peoples and culture

13.1 Where international work involves indigenous peoples or distinct cultural groups, we ensure engagement is culturally appropriate and respectful of customary rights and cultural heritage; avoiding activities that would adversely affect sacred or culturally significant marine sites.

## Partner and procurement standards

14.1 Wherever possible, we ensure safeguarding and environmental safeguarding standards are supported through due diligence with our contracts with partners and suppliers to commit to including safeguarding and environmental clauses, incident reporting obligations, whistleblowing channels, and performance monitoring. Please see our Procurement policy.

## Online safeguarding

15.1 Blue Marine applies the Charity Commission's approach to online risks across content (what people see), contact (who they interact with) and conduct (how people behave). These risks are considered for all digital activity, including remote online learning, remote engagement, social media interactions and digital platforms. Please see our IT security policy and AI policy.

## Reporting concerns and incident management

16.1 Blue Marine will treat all complaints, allegations or suspicions of abuse with the utmost seriousness. Our procedure guides are available to ensure awareness of the warning signs of abuse and detail the correct reporting procedure to follow if anyone suspects abuse is, or has, taken place. However, below is a summary of who to raise the concern with and how:

### **Immediate safety first**

If life or safety is at risk (child or adult), call 999 (UK) or local emergency services overseas.

### **Internal reporting**

- Concerns, including online concerns, can be raised to the **DSL, safeguarding team** or to **project managers** in person, by phone or in writing.
- The **DSL** will record, assess within 24 hours, and refer to **statutory agencies** (children's social care, adult safeguarding), and/or **police** where required, in line with local procedures.
- Sexual harassment allegations should be raised to the **DSL**.
- Environmental concerns should be reported to: **Deputy DSL** or the **Events and Sponsorship Manager**.

### **Whistleblowing**

Workers have legal protection when making protected disclosures (e.g., crimes, breach of legal obligations, danger to health/safety, damage to the environment). Volunteers and trustees may not have statutory protection under the Public Interest Disclosure Act 1998 (PIDA) but may also use our internal Whistleblowing policy; we will treat all concerns seriously and protect individuals from detriment.

### **Regulatory and donor notifications**

Trustees will report serious incidents to the Charity Commission and relevant authorities, including DBS referrals when legal conditions are met.

16.2 In the absence of the **designated safeguarding lead**, matters should be brought to the attention of the **deputy safeguarding lead** who will act under delegated authority. Blue Marine ensures that the deputy is trained to the same standard as the **DSL**. Suspicions will not be discussed with anyone other than those nominated above. If you would like to contact us, you can at:

Blue Marine Safeguarding Team  
c/o Head of People and Culture  
South Building  
Somerset House  
London  
WC2R 1LA

## Data handling, cross border data-transfers and confidentiality

17.1 We will handle safeguarding records confidentially, share information lawfully and proportionately with authorities and partners on a need-to-know basis, and preserve evidence and records appropriately for the minimum statutory periods (following statutory guidance and best practice GDPR). These records support transparency and accountability under UK GDPR, as required by ICO guidance, including international transfers. Please refer to our Privacy notice for more information.

### 17.2 Cross border data-transfers

We actively support projects across multiple countries and there may be instances where there is a need to transfer or provide access to personal data outside the UK. Blue Marine ensures that if an international data transfer is necessary, it receives a level of protection equivalent to that provided by UK GDPR standards to safeguard all individuals connected to our work.

17.3 In safeguarding contexts, international data transfers may occur when:

- responding to concerns involving overseas staff or communities,
- sharing information with overseas authorities where legally required,
- coordinating with international safeguarding experts or investigators.

In exceptional cases, it may be due to:

- vital interests, such as protecting life,
- important public interest grounds.

## Policy review, monitoring and assurance

18.1 The **Head of People and Culture** will review this policy annually to include:

- Annual safeguarding audit
- Annual environmental safeguarding audit
- Board review of any serious incident logs, lessons learned, updates to policy and risk registers accordingly.

18.2 Interim review will also follow on from any incidences, to ensure the policy's effectiveness and where necessary additional practical guidelines will be prepared and implemented.

