



Safeguarding Policy

Purpose of Policy

This policy sets out the Royal Household's approach to safeguarding and promoting the welfare of children, young people and adults at risk. Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Each year thousands of individuals, including many children and vulnerable adults visit the Official Residences as official guests, or as a part of an organised party or a family group, equally some members of staff, may fall under the definition of vulnerable adults. Whilst the primary responsibility for children's welfare rests with the responsible and/or supervising adult, the Royal Household wishes to ensure a safe and healthy environment for all children and adults.

The Royal Household is committed to promptly deal with any concerns about the welfare of a child or vulnerable adult arising including any alleged abuse or harassment by a member of the Royal Household staff.

This policy is based on the legislative framework across the United Kingdom, it must be noted that, although there are legislative differences between these nations the overall aims remain consistent with keeping children and adults at risk of harm safe.

This policy follows the 4Rs of Protection

- Recognise any concerns for a child or vulnerable adult which may be welfare/wellbeing.
- Respond appropriately to any concerns about a child or vulnerable adult within the Royal Household policy and procedures
- Refer – this will be the responsibility of the Safeguarding Officer following discussion.
- Record – using the [Safeguarding Report Form](#) (Appendix 2)

Scope of Policy

This policy applies to all staff, casual workers, volunteers, secondees, and anyone working on behalf of the Royal Household, including the Chapels Royal (referred to in this document as 'staff') working in the United Kingdom.

All staff across the Royal Household are responsible for following the procedures set out in this policy and have a responsibility to promote the welfare and wellbeing of all children and adults at risk, working at or visiting the Occupied Royal Palaces.

Policy Statement

The Royal Household believes that a child, young person (noted in this policy as children) or adult at risk of harm should never experience abuse of any kind and are committed to work in a way that protects them in line with legislation and government guidance in all areas of the United Kingdom. This is both an individual and collective responsibility, regardless of department, role or level of seniority, across the Royal Household.

We are committed to providing a healthy, positive and safe environment and ensuring that we can confidently and competently fulfil our responsibilities and obligations.

The Royal Household recognises that the welfare of children and adults at risk of harm is paramount, all, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of abuse for example emotional, physical, sexual, neglect or bullying while on Royal Household premises.

Roles and Responsibilities

All staff are responsible for following the procedures set out in this policy when responding to any concerns or incidents when working with children and adults. There are a number of committees that have specific responsibilities in relation to the protection and safety of children, young people and adults.

The Lord Chamberlain's Committee (LCC) have overall responsibility for the safeguarding of children and 'Adults at Risk' in the Royal Household. The LCC are responsible for the Royal Household Risk Register and for approving Household policy.

The Risk Committee. Reports to the LCC and is responsible for overseeing the mitigation and management of all risk, as outlined in Royal Household Risk Registers, and for identifying emerging risks.

Safeguarding Committee provides a forum for feedback from involved senior managers and Safeguarding Officers on the impact and effectiveness of the Safeguarding policy and procedures, with a view to reducing risk, achieving proportionality, ensuring coordination (across all parts of the organisation) and improving mutual understanding.

The Safeguarding Sponsor

The role of the Safeguarding Sponsor is to:

- Have a working knowledge of the relevant legislation and national guidance in protecting children, young people and vulnerable adults.
- Complete the relevant safeguarding training as soon as appointment to the role and every two years thereafter.
- Liaise with the Safeguarding Officers over safeguarding matters.
- Provide support to Safeguarding Officers when cases that pose a significant risk, or involve a Safeguarding Officer, are escalated.
- Conduct regular reviews of policy and procedures to ensure these reflect any changes in legislation.
- Ensure policies and procedures are easily accessible by staff and members of the public visiting Royal Household sites.

- Ensure each site has an assigned Safeguarding Officer with the relevant training.
- Ensure staff training is sufficient and that appointed Safeguarding Officers have completed formal training at the appropriate level.
- Manage the storage of safeguarding data and ensure records are up to date and stored in line with GDPR legislation.
- Ensure the Royal Household conducts the appropriate statutory checks when recruiting individuals who will work with children.

Safeguarding Officers have further responsibilities and will provide a source of support and advice for staff.

The role of the Safeguarding Officers is to:

- Have a working knowledge of the relevant legislation and national guidance in protecting children, young people and vulnerable adults.
- Complete the relevant safeguarding training as soon as appointment to the role and every two years thereafter.
- To act as the first point of contact, source of support, advice and expertise for all staff about the safety and welfare of a child or adult.
- Challenge the behaviour of any member of staff or visitor to Royal Household sites who is acting in contradiction with this policy, escalating the matter to the appropriate body, including the police, the local authority designated officer or the Safeguarding Sponsor, as required.
- Manage all referrals, refer all cases of suspected abuse to the appropriate agency either Social Care and/or Police and ensure that appropriate information is available, confirmed in writing under confidential cover as quickly as possible.
- Be familiar with Local Children partnerships (England), Adult Protection Committee (APC) and Child Protection Committees (Scotland) (CPC) procedures
- To ensure that The Royal Household policy and procedure to protect children and adults are implemented and followed and that all staff know where they can find these
- Liaise with appropriate local agencies for support and advice and know where to find local contacts
- Advise and organise training of all staff about their responsibilities to protect and keep safe children and adults
- To collect monitoring data on all welfare, wellbeing and protection activities across the Royal Household and evaluate their effectiveness.
- Support the Safeguarding Sponsor on developing, reviewing, updating and disseminating the Royal Household Safeguarding policy and procedures and monitoring its implementation
- Signpost support options for colleagues involved in any incident, unless an allegation has been made against the colleague, in which case communication will come from the Safeguarding Sponsor.
- Ensure any external users organising activities at Royal Household sites are aware of, and compliant with, the Royal Household's safeguarding policy and procedures.
- Be familiar with the Government's PREVENT programme which aims to tackle the ideological causes of terrorism, intervene early to support people susceptible to terrorism and enable those who have already engaged in terrorism to disengage and rehabilitate.
- Responsible for and trained on Safeguarding Risk Assessments.

The Safeguarding Officers for each site are listed on [Coronet](#). If the Safeguarding Officers at a particular site are not available, those from another site should be contacted.

For external visitors or guests who need to report a safeguarding incident, please call the Switchboard on 020 7930 4832 and ask for the safeguarding officer and state the residence you are visiting.

Line Managers

It is the role of individual managers to ensure their team has completed the relevant safeguarding training.

Supervising Adult

A supervising adult assumes in loco parentis, for example: a teacher of a school group or the mentor of a work experience pupil under the age of 16. All children under the age of 12 years on Royal Household premises must be accompanied or supervised by an adult.

Code of Conduct

The code of conduct is intended as a guide and minimum standard for all members of staff working on behalf of the Royal Household.

When working with children or adults at risk of harm who are visiting members of the public, or individuals living on-site all staff must:

- operate within this policy
- ensure the supervising adult (i.e. someone from the school, family etc.) accompanies and/supervises any child under the age of 12 and is therefore meeting their responsibility for ensuring the safety of those in their care;
- work in an open environment (well lit, avoiding private or unobserved situations);
- treat all children and adults at risk of harm equally and with respect;
- respect the child or adult at risk of harm's right to personal privacy;
- encourage the child or adult at risk of harm to be comfortable enough to point out attitudes or behaviour they do not like;
- maintain an appropriate distance from children and adults at risk of harm
- seek agreement from the child or adult at risk before any physical contact;
- be an excellent role model – this includes not smoking, or using inappropriate language while in the company of children or adults at risk of harm;
- obtain written parental consent prior to any photographs, videoing or recording;
- approach any child or adult at risk apparently in distress and ask if you can help;
- follow the 'safe practise' guidance for physical restraint and contact as set out in staff training

Unacceptable Practices

The following should never be sanctioned:

- spending excessive amounts of time with any child or adult at risk away from others;
- allowing children or adults at risk of harm to travel on their own with you in a vehicle;
- engaging in rough, physical or sexually provocative games, including horseplay;
- making suggestive/derogatory remarks or gestures in front of children or adults at risk of harm;
- entering the lavatories with a child or adult at risk unless the supervising adult is present or gives permission;
- allowing allegations made by a child or adult at risk to go unchallenged, unrecorded or not acted upon;
- physically restraining a child or adult at risk unless the restraint is to:
 - prevent the physical injury of the child or adult at risk or yourself/member of staff/ member of public
 - prevent damage to property;
 - prevent or stop the commission of a criminal offence.

Social Networking

No member of staff will communicate or accept or send request to 'friend' or 'follow' on any social media platform from any child, be they a resident of on the Royal Estate, or a visiting member of the public. This includes sharing or seeking to share personal or work contact details e.g. email, phone number etc. If there are any areas of doubt regarding misuse of social media please refer to the Royal Household's [Social Media Policy](#).

Disabled visitors at Official Residences of The King

The Royal Household welcomes visitors and guests with disabilities and it is important that these visitors are given assistance appropriate to their needs. However, for the protection of all parties, staff must not provide mobility assistance unless they have received the appropriate training. Assistance should be provided by the accompanying adult. Staff may provide appropriate assistance to the accompanying adults but, unless nominated and trained to do so, must not take responsibility for pushing wheelchairs or guiding other mobility devices. The exception to this is in an emergency situation.

Alcohol at Receptions and Events

Under the Licensing Act 2003 and the Licensing (Scotland) Act 2005, anyone under the age of 18 is not allowed to purchase or consume alcohol in a place other than a private house. In most cases under 18s do not attend events and receptions where alcohol is served. However, when they are in attendance, staff must be aware of the Royal Household's legal obligations and ensure that guests under the age of 18 are not offered alcohol. The current practice adopted by the Masters department is to include an under 18s 'tick box' when booking guests for an event. Where under 18s will be attending, steps are taken to identify the young people to members of staff e.g. by a coloured dot on their name badge. Members of staff are briefed on how many young people are attending, how to identify them and what appropriate refreshments to offer them.

Photography of Children or Adults at Risk of Harm

The Royal Household and Royal Collection Trust will not use photographs or videos of children or adults at risk of harm for official purposes without obtaining permission from a supervising adult. This applies to all photographs that may be used in any form of publication or broadcast, including social media.

In the case of school groups, parental consent will be required and this should be requested from the school in advance of the activity. If this is not possible, written permission should be obtained on the day from the school.

In the case of family events, permission in writing from the children's parents/carers should be obtained on the day. All saved data and information taken from parent/carers for this purpose is GDPR compliant.

The Royal Household is conscious that it is not always possible to prevent photography given the high number of visitors to its sites. Parents, teachers and guardians should therefore be aware of those around them and may use the resource in Appendix 1, should they find it useful.

Where photographs of visitors or state rooms etc. are required and it is not feasible to obtain consent because of the number of people involved, or where people are too distant to be recognised, a notice should be prominently displayed in advance of and during the photography informing visitors that photographs will be taken in that area between specified times.

If photographs of children or adults at risk of harm are to be used in printed materials, provided to the press or included on websites etc., any information which could be used to identify or trace the children or adults at risk of harm should be withheld (e.g. names of individuals, names of schools, groups or institutions).

Crests, badges etc. on uniforms which feature the name of a school should not be shown, or the school name should be digitally obscured where possible. Where providing the name of an individual, school, group etc. is necessary (e.g. when celebrating an achievement, competition winners etc.) written permission should be obtained from parents or supervising adults.

Any information which could be used to identify or trace individuals should not be given to any enquirers.

Volunteers, Workers, Freelances and Contractors

The Royal Household undertakes appropriate background checks for its staff, volunteers and freelance staff, who work directly and/or unsupervised with children. Contractors and external agencies must produce their own valid DBS/PVG membership certificates. DBS and PVG checks are carried out on all relevant staff and this is recorded on iTrent.

Volunteers are required to follow Royal Household policies and codes of conduct, as are casual workers, freelance staff and contractors on the wider Royal Household estate. Heads of Department are responsible for ensuring that their staff have completed the relevant training and this policy is consistently applied and that all those who come into contact with children or adults at risk of harm during the course of their work are aware of, and comply with, the procedures outlined.

External organisations visiting Royal Household sites who undertake activities with children or vulnerable adults must also adhere to this policy. It is the event organisers responsibility to seek to obtain the external organisations own safeguarding policy and to make the site specific safeguarding officer aware of an event taking place.

Apprenticeships, Work Experience and Student Placements

Guidelines for apprenticeships, work experience and student placements are found in the [Royal Household Work Opportunity Policy](#). All applications should be made to the Learning & Development team. It should be noted that special arrangements are required when arranging work experience for students under the age of 18, (e.g. risk assessments must be undertaken and a DBS/PVG cleared supervisor made responsible for the child for the duration of the placement).

Training

All Royal Household staff must have access to the Safeguarding and Child/Adult Protection Policy, available on Coronet and the Royal Collection Trust website where it is regularly reviewed and updated.

Staff who work with members of the public, must have appropriate training on the Code of Conduct upon induction and be familiar with the Safeguarding and Child/Adult Protection policy and procedures. This must be maintained throughout their employment through the completion of online training sessions on Aster Learn at least every three years. It is the responsibility of individuals and their line managers to ensure this is completed.

Managers must ensure training is completed by any member of their team who is likely to come into contact with members of the public. Training is provided to managers in a separate e-learning module on Aster Learn, which must also be completed every three years.

Household staff who are designated Safeguarding Officers are required to undergo formal training at the appropriate recognised level every two years.

Staff who may have contact with children or adults at risk of harm must be kept updated on any changes in policy, procedures and guidelines via Coronet and their line manager.

Procedure

These procedures apply to all staff working within the Royal Household and the Occupied Royal Palaces, as well as the Chapels Royal. All staff should have access to the Safeguarding Policy via the Monarchy website, Royal Collection Trust website and Coronet. Hard copies are also available on request via HR.

Incident Reporting Process

The following procedures must be followed by all staff within the Royal Household for the reporting of any safeguarding/protection incident or concern or incident involving a visiting member of the public, a guest or another member of staff. The Safeguarding Officer must be notified as soon as is reasonably possible of any identified concern, all concerns must be recorded in writing.

Responding to concerns that a child or adult at risk has been harmed or is at risk of harm by a member of the public.

All staff are responsible for raising concerns about the behaviour, actions or attitude of a member of the public towards a child or vulnerable adult.

If a member of staff witnesses an incident or potential criminal act that requires immediate action or causes them concern they must, where appropriate and safe to do so, intervene to mitigate the risk and alert their manager and, if necessary, the police.

Once any immediate action has been taken, or where concerns have been raised, the steps set out below should be followed:

1. Any concerns should be raised to a Safeguarding Officer without delay. If the Safeguarding Officer at the appropriate site are not available, a Safeguarding Officer from another site should be contacted. The Safeguarding Officer will then carry out initial fact-finding and ensure an accurate record has been made and stored securely and appropriately according to the procedures above. Where necessary the member of staff who witnesses or suspects an incident should also alert their manager and, if appropriate, the police.
2. The Safeguarding Officer will report the matter to the relevant agencies and, where it appears that a crime may have been committed, to the police without delay. In some cases, the police may need to interview staff as witnesses and the Police will also lead on potentially criminal matters. In cases that pose a significant risk the Safeguarding Officer may escalate the issue to the Safeguarding Sponsor.
3. The Safeguarding Officer will record the incident on the EVA incident reporting system.

[Allegations Against Royal Household Staff](#)

All staff are responsible for raising concerns about colleagues; these concerns could be about: behaviour or actions that has harmed a child or vulnerable adult, behaviour that indicates they may pose a risk of harm towards a child or vulnerable adult or possibly committed a criminal offence through inappropriate use of restraint or accessing inappropriate online data.

If a member of staff witnesses a safeguarding incident or potential criminal act that requires immediate action they should, where appropriate and safe to do so, intervene to mitigate the risk and alert their manager and, if necessary, the police. The member of staff should then follow the steps set out below.

1. Any concerns should be raised immediately with a Safeguarding Officer who will escalate this to the Safeguarding Sponsor. If the concern relates to a Safeguarding Officer it should be raised to the Safeguarding Sponsor directly. The Safeguarding Officer or Safeguarding Sponsor will ensure that appropriate records are made and stored, ensuring they maintain a high level of confidentiality.
2. Initial fact-finding should be carried out sensitively by the Safeguarding Sponsor. This will involve checking files and recent records and clarifying basic facts with key staff. If the Safeguarding Sponsor concludes that no further action is necessary then this decision must be recorded.
3. The Safeguarding Sponsor may seek advice from the relevant Royal Household committees and local authorities to assess whether the incident warrants an allegation against the member of staff. This will be done without disclosing confidential facts of the case. They will consider: Did the alleged incident potentially cause harm to a child or adult at risk? Does the alleged incident potentially constitute a criminal offence? Does the alleged incident suggest that the member of staff is potentially unsuitable to work with children and adults at risk? Unless advised otherwise, the Safeguarding Sponsor will inform the individual under investigation and their line manager if an allegation is made.

4. The Safeguarding Sponsor, in liaison with local authorities, the Director of HR and the individual under investigation's line manager, will decide what next steps to take. These may include: criminal proceedings, child protection procedures, referring to the Local Authority/Police, following disciplinary procedures, training needs, a combination of these measures or no further action. Any internal disciplinary measures must not interfere with any potential police investigations and may be delayed until these are concluded. In this instance, the accused individual may be suspended on full pay for the period.

If a staff member is dismissed because of abuse concerns, the Royal Household has a duty to formally notify the Disclosure & Barring Service and/or Disclosure Scotland. This also applies if a member of staff resigns as a result of safeguarding concerns being raised. The referral process is fully detailed on the DBS/DS websites.

To protect both the accuser and the accused, the matter should only be disclosed to those who need to know about it. The investigation should also be completed as quickly as possible consistent with its effective conduct. This will be done with appropriate care for the employee or guest or visitor

If it is established that the allegations were unfounded or malicious, the Safeguarding Sponsor should:

- Make it clear to those involved that the accused has been exonerated;
- Consider whether counselling for the accused and/or accuser is appropriate;
- Consider further steps to clear the accused
- Consider a formal disciplinary investigation into the unfounded or malicious report

All safeguarding cases will be reviewed on completion to ensure the policy and procedures were used effectively.

Recording a Concern

All staff should know how to keep accurate, appropriate written records which should distinguish between fact and opinion. The keeping of accurate and prompt recording is fundamental and should be completed as soon as reasonably possible following an incident using the [Safeguarding Report Form](#) (Appendix 2).

The Safeguarding Officer has responsibility to ensure all concerns raised are recorded, monitored and secured. Electronic records, including emails, will be saved within a secure folder on the X drive. Access to these records will be strictly limited to the Safeguarding Committee.

The Royal Household complies with the principles of the Data Protection Act (2018) and Human Rights Act (1998) in the way it collects, holds and disposes of personal information. It should be noted that, legislation does not prevent, or limit, the sharing of information for the purposes of keeping children safe. The NSPCC whistleblowing helpline is available for individuals who do not feel able to raise concerns regarding child protection failures internally. Individuals can call: 0800 800 5000 or email: help@nspcc.org.uk.

Guidelines for school groups visiting the Official Residences

The Royal Household complies with the guidelines set by the Department for Education in England (DfE) (Health and Safety of Pupils in Educational Visits) and the Scottish Government (Health and Safety on Educational Excursions) on adult to pupil ratios for school groups during off-site visits. Further details can be found [here](#).

Glossary of terms

Child

For the purposes of this policy the definition of a 'child' or 'young person' is anyone aged under 18 years of age as supported by the Children Act 1989 (England) and Children and Young Person Act (2014) (Scotland). Where a young person in Scotland aged 16-18 requires protection it must be noted that the Adult Support and Protection (Scotland) Act 2007 legislation may apply.

Child Abuse

Child abuse and neglect is the maltreatment of a child. An individual may abuse or neglect a child or adult at risk of harm directly, or may be responsible for abuse or neglect because they fail to prevent significant harm by another person. 'Significant Harm' is circumstances where a child or young person's basic needs are not being met and the child is, or will be, at risk through avoidable acts of commission or omission on the part of their parent(s), sibling(s) or other relative(s) or a carer (i.e. the person(s) while not a parent who has actual custody of, charge of, or control over a child).

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race, disability or ability, sexual orientation, religion or socio-economic status.

Some of the main types of abuse are physical, emotional, sexual, neglect and bullying/cyber-bullying.

Safeguarding/Child and Adult Protection

It must be noted throughout this policy that there are some differences in terminology when referring to the protection of children, young people and vulnerable adults between England and Wales, and Scotland. In England and Wales, the term Safeguarding is used as the action taken to promote the welfare of children and adults and means protecting children and vulnerable adults from abuse and maltreatment.

In Scotland, the terms child protection and adult protection/adults at risk of harm are used. Child Protection means protecting a child from child abuse or neglect. Abuse or neglect need not have taken place; it is sufficient for a risk assessment to have identified a likelihood or risk of significant harm from abuse or neglect. Adults at risk of harm or neglect are defined in legislation as those aged 16 years and over who: are unable to safeguard their own wellbeing, property, rights or other interests. For avoidance of doubt, the term Safeguarding in the context of this policy, is to be read as to explicitly refer, include and reflect the Scottish Government's Child Protection legislation and guidance surrounding Child Protection and adult protection or adults at risk of harm.

Adult at risk of harm

In England and Wales an adult at risk is any person who is:

- aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support; or
- where someone is over 18 but still receiving children's services and a safeguarding issue is raised, the matter should be dealt with as a matter of course by the adult safeguarding team

In Scotland an adult at risk of harm is a person (aged 16 years or over) who is:

- unable to safeguard their own well-being, property, rights or other interests
- at risk of harm
- more vulnerable because they are affected by disability, mental disorder, illness or physical or mental infirmity.

This policy will be reviewed annually, as a minimum, or sooner if there is a change to the relevant legislation or guidance. All changes will be approved by the HR Director and the Royal Household Risk Committee.

Other sources

The policy should be read in conjunction with:

- The Royal Household [Health and Safety Policy](#)
- The Royal Household [Disclosure Policy](#)
- [The Safeguarding Policy of the Church of England](#)
- Deans and Canons of Windsor Safeguarding Policy
- [City of London School Safeguarding Policy](#)
- [The Policy for Safeguarding in the Diocese of London](#)
- The Royal Household [Work Opportunity Policy](#)
- RCT Missing Persons Procedure (site-specific)
- The Royal Household Social Media Policy
- [Children's Act 2004](#)
- [Working Together to Safeguard Children](#)
- [PREVENT](#)

Version Control & Governance

Owner	HR Director
Author	Safeguarding Sponsor
Approver	Safeguarding Committee
Version	V1.2
Review date (<i>most recent date policy was reviewed</i>)	November 2025
Summary of changes made	New template utilised.

Resources



Appendix 2

Safeguarding Report Form

When completing this form, either record in detail what you have witnessed, or if recording a report from a member of the public, write exactly what the individual has said in their own words and your concerns/observations. Do not ask leading questions.

Submit this form to the relevant **Safeguarding Officer** at your site (details can be found on [Coronet](#)).

Child / Adult at Risk name _____

Address _____

Age _____

Your observations (time, date, place, what was said, witnesses, physical evidence (see body map))

Any other witness account

Action you have taken following this disclosure *(You must inform the child and the parent/guardian/carer of the action you are going to take. Do not give an undertaking of absolute confidentiality but assure the child / adult that the matter will be disclosed only to people who need to know about it.)*

Crime Reference (if applicable) _____

Name of member of staff completing form (please print)

Signature of member of staff

Date:

Passed to Safeguarding Officer

Name

Safeguarding Officer Signature

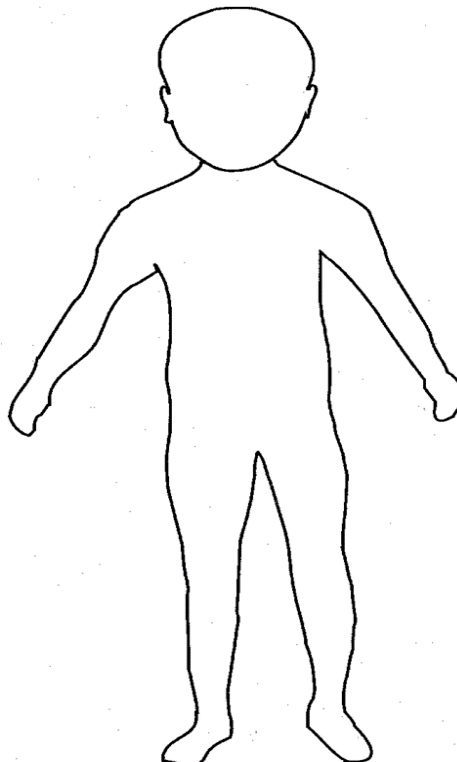
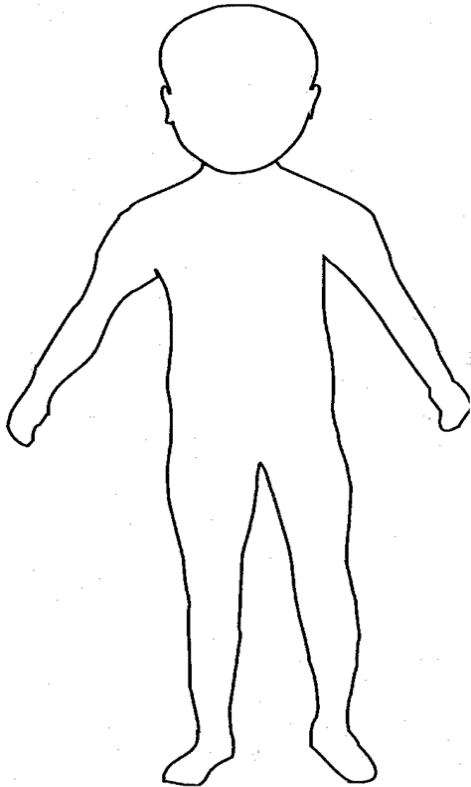
Date form received:

(Appropriate feedback must be given to the person completing the Safeguarding Record)

Body map *if relevant.*

Front

Back



Date saved on EVA
