The Full Moon Theatre Safeguarding Policy

Version Control - Approval and Review

This policy will be reviewed periodically, or following an incident, change in legislation, or other significant factors. It will also be reviewed as part of any safeguarding incident investigation, to test that it has been complied with and to see if any improvements might realistically be made to it.

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	2026-09-01	Initial draft approved	Annually

Purpose

Our charitable activities include working with vulnerable people.

The purpose of this policy is to protect them and provide stakeholders and the public with the overarching principles that guide our approach in doing so.

Lead Trustee

A lead trustee has been appointed to provide oversight of safeguarding and to lead on any incident investigation and reporting.

Lead Trustee	Francesco Anselmo

Applicability

This policy applies to anyone working on our behalf, including our trustees and other volunteers.

Partner organisations will be required to have their own safeguarding procedures that must, as a minimum, meet the standards outlined below, and include any additional legal or regulatory requirements specific to their work. These include, but are not limited to other UK regulators, if applicable.

Safeguarding should be appropriately reflected in other relevant policies and procedures.

Principles

We believe that:

- Nobody who is involved in our work should ever experience abuse, harm, neglect or exploitation.
- We all have a responsibility to promote the welfare of all of our beneficiaries, staff and volunteers, to keep them safe and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which our people not only feel safe, but also able to speak up, if they have any concerns.

Types of Abuse

Abuse can take many forms, such as physical, psychological or emotional, financial, sexual or institutional abuse, including neglect and exploitation.

Signs that may indicate the different types of abuse are at Appendix 1.

Reporting Concerns

If a crime is in progress, or an individual in immediate danger, call the police, as you would in any other circumstances.

If you are a beneficiary, or member of the public, make your concerns known to a member of our team, who will alert a senior member of the charity.

For members of the charity, make your concerns known to your supervisor. If you feel unable to do so, speak to a trustee.

The trustees are mindful of their reporting obligations to the Charity Commission in respect of Serious Incident Reporting and, if applicable, other regulators. They are aware of the Government guidance on handling safeguarding allegations.

Responsibilities

Trustees

This safeguarding policy will be reviewed and approved by the Board annually.

Trustees are aware of and will comply with the Charity Commission guidance on safeguarding and protecting people and also the 10 actions trustee boards need to take to ensure good safeguarding governance.

A lead trustee/committee will be given responsibility for the oversight of all aspects of safety, including whistleblowing and H&SW. This will include:

- Creating a culture of respect, in which everyone feels safe and able to speak up.
- An annual review of safety, with recommendations to the Board.
- Receiving regular reports, to ensure this and related policies are being applied consistently.
- Providing oversight of any lapses in safeguarding.
- And ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Leading the organisation in a way that makes everyone feels safe and able to speak up.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.

- Ensuring that safeguarding requirements (eg DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.
- Making staff, volunteers and others aware of:
    - Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
    - The signs of potential abuse and how to report these.

Everyone

To be aware of our procedures, undertake any necessary training, be aware of the risks and signs of potential abuse and, if you have concerns, to report these immediately (see above).

Fundraising

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children.
- Staff and volunteers are made aware of the Institute of Fundraising guidance on keeping fundraising safe and the NCVO Guidance on vulnerable people and fundraising.
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.
- We do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.
- We are sensitive to any particular need that a donor may have.

Donors in Vulnerable Circumstances

Safeguarding duties include working with potentially vulnerable donors.

- Fundraisers must treat donors fairly, enabling them to make an informed decision, particularly those in vulnerable circumstances.
- Vulnerability is defined as being especially susceptible to harm due to personal circumstances.
- Individuals under 18 or adults lacking capacity are automatically considered vulnerable.
- Fundraisers must not exploit lack of knowledge, need for support or vulnerable circumstances.

- If a donor cannot make an informed decision, donations must not be accepted and must be returned if later discovered.
- Fundraising communications should be clear and inclusive, with adjustments for accessibility.
- Staff should be trained to engage respectfully and identify signs such as difficulty understanding, communicating or weighing decisions.

Online Safety

We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. We may use high privacy settings and password access to meetings to support this.
- The online services we provide are suitable for our users. For example, use age restrictions and offer password protection to help keep people safe.
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow data protection legislation.
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns. Concerns may be reported using this policy, or direct to a social media provider using their reporting process. If you are unsure, you can contact one of these organisations, who will help you.
- We have adopted and comply with the Charity AI Ethics & Governance Framework.

We follow the Charity AI Best Practice Guidance on mitigating the risk of deepfakes and also the ethical use of imagery.

AI Safety

We recognise the growing use of AI and are committed to ensuring our use is both safe and ethical, and to safeguard our community from abuse by others using AI.

- We have adopted and comply with the Charity AI Ethics & Governance Framework, which sets out best practice for responsible AI use, including transparency, accountability, and minimising risks to vulnerable individuals.
- All staff, volunteers, and trustees are required to follow Charity AI Best Practice Guidance on mitigating risks such as deepfakes and the ethical use of imagery.
- We regularly review our AI systems and processes to identify and address potential safeguarding risks, ensuring that personal data is protected and that AI tools do not facilitate abuse, exploitation, or harm.
- We do not allow the use of AI bots for crisis or emotional support, or to provide professional advice, such as medical or legal guidance.

Recording Devices

Smart glasses, wearable devices, mobile phones, video recording drones or any other device that can take photos, record video, record sound, or create AI transcripts may only be used if:

- Those present have given their informed consent and;
- The purpose, storage and retention of recordings meet fully the charity's data protection requirements.

Such devices must not be used:

- During safeguarding, casework, counselling, or other confidential activities except where expressly authorised.
- To record children or vulnerable adults.

Working With Other Organisations

In working with other organisations, including any grant making, we will comply with Charity Commission guidance by carrying out relevant due diligence and having a written agreement that sets out:

- Our relationship.
- The role of each organisation.
- Monitoring and reporting arrangements.

Statutory Guidance and Best Practice

Gov.UK – The role of other agencies in safeguarding

Charity Commission E&W:

Infographic; 10 actions trustees need to take.
Safeguarding duties of charity trustees
Safeguarding - policies and procedures
How to protect vulnerable groups
Managing online risk.

Fundraising Regulator Donors in Vulnerable Circumstances (Jan 26).

ICO

A 10-step guide to sharing information to safeguard children.
Children and the UK GDPR.

Ofcom: Online Safety Act - The Protection of Children Codes and Guidance. (Apr 25)

DfE: Working together to safeguard children.
DfE: Keeping Children Safe in Education
DHSC: Care Act 2014 – Care and Support Statutory Guidance
NHS England: Safeguarding Guidance
DfE/DHSC: SEND Code of Practice (0–25 years)
NSPCC: Safeguarding Children with SEND
SCIE: Care Act – Safeguarding Adults

NSPCC: Writing a safeguarding policy.
Bates Wells: Is your charity ready for the Online Safety Act? (Apr 25).

Thorn (US 501(3)c) – safeguarding against AI child sexual abuse.
Bond - Developing and modelling a positive safeguarding culture: A tool for leaders.
CHS Alliance - Misconduct Disclosure Scheme.

Appendix 1 – AI Risks to Vulnerable People

Threats to vulnerable people include:

- Forming emotional dependence on chatbots.
- Receiving harmful or manipulative advice from an AI bot.
- Using AI for emotional or crisis support, self-diagnosis of medical issues or legal/financial decisions.
- Being scammed or misled by AI generated messages, voices, or images created by others.

Appendix 2 - Signs of Abuse

Physical Abuse

- bruises, black eyes, welts, lacerations, and rope marks
- broken bones
- open wounds, cuts, punctures, untreated injuries in various stages of healing
- broken eyeglasses/frames, or any physical signs of being punished or restrained
- laboratory findings of either an overdose or under dose medications
- individual's report being hit, slapped, kicked, or mistreated
- vulnerable adult's sudden change in behaviour
- the caregiver's refusal to allow visitors to see a vulnerable adult alone

Sexual Abuse

- bruises around the breasts or genital area
- unexplained venereal disease or genital infections

- unexplained vaginal or anal bleeding
- torn, stained, or bloody underclothing
- an individual's report of being sexually assaulted or raped

Mental Mistreatment/Emotional Abuse

- being emotionally upset or agitated
- being extremely withdrawn and non-communicative or non-responsive
- nervousness around certain people
- an individual's report of being verbally or mentally mistreated

Neglect

- dehydration, malnutrition, untreated bed sores and poor personal hygiene.
- unattended or untreated health problems
- hazardous or unsafe living condition (e.g., improper wiring, no heat or running water)
- unsanitary and unclean living conditions (e.g., dirt, fleas, lice on person, soiled bedding, faecal/urine smell, inadequate clothing)
- an individual's report of being mistreated

Self-Neglect

- dehydration, malnutrition, untreated or improperly attended medical conditions, and poor personal hygiene
- hazardous or unsafe living conditions
- unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet, faecal or urine smell)
- inappropriate and/or inadequate clothing, lack of the necessary medical aids
- grossly inadequate housing or homelessness
- inadequate medical care, not taking prescribed medications properly

Exploitation

- sudden changes in bank account or banking practice, including an unexplained withdrawal of large sums of money
- adding additional names on bank signature cards
- unauthorized withdrawal of funds using an ATM card

- abrupt changes in a will or other financial documents
- unexplained disappearance of funds or valuable possessions
- bills unpaid despite the money being available to pay them
- forging a signature on financial transactions or for the titles of possessions
- sudden appearance of previously uninvolved relatives claiming rights to a vulnerable adult's possessions
- unexplained sudden transfer of assets to a family member or someone outside the family
- providing services that are not necessary
- individual's report of exploitation