

## BookTrust

### Safeguarding Policy and Procedures for Children

<b>Document management</b>	
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# 1. SAFEGUARDING POLICY

## 1.1 Policy Statement

BookTrust is the UK's largest children's reading charity. We are dedicated to getting children reading, and our priority is to get more children excited about books, rhymes and stories because if reading is fun, children will want to do it.

We believe all children should have the chance to develop to their full potential and feel safe from the risk of harm or abuse and we want our staff to be alert to the needs of children, including special educational needs and disability, and mental health. We have developed this policy and procedures to provide a clear framework to ensure children are safeguarded and outline how to respond to concerns. Our safeguarding responsibilities extend not only to children but, through our work with vulnerable families, will require us to also consider the safeguarding needs of vulnerable adults.

BookTrust works across England, Northern Ireland and Wales. Our policy provides an overarching framework to be used alongside relevant local safeguarding guidance and legislation for our activity across these nations.

This policy uses the definition of a child from the *Children Act 1989 and 2004*. In this document 'children' includes young people up to 18. The fact that a young person has reached the age of 16, is living independently or is in further education does not change their entitlement to protection.

## 1.2 Application

Our policy applies to all staff, volunteers, trustees and any other individuals who work on behalf of BookTrust irrespective of their role or contract type.

Partners, contractors and third parties are expected to meet minimum similar standards as these outlined in this document and reflect these in their own policies and procedures.

## 1.3 Commitment

BookTrust recognises that:

- The best interests of the child are paramount in all considerations about their protection, including when to maintain confidentiality and when to share information about them
- All children have a right to protection from harm and abuse, regardless of age, ability, gender, racial heritage, religious beliefs, sexual orientation, or identity or other additional vulnerabilities
- Working in partnership with professionals, partners, third parties, children, their parents, carers is essential
- Concerns or allegations that anyone has harmed a child will be managed sensitively and fairly in accordance with this policy and procedures.

Our commitment to safeguard will be demonstrated by:

- Adopting and disseminating child safeguarding procedures
- Using safer recruitment, selection and vetting processes where relevant to role
- Providing staff with induction and regular refresher training appropriate to their safeguarding role and responsibilities
- Having safeguarding arrangements in place with assigned roles and responsibilities
- Informing partners and third parties of BookTrust's safeguarding commitment and expectations.

## 1.4 Breaches

BookTrust is committed to taking all appropriate corrective action, including disciplinary, legal or other action in response to any breaches of this Safeguarding Policy and Procedures.

It is the responsibility of staff to act if there is a cause for concern about a child or the behaviour of an adult towards a child but it is not their responsibility to determine if abuse has occurred or what action is required to protect them. Rather responsibility for deciding whether to escalate a concern to the appropriate authority lays with the BookTrust nominated Safeguarding representatives.

## 1.5 Related Policies and Procedures

Policy or procedure	Version dated
Recruitment and selection	2018
Whistleblowing	2019
Equality and Diversity	2019
Induction & Probationary Review Policy	2019
Disciplinary	2019
Data Protection	2019
Code of Conduct	2019

## 2. UK LEGISLATION AND GUIDANCE

### 2.1 Legislation and Guidance

The following list of legislation and guidance underpins safeguarding.

Working Together to Safeguard Children & HM Government (2015)  
Children Act 1989 and 2004  
UN Convention on the Rights of the Child 1991  
Data Protection Act 1998  
Sexual Offences Act 2003  
What to do if you are Worried a Child may be being Abused HM Government (2015)  
Sexual Offences Act 2003  
What to do if you are worried a child may be being abused  
Charity Commission Guidance; The Essential Trustee 2015  
Keeping Children Safe in Education (KCSIE) 2020

#### Wales

Social Services and Well-being (Wales) Act 2014, Working Together to Safeguard People, Volume 1  
Wales Accord on the Sharing of Personal Information (WASPI) 2013  
All Wales Child Protection Procedures 2008 and All Wales Safeguarding Protocols  
CFOA Safeguarding Children Guidance Note 2014  
Well-being of Future Generations (Wales) Act 2015

#### Northern Ireland

UN Convention on the Rights of the Child 1989 (UNCRC International Treaty)  
The Children (NI) Order 1995  
Co-operating to Safeguard Children and Young People in Northern Ireland (2017)  
Criminal Law Act (NI) 1967  
Sexual Offences (NI) Order 2008  
The Criminal Justice (NI) Order 2008  
Rehabilitation of Offenders (Exceptions) Order (NI) 1979.  
AccessNI

## 2.2 Charity Commission Requirements

BookTrust understands its regulatory requirements outlined by the Charity Commission and the importance of:

- Providing a safe and trusted environment
- Prioritising a safeguarding organisational culture
- Having adequate safeguarding policies and procedures in place

## 2.3 Defining Safeguarding

### Abuse

A form of maltreatment of a child. Working Together to Safeguard Children (DfE 2018) defines four categories of child abuse: physical, emotional, sexual and neglect. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children or adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. They may be abused offline, online or a combination of both.

**Safeguarding and promoting the welfare of children** is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best life chances.

### Child Protection

This is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Different types of abuse may constitute significant harm.

### Abuse and Neglect

Are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in family or in an institutional or community setting by those known to them or, more rarely, by a stranger. They may be abused by an adult or by another child or children. Anyone regardless of gender can be involved in the abuse of children and adults at risk.

### Type of Abuse

There are a number of different types of abuse although in reality more than one type of abuse may be occurring simultaneously or sequentially.

### Non-recent historic allegations of abuse

Any disclosure or concerns that relate to abuse that happened more than a year ago, whether involving anyone working at the BookTrust or outside of it, must still be taken seriously and acted upon in line with the procedures outlined in [Section 4 and 6](#). Often victims of abuse take many years to come forward due to shame and a fear of being disbelieved however the alleged perpetrator may remain a risk to others and therefore all non-recent historic allegations have to be examined. BookTrust will report such cases and concerns to the local authorities and/or the police.

### Additional vulnerabilities including safeguarding disabled children

Some groups of children are particularly vulnerable to abuse either due to impairment and/or life experiences. For example, research shows that disabled children are more likely to be a target for abuse. Equally children who are in the looked after system or those that have already experienced harm may be more vulnerable.

### **Local Safeguarding Children's Board (LSCB)**

In England and Wales LSCB are multi-agency bodies set up to coordinate local work to safeguard and promote the welfare of children LSCB and to ensure the effectiveness of what the member organisations do individually and together in every local authority. The equivalent of LSCB in NI is The Safeguarding Board for Northern Ireland (SBNI) who hold similar responsibilities.

### **Safeguarding Leads and Officers**

Safeguarding Leads, and Safeguarding officers are described as those who hold safeguarding responsibilities.

### **Disclosure and Barring Service UK and AccessNI**

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. Disclosure and Barring Service in NI is carried out by AccessNI.

## **3. SAFEGUARDING ROLES AND RESPONSIBILITIES**

Responsibility for safeguarding is shared by everyone working at BookTrust. This is supported by a clear, accountable structure running through the organisation.

### **3.1 Board of Trustees**

The Board of Trustees are responsible for oversight and scrutiny of strategic and operational safeguarding matters across BookTrust. They review and approve the Safeguarding Policy and support the nominated members of the Senior Leadership Team (SLT) who are Safeguarding Leads (SLs). John Coughlan, Chair of BookTrust is the Board's nominated Safeguarding Champion.

### **3.2 Safeguarding Lead (SL)**

The SL is a nominated member of the SLT who is responsible for safeguarding, ensuring organisational safeguarding policies and procedures are carried out, and providing support and direction to the Safeguarding Officer (SO).

BookTrust's Safeguarding Lead is Diana Gerald (CEO).

### **3.3 Safeguarding Officer (SO)**

Safeguarding Officers (SO) are responsible for safeguarding at an operational level, supporting staff and reporting to the Safeguarding Leads (SLs)

BookTrust's Safeguarding Officers are Salome Osibogun (HR Manager) and Annie Crombie (Director of Programmes and Partnerships).

### **3.4 All staff**

All staff and others covered by this policy have a responsibility for identifying, responding and reporting all safeguarding concerns to one of the Safeguarding Officers (SO) at BookTrust and, where applicable to the Safeguarding Lead (SL) for the relevant organisation. All staff must:

1. Be familiar with BookTrust safeguarding policy and procedures
2. Take action (within the same working day) when a concern arises
3. Report any concern immediately to the SO and where applicable, to the SL for the relevant organisation who will determine the next steps to take
4. Record concerns and actions for and with the SO and in line with the Safeguarding Policies and Procedures of any organisation where the concern or event occurred (e.g. within a school or local authority setting, such as a library).

**To be as helpful as possible the information should include:**

- The nature of the allegation or concern
- A description of any visible bruising or other injuries (location, size, colour or any other significant factor)
- The child's account, if he or she can give them, of what happened
- Any times, dates, or other relevant information
- Whether the parent, carer, child is aware of the concern
- A clear distinction between what is fact, opinion, or hearsay.

**In addition, staff:**

- Should keep a record of the concern using [Appendix 7- Safeguarding Concern Form](#). The form can be completed by the person reporting the concern, or the SO. However, it is the role of the SO to ensure that it has been completed and appropriate action is taken
- Should not determine if abuse has taken place; rather they are responsible for reporting on their concerns to the appropriate individuals within BookTrust such as SO.

## 4. PROCEDURES- WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD

For a quick guide refer to [Appendix 5 - What to do if you have a Safeguarding Concern about a Child; process flowchart](#)

### 4.1 Key Principles

The '4Rs' underpin reporting procedures; they are:

- **Recognise** concerns that a child is being harmed or might be at risk of harm
- **Respond appropriately** to a child who is telling you what is happening to them
- **Refer** the concerns, if appropriate, to Children's Social Care or the Police
- **Record** the concerns appropriately and any subsequent action taken; ensure there is no delay in passing on concerns. Timescales are in place to ensure that matters are resolved in a timely way.

### 4.2 A concern about the safety of a child might arise as a result of:

- A child says that s/he is being abused or is telling you about an experience or event that has happened to them that you think would be harmful (this is sometimes referred to as a 'disclosure' – not to be confused with a criminal records disclosure done by the Disclosure and Barring Service)
- Signs or indicators of abuse or neglect
- Somebody says either face to face or by any other means of communication, that a child is being harmed or is at risk of harm
- The behaviour of an adults towards a child gives cause for concern or vice versa
- A child tells about an experience of abuse in their past - this may be referred to as 'historical or non-recent abuse'.

### 4.3 Responding to a child protection emergency

In an emergency situation where a child has been seriously hurt or is in imminent danger of being harmed, staff must:

- Ring 999 and ask for the emergency service required - police and/or ambulance;
- Inform the SL or a member of the safeguarding team immediately in relation to any incident that occurs at, or organised by an external organisation
- Inform the SO immediately after taking this action
- Complete the [Appendix 7- Safeguarding Concern Form](#)

- Seek support from the SO or SL if required

#### 4.4 Responding to a child protection concern non-emergency

See [Appendix 5 - What to do if you have a Safeguarding Concern about a Child; process flowchart](#)

If responding to a concern external to BookTrust, staff will be required to liaise directly with the SL within the organisation and complete their safeguarding concern form and then inform the SO at BookTrust by completing the relevant sections of: [Appendix 7 - Safeguarding Concern Form](#)

If you identify a safeguarding concern which is **not** immediately life-threatening or risk of serious harm, for example, where someone doesn't require immediate medical attention or is likely to if immediate action isn't taken, you must follow the steps below:

- Step 1** Consult immediately with the SO (or the SL if the SO is unavailable).
- Step 2** Make a careful record of what was said and done using the: [Appendix 7 - Safeguarding Concern Form](#) and pass this on to the SO within 24 hours.
- Step 3** The SO will determine what action is needed (i.e. no action or a referral out to Children Social Care or the Police). Whatever decision is taken they must record it on the [Appendix 7 - Safeguarding Concern Form](#) with a rationale even if no further action is to be taken and a record of any actions on the [Appendix 8 - Safeguarding Action Log](#).
- Step 4** A decision to take no further action, monitor or defer a decision is as serious as a decision to make a referral.
- Step 5** The SO must consider if consent is required from the parents/carers of the child share the concern with the statutory agencies
- Step 6** The SO may consult with the SL or one of the statutory services or the NSPCC Helpline if they are unsure how to proceed with the concern or any aspects of information sharing.
- Step 7** Any referrals to statutory services must be made by the SO unless it is an emergency, or the SO considers it better for the member of staff' to make the referral and report back.
- Step 8** Any referrals to statutory services must be followed up in writing within 48 hours and feedback received/sought within 3 working days of having made the referral to check what action is being taken. It is the responsibility of the SO to do this and record this on [Appendix 8 - Safeguarding Action Log](#).
- Step 9** Each local authority has a process for receiving referrals and so BookTrust must use the relevant process in its area. Staff (normally the SO/SL) must complete the local authority's referral form when making a formal referral about child.

#### 4.5 Responding to a direct disclosure of abuse

Sometimes a child will make a direct disclosure about their experience of abuse; the following guidelines should be followed when responding to this situation:

**Do:**

- Be accessible and receptive
- Listen carefully
- Take it seriously
- Reassure him/her that he/she was right to tell
- Explain what will happen next.

**Don't:**

- React strongly – for instance saying, 'that's terrible'
- Jump to conclusions, especially about the abuser
- Tell him/her you will keep this a secret
- Ask leading questions
- Make promises you cannot keep
- Stop him/her from speaking freely
- Tell him/her to stop talking so that you can fetch the SO.

**4.5.1** In all cases, if BookTrust staff are working with children through another organisation when the concern or incident occurred, this should be reported without delay (and at least within 24 hours) to the SL for that organisation, who will have the contextual knowledge of the child and family. Following this, and within the same 24 hours the SO at BookTrust must also be advised of the concern or incident and information shared with the SO in order that she can liaise with the SL of the organisation, as appropriate, to confirm action taken.

**4.5.2** BookTrust staff must guard against making a decision not to report any issues in the belief that they are protecting a person's cultural or religious beliefs or through fear that their action might be interpreted as being prejudiced.

#### **4.6 Information Sharing and Confidentiality**

Information sharing can be a complex area. The following guidelines should be adhered to:

- Ideally information should be shared where there is consent for so doing
- Data Protection legislation is not a barrier to sharing information about safeguarding
- Be open and honest about what you will do with the information
- Seek advice from appropriate professionals
- Share with consent but don't let 'no consent' prevent sharing if it places child at risk
- Always consider the safety of the child (for instance would telling a child's parents/carers put that child at further risk?)
- Ensure what is shared is necessary, proportionate, relevant, accurate, timely and secure
- Keep a record of what information has been shared and also the reason for seeking consent or not using the [Appendix 8 - Safeguarding Action Log](#)
- The SO or SL is to maintain the Safeguarding action log. The log is confidential to the SO and SL and others that they identify but this should be on a genuine 'need to know' basis
- The Trustee with oversight of Safeguarding will receive an annual overview report of safeguarding concerns or incidents (number and type) and any action taken including any nil returns. The Safeguarding Lead will also notify the Trustee with oversight of Safeguarding on an individual basis of any exceptional safeguarding concerns or incidents for the BookTrust context. Our policy, procedures and risk register will be reviewed in the light of this information.

**4.6.1** All staff have a professional duty to share information with other agencies in order to safeguard children. The public interest in safeguarding children may override confidentiality interests. Information will be shared on a need to know basis only, as judged by the SO and SL. All BookTrust staff and partners must be aware that they cannot promise any child that they will keep information confidential when it concerns safeguarding.

**4.6.2 In the case of child protection**, it is best practice to get consent to share information if possible and as long as it will not increase the risk of harm to the child. In most instances parents/carers and the child depending on his/her age should be informed that you are making a safeguarding referral to Children's Social Care unless to do so might put a child or in further danger, or where you suspect the parents/carers may be directly harming the child or where it might put yourself in danger. If anyone is unsure about this, they should speak to the SO or have a conversation with Children's Social Care to seek further advice.

#### **4.7 Bullying**

Bullying and cyberbullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying (including bullying via the internet or mobile devices) can frequently be underestimated. It can cause considerable distress to children, to the extent that it affects

their health and development or, at the extreme, causes them significant harm (including self-harm).

If staff become aware of a bullying incident the SL of the relevant organisation must be contacted in the first instance using their organisation's concern form. This should be recorded using the relevant sections of [Appendix 7- Safeguarding Concern Form](#) passing it on to the SO at BookTrust within 24 hours of the incident.

#### 4.8 Grooming Behaviour

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking.

Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed or that what has happened is abuse. 'Grooming' is the process through which a person attempts to befriend a child with the intention of later developing a sexual relationship with them. It involves making the child feel comfortable through a variety of methods thus developing trust, before initiating physical contact and abusing that trust. Some argue that the term *entrapment* or *control* better describes this process.

An offender is likely to look to groom the adults as well as the child in order to gain their trust. This process can happen within any setting. Those who sexually abuse children are often experts at gaining confidence and can look for situations where they can have unsupervised access to children.

#### 4.10 Safeguarding in the Online Environment

Children can be abused through the online environment in a range of different ways. BookTrust staff may become aware of this in their work through the following activities:

##### 4.10.1 Indecent Images of Children (IIOC)

If a member of staff is **inadvertently exposed** to IIOC of children whilst using the internet they should take the following steps:

- Step 1** Staff should refer to the SO and [Appendix 7 - Safeguarding Concern Form](#) should be completed and sent to them.
- Step 2** The URLs (webpage addresses) which contain the suspect images should be reported by the SO to the Internet Watch Foundation (IWF) via [www.iwf.org.uk](http://www.iwf.org.uk) – The actual images must not be sent to the IWF or anyone else.
- Step 3** The SO should contact the police. If any copies of images need to be stored at the request of the police, then they should be stored securely where no one else has access to them. If there is a doubt about whether the images are criminal, then a discussion will take place with the police regarding the best way for them to receive copies to determine whether they are criminal or not.

What to do if a member of staff is found **in possession** of IIOC on any electronic device provided by **BookTrust**:

- Step 1** Staff must report what they have found to the SO within 24 hours and the [Appendix 7 - Safeguarding Concern Form](#) should be completed and sent to them.
- Step 2** The URLs (webpage addresses) which contain the suspect images should be reported on to the IWF via [www.iwf.org.uk](http://www.iwf.org.uk) by the SO. You must avoid sending copies of the images to the IWF or anyone else.
- Step 3** The SO should contact the police. If any copies of images need to be stored at the request of the police, then they should be stored securely where no one else has access to them. If there is a doubt about whether the image is criminal, then a

discussion will take place with the police regarding the best way for them to receive copies to determine whether they are criminal or not.

**Step 4** Discuss with the police what to do about the device that the images are on.

**Step 5** Quarantine the device in question and discuss with the police about checking for any other images on that device or any others.

**Step 6** Follow [Section 6 - How to manage safeguarding Allegations Against Staff](#) procedures and police advice.

#### 4.10.2 Grooming

If a child discloses that they are being groomed or abused by someone online or you have suspicions that this might be happening to them you should follow the procedures as outlined in [Section 4 - What to do if you are Concerned About A Child](#) or follow [Appendix 5 - What to do if you are Concerned about a Child; process flowchart](#).

Advice and a report can also be made to Child Exploitation and Online Protection (CEOP) which is a specialist Police command dealing with inappropriate online behaviour - [See Appendix 9 - Safeguarding Contact List](#).

If the adult who is displaying online grooming behaviour is a BookTrust member of staff, partner or third party then follow the procedures in [Section 6 - How To Manage safeguarding Allegations Against Staff](#) or [Appendix 8- How to manage safeguarding Allegations Against Staff; process flowchart](#).

#### 4.11 Images, Photography and Filming

Use of Child Images in Photographs/Website/Filming

BookTrust may take photographs and films through their activities or events. The images and footage may be shared for promotional and marketing purposes with the following guideline and safeguarding measures in place:

- Parental or legal guardian consent is required to use images, photography and filming. The parent or guardian is asked to sign, acknowledging they understand and agree to this.
- Consent and permission forms will outline how the images will be used and how long they will be used for.
- No inappropriate images will be taken
- New permission will be sought for other use of any image, or if the timeframe for using the image has elapsed
- Copies of the consent forms must be sent to the SO for filing
- Project completion is defined as "Once images or streaming have been used for their purpose and no longer required to be kept"
- Names and addresses of children in images must not be stored alongside the actual images.

## 5. CODES OF PRACTICE

### 5.1 Purpose

This code of practice outlines the expectations and behaviour required of all BookTrust staff in relation to safeguarding. Its purpose is to support staff with clear expectations about appropriate standards of behaviour and reduce the possibility of allegations of abuse being made against them. This code of practice works alongside the BookTrust **Policy – Code of Conduct**.

### 5.2 General conduct

- It is expected that all staff set high standards of conduct and behave politely, respectfully, reasonably and professionally to clients, both junior and senior colleagues, and working contacts including beneficiaries, stakeholders and members of the public
- It is expected that all staff co-operate with the reasonable requests and instructions of

managers and senior staff

- Staff should achieve an acceptable standard of dress, neatness and personal hygiene
- BookTrust operates a smart-casual dress code in the workplace, which should not include any items that may be offensive or suggestive to others.

### **5.3 When working with children, you must:**

- Treat all children equally, respectfully, with warmth and empathy, and listen to their wishes and feelings
- Encourage a non-discriminatory environment
- Behave in a calm, positive, supportive and encouraging way with children
- Report on any suspicions, concerns, allegations or disclosures made by a child including poor practice and 'grooming' behaviour
- Ensure the relationship with a child (including their family) that you have met remains professional at all times. The aim should never be to develop the relationship into a friendship or intimate relationship
- Not have time alone with a child both in relation to face to face and online contact. Plan activities that involve more than one other being present, or at least within sight of others
- Respect a child's right to personal privacy but never agree to keep any information relating to the harm of a child confidential
- Risk assess any new activities for children
- Ensure that dangerous or otherwise unacceptable behaviour, including bullying by children are challenged and addressed
- Be aware that children can develop infatuations (crushes) towards adults. If this is happening, you should tell your manager or the SO and then respond to the situation in a way that maintains the dignity of all concerned
- Discourage physical contact. If a child needs physical comfort that this is done in a way that is both age appropriate and respectful of their personal space, with their permission and in the presence of someone.

### **5.4 When working with children, you must not:**

- Conduct a sexual relationship with a child or indulge in any form of sexual contact with a child regardless of the age of consent
- Swear or make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children
- Engage in or allow any sexually provocative games involving or observed by children whether based on talking or touching
- Show favouritism or gossip about children
- Rely on your reputation, position or BookTrust to protect you
- Ask a child questions which may be construed as sensitive without first consulting with a member of staff or other adult responsible for the child
- Let any allegations of abuse or poor practice goes unchallenged or unreported
- Maintain confidentiality about sensitive information to safeguard a child
- Work under the influence of alcohol or drugs, smoke, vape or drink alcohol in front of children
- Discuss your own personal/ sexual relationships in front of children
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, and e-cigarettes from or to a child or their family
- Use any type of physical punishment in order to discipline. Shouting at children should also be avoided whenever possible and only if alternative forms of discipline have failed
- Do things of a personal nature that the child can do for themselves
- Steal, or condone someone else's stealing, regardless of the value the stolen item
- Photograph or film children for which no prior consent has been sought
- Administer First Aid involving the removal of clothing unless in the presence of their parents/carers or others

- Show any audio and/or visual material (CDs, DVDs, videos, photos, films, computer or games etc.) that has inappropriate content for children
- Arrange to meet a child outside of your work context where the purpose is one of friendship or an intimate relationship
- Permit a child to use language that aims to radicalise by supporting terrorism and forms of extremism leading to terrorism
- Personally contact a child through any form of social media
- Investigate any allegation of abuse yourself.

## 6. PROCEDURES- HOW TO MANAGE SAFEGUARDING CONCERNS OR ALLEGATIONS AGAINST STAFF

*See Appendix 6 – How to Manage Safeguarding Concerns or Allegations Against Staff; Process Flowchart*

### 6.1 The aims of these procedures are to ensure that:

- Children and staff are protected and supported following an allegation that they may have been abused by an adult working for or on behalf of BookTrust
- There is a fair, consistent and robust response to any safeguarding allegation made including those that are historical
- There is an appropriate level of investigation into concerns or allegations, whether they are said to have taken place recently, at any time the person in question has been employed by BookTrust or prior to the person's involvement with BookTrust
- BookTrust continues to fulfil its responsibilities towards the member of staff who may be subject to such investigations

### 6.2 Definition of a safeguarding allegation

#### 6.2.1 This is where a person has:

- a) behaved in a way that has harmed a child, may have harmed a child or might lead to a child being harmed
- b) possibly committed or is planning to commit a criminal offence against a child or related to a child
- c) Behaved towards a child in a way that indicates s/he is or would be unsuitable to work with children

#### 6.2.2 The allegation may:

- Involve a child/ren, or adults(s) or both
- Not directly have a 'known child' victim as such. For example, if a member of staff is accessing abusive images of children online or using the internet to groom children with the intent to harm in future
- Be about any type of abuse
- Concern a breach of the BookTrust safeguarding code of conduct
- Relate to a staff member who has left BookTrust (known as a 'historical non- recent allegation')
- Concern about any relative or dependent of a member of staff.

#### 6.2.3 A safeguarding allegation may arise when:

- A child or parent/carer makes a direct allegation against a member of staff or a representative of a partner organisation or others covered by this policy. For example, BookTrust receives a call detailing a safeguarding concern about a bookgifter at a bookgifting session
- A member of staff directly observes behaviour that is cause for concern, for example at an event

- BookTrust receives a safeguarding allegation from any individual in the course of another internal procedure, for example a disciplinary or complaint
- BookTrust is informed by the Police or Local Authority that an individual is the subject of a child protection and/or criminal investigation
- Information emerging from the renewal of a DBS check that a staff member may have committed an offence or been involved in an activity that could compromise the safety of a child/ren
- A member of staff informs BookTrust that they have been the subject of allegations, have actually harmed a child or committed an offence against or related to a child.

**6.2.4** The *How to Manage Safeguarding Concerns or Allegations against Staff* procedure in this section must be followed consistently in all instances, regardless of how the safeguarding allegation arises or from whom, or whether it is shared with BookTrust by email, face-to-face contact, social networking, telephone or letter.

**6.2.5** If a member of staff is concerned about the behaviour of another member of staff then they should not worry about the confidentiality of this information. Even if it turns out to be mistaken, it is better to discuss it and enable a proper investigation and assessment to happen than not report it at all. Do not:

- Ignore concerns
- Confront the person
- Discuss the matter with others apart from those identified in this procedure.

### **6.3 What to do if a safeguarding allegation is made**

*See Appendix 6 - How to Manage Safeguarding Concerns or Allegations against Staff, process flowchart*

**6.3.1** The person who has or receives a safeguarding allegation must make a note of the basic details of the allegation using *Appendix 7- Safeguarding Concern Form* to include:

- The name of the individual who the allegation is about and any other identifying information, including location
- The name of any child involved
- The date and time of the allegation arising
- The name and contact details of the person making the allegation
- Key information about the nature of the safeguarding allegation.

**6.3.2** The person should inform the SO. This should be done within this same working day of the allegation coming to light. If the concern is about the SO then inform the SL.

**6.3.3** If it is considered that a child or adult is subject to life threatening concerns or risk of immediate harm, or needs emergency medical attention, then the emergency services must be contacted straightaway and the parents/carers of the child or told that immediate steps are being taken to get help.

**6.3.4** The SO will inform the Safeguarding Lead within 24 hours who will contact the SL of the relevant organisation and consult with a HR advisor for BookTrust and consider if the allegation is a safeguarding one requiring action.

### **6.4 Managing a safeguarding allegation**

**6.4.1** There may be up to **four strands** in the consideration of any safeguarding allegation:

- |                 |  |
|-----------------|--|
| <b>Strand 1</b> | Enquiries and assessment by social care about whether a child is in need of protection and/or services |
| <b>Strand 2</b> | A police investigation if a criminal offence may have been committed                                   |

**Strand 3** Consideration by an employer of disciplinary action in respect of the individual  
**Strand 4** Referral for 'consideration to bar' a person from working with children (i.e. referral to the Disclosure and Barring Service) and/or referral to a professional registration body for professional misconduct.

- 6.4.2** The SL will oversee the management of all allegations together with an SO where appropriate and hold accountability for them.
- 6.4.3** The SL is responsible for agreeing an initial plan of how to proceed with managing the allegation. They need to agree that the information before them is a safeguarding allegation. The safeguarding allegation may be in respect of the person's employment or behaviour towards any other children including their own.
- 6.4.4** If after the initial consideration, the SL does not consider the matter constitutes a safeguarding allegation then they must decide if an internal investigation is required to determine if the behaviour or incident was related to poor practice or misconduct. The disciplinary process must then be followed. All decisions and the reasons for them, including there being no need to take safeguarding action must be recorded and kept on the individual's file.

**6.4.5 If confirmed as a safeguarding allegation, the SL must agree an initial plan within one working day and should consider the following steps:**

- Step 1** The immediate safety of any relevant child/ren involved, for example those that are the subject of the safeguarding allegation or other children that the individual has contact with through work or family
- Step 2** What information to share with the individual who is the subject of the safeguarding allegation and with any other known employer of the individual, and when to do so
- Step 3** Whether any immediate decision has to be taken about suspension of the individual subject to allegation, pending further enquiries and/or investigation;
- Step 4** Delegation of particular tasks to nominated safeguarding representatives
- Step 5** If any records need to be secured or 'locked down, or any equipment removed from the individual who is the subject of the concern
- Step 6** Whether the criteria is met for referral to the Local Authority and/or the Police; as stated in [section 6](#)
- Step 7** What further information may be required for clarification
- Step 8** Identifying who else is aware of the safeguarding allegation and who has been spoken to
- Step 9** Whether any advice should be sought from the local authority or NSPCC helpline
- Step 10** Arrangements to support the person who is the subject of the safeguarding allegation, the person who raised the allegation and the alleged victim. Where this is not a BookTrust employee these procedures will be carried out by person's employer.

**In addition, there may need to be a plan around the management of information including:**

- Step 11** Who needs to know and what information can be shared
- Step 12** How to manage speculation, leaks and gossip
- Step 13** What, if any, information can reasonably be given to reduce speculation
- Step 14** How to manage press interest if, and when, it might arise

**6.4.6 In the event that a safeguarding allegation is made against:**

- **The SO** - the SL will manage the allegation process
- **The SL** - the Board of Trustees with a nominated person from the SLT or as appropriate

**6.4.7** If it is agreed that the safeguarding allegation meets one or more of the criteria in **Section 6.2.1** then the SO or SL must make a referral within one working day to:

- the Designated Officer for the Local Authority (DOLA) (normally where the child lives) previously and sometimes still referred to as Local Authority Designated Officer (LADO) if the allegation is about behaviour towards a specific child
- the DOLA (or equivalent) where the staff member lives if the allegation is about behaviour but with no identifiable victim.

Some safeguarding allegations are clearly so serious that they require immediate referral to the Police and Children's Social Care. Other allegations that appear to meet the criteria may seem less serious; however, it is important that they are followed up and examined objectively by the external authorities who may hold other relevant information about the individual that is unknown to BookTrust.

**6.4.8** If the allegation is considered to meet the criteria for referral, then the safety and welfare of any child/ren is of the utmost importance, and any child protection investigation and/or police investigation must take priority over any internal BookTrust procedures.

**6.4.9** All decisions and the evidence upon which they are based must be recorded.

## **6.5 Action required of the SO and SL following initial consideration**

**6.5.1** Where the allegation meets the criteria in **Section 6.2.1** SO or SL will make the referral to the Local Authority see **Section 6.4.7** to discuss and agree the next steps, including informing parents/carers of the child concerned (if applicable) about the allegation if they are not already aware of it. Concerns may also be reported to the LADO/DOLA that are not solely in connection with what happens in the working environment. The actions of an individual in their personal life may indicate that their behaviour could be a risk of harm to the children they come into contact with at work.

**6.5.2** The DOLA will discuss the allegation and obtain further details of the allegation and the circumstances in which it was made.

**6.5.3** If there is reason to suspect that a criminal offence may have been committed, the police will be involved in making enquiries. BookTrust is expected to cooperate fully with any police child protection investigation.

**6.5.4** The possible risk of harm to other child/ren must be effectively evaluated and managed in respect of any child/ren involved in the allegations, and any other children in the individual's home, work or community life. In some cases, this will require BookTrust to suspend the member of staff who is the subject of the allegation or cease to use their services. During suspension, the employee must not contact work colleagues or discuss the situation with anyone within the organisation other than their named contact.

**6.5.5** The act of suspension does not indicate a person's guilt. An individual must not be suspended automatically when there has been an allegation or without careful thought.

### **Suspension should be considered in any case where:**

1. There is cause to suspect a child is at risk of significant harm
2. Or, the allegation warrants investigation by the Police
3. Or, is so serious that it might be grounds for dismissal
4. Or, there are concerns that the person about whom the allegations are made may put pressure on or interfere with potential witnesses.

- 6.5.6** The power to suspend the accused member of staff or dispense with the services of the partner or third party is vested in the employer alone. However, in making these decisions the SL will need to take into consideration the views of the Police and the Local Authority.
- 6.5.7** The SL will be responsible for deciding how and when to feedback to the person who made or received the allegation, and what information to give to others who may know the accused individual concerned.
- 6.5.8** The SL will decide on a case-by-case basis if, and when, it is necessary to advise the nominated Safeguarding Champion on the Board of Trustees about the allegation and its management, depending on the seriousness of the allegation, reputational risks, liability and potential media interest.

*See Appendix 6 - How to Manage Safeguarding Concerns or allegations Against Staff; Process flowchart*

## **6.6 Action following the conclusion of the investigative process**

**6.6.1** At the conclusion of any external investigations, the SL and the DOLA will formally review the outcome and determine any further action required. The range of options open will depend on the circumstances of the case and will need to take into account the result of any police investigation or trial, any investigations in respect of the child's safety, as well as the different standard of proof required in disciplinary and criminal proceedings. Options include:

1. Reintegration of the member of staff and all others listed in this document
2. Invoking the disciplinary process
3. Alerting other known employers of the individual concerned (advice may need to be sought from either the DOLA, Police or NSPCC helpline on this point)
4. Referral to the Disclosure and Barring Service (DBS) for consideration to bar the person from working with children

**6.6.2** The following definitions should be used when recording the outcome of an allegation:

1. **Substantiated:** there is sufficient evidence to prove the allegation.
2. **False:** there is sufficient evidence to disprove the allegation.
3. **Malicious:** there is sufficient evidence to disprove the allegation and that there has been a deliberate act to deceive.
4. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The SL, therefore, do not imply guilt or innocence.

**6.6.3** Every effort should be made to reach a conclusion in all cases even if:

- The individual refuses to cooperate, although s/he should be given a full opportunity to answer the allegation and make representations
- It is difficult to reach a conclusion
- The member of staff has resigned or the contractor and/or partner withdraws his/her services
- The person is deceased

**6.6.4** BookTrust **never** agrees to the use of a 'settlement agreement' with a member of staff where there has been an allegation of abuse. This is where the member of staff subject to the allegation agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in future references. Nor can it be used to override BookTrust duty to make a referral to the DBS where they meet the criteria for consideration to bar them from working with children.

**6.6.5** The SL must determine who needs feedback following the conclusion of any investigations and the nature of that feedback in accordance with the principles of data protection and

confidentiality. This might include feedback to the child's parents/carers, and/or the person who raised the concern initially and the line manager of the member of staff.

**6.6.6** If an allegation is determined to be false or malicious, the SL where relevant must consider if any further action is required which includes:

- If the safeguarding allegation was made by a child then there is a need to consider if a referral to Children's Social Care is required to determine if that child is in need of services, or may have been abused by someone else; and/or
- If the safeguarding allegation was deliberately invented or malicious by another adult/s then this should be discussed with the police and advice sought
- Whether disciplinary action is required
- The support needs of the person that was the subject of the safeguarding allegation
- The support needs of an adult survivor of historical abuse

**6.6.7** At the end of the process of managing an allegation and its conclusions, the SL is responsible for the identification of any lessons learned from the operation of this procedure, the actions taken, and the support offered. This learning should feed into policy and procedural revisions and any plans for safeguarding training.

**6.6.8** The SL must provide in writing feedback to the person who has been subject to the investigation, clarifying the final outcome and any implications for their employment. This must be provided within five working days of the conclusion of the investigation.

## **6.7 Poor Practice**

There may be circumstances where allegations are about poor practice rather than child abuse, for example the member of staff has not adhered to the codes of practice within this policy and there are concerns about behaviours. Where there is any doubt you should consult with the SO or SL to consider an assessment or investigation. If the assessment or investigation shows that the allegation is clearly about poor practice then BookTrust will determine how best to remedy this e.g. as part of the Disciplinary Procedure dependent on the nature and seriousness of the practice.

## **6.8 Support**

**6.8.1** BookTrust will fully support and protect any member of staff who, in good faith, reports his or her concern that a colleague is, or may be abusing a child. If an allegation is made that is found to be malicious or fraudulent BookTrust retains the right to take appropriate action against the individual responsible for making the claim.

As an employer, BookTrust has a duty of care to its staff and will therefore act to manage and minimise the stress inherent in the allegations process. In managing any allegation there is a need for the SL to consider the support needs of individuals involved. The support they require depends on the circumstances of the case and will have to be negotiated and agreed on a case-by-case basis. Support may include responding to the impacts of shock, anger or being a suicide risk, for example. It may include support for the:

- Person who raised the concern at the outset
- Person who is the subject of the allegation
- Child/parents/carers, if applicable, where harm was alleged against a particular child

**6.8.2** The SL is responsible for ensuring that the staff subject of the allegation is:

- Informed of the allegation against them (once agreed by the Local authority/Police), notified of the processes that will follow and signposted to independent support should they require it
- Kept up to date about any progress in relation to their case
- Advised to contact their union or professional association at the outset

- Kept up to date about what is happening in the workplace in cases where a staff member is suspended or BookTrust cease to use his/her services. This is to enable their reintegration should they return to work
- Sent correspondence confirming all of the above including the arrangements for support

### 6.8.3 Referral to the Disclosure and Barring Service (DBS) and Professional Regulatory Bodies

Once the final outcome of the allegation management process is concluded, the following actions must be considered by the SL and the DOLA:

- Where a member of staff is engaged in providing 'regulated activity' then the issue of whether they are allowed to continue in this role must be considered by BookTrust depending on the outcome of the enquires. If it is concluded that the person should no longer be engaged in regulated activity, then there is a legal requirement for BookTrust to refer the person to the DBS for consideration to bar the person from working with children. The referral process is outlined on the DBS website and they can be contacted for advice if there is uncertainty as to what to do. It will be lead responsibility of SLs for making referrals to the DBS.
- Where a member of staff may be registered with a professional body or bodies the issue of referral of the member of staff to the professional regulatory body must be considered
- **The Charity Commission** require notification of suspicions, allegations and incidents of abuse or mistreatment of 'vulnerable beneficiaries'. Therefore, the SLs will need to consider if such notification is required and take the necessary steps if required.
- The actions outlined must be considered even if the person has resigned or the volunteering activity has ceased or the person is deceased. A record of all decisions and actions must also be recorded using the [Appendix 8 - Safeguarding Action Log](#)

### 6.9 References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.

## 7. RECORDING, RECORD RETENTION AND DESTRUCTION

### 7.1 Recording

It is essential to keep clear, comprehensive, records of any concern or allegation including details of how they were followed up and resolved, and details of the decisions reached and any action taken.

The purpose of the record is to:

- Enable accurate information to be given in response to any future request for a reference
- Provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction
- Prevent unnecessary re-investigation should an allegation resurface after time
- Provide evidence and information if a decision is made to refer the person for consideration to be barred from working with children
- Enable BookTrust to review and improve policies, procedures and practice based on learning and feedback

## 7.2 Creation and Maintaining

The SO or SL is responsible for creating and maintaining the record during the course of managing a safeguarding concern or allegation.

## 7.3 Additional Records

Additional records e.g. email, hard copy documents are likely to be created as part of an investigation process. Summaries of the content of these will be recorded on [Appendix 8 - Safeguarding Action Log](#). At the end of the investigation the SO or SL will create a file of **all** emails including scanned copies of all hard copy documents. The file must be appended to [Appendix 7 - Safeguarding Concern Form](#) by the SO or SL. All original hard copy documents should be immediately destroyed (post scanning) using the shredder/secure paper collection.

## 7.4 Records of Safeguarding Allegations

Records of safeguarding allegations and any subsequent processes against members of staff must be retained by BookTrust, including for people who leave the organisation, at least until the person reaches 65 years, or for 10 years if that is longer. The records must be stored securely in a password protected folder in a shared drive and with restricted access by the SO and SL and anyone else authorised by them. Details of allegations that are found to be malicious should be removed from personnel records.

## 7.5 Safeguarding Concern Form

All the information relating to a safeguarding concern about a child and subsequent action taken must be recorded using [Appendix 7 - Safeguarding Concern Form](#) and [Appendix 8 - Safeguarding Action Log](#). The records must be stored securely in a password protected folder in a shared drive and with restricted access by the SO and SL and anyone else authorised by them. These records should be retained for a period of 15 years. The period of retention may need to be longer if there has been a complaint in respect of the case or legal proceedings. The reason for keeping a record for longer than 15 years must be documented so as to be in line with the principles of the Data Protection Act.

## 7.6 Retention

Once the requisite retention period has been reached all records should be destroyed using shredding and confidential waste or be electronically purged in accordance with BookTrust's Data Protection Policy. It is the responsibility of SL to check when records are due for destruction and arrange to do this.

# 8. WORKING WITH PARTNERS AND THIRD PARTIES

## 8.1 Expectations of Partners and Third Parties

Our national network of partnerships and partners spans across settings within local authorities.

We expect all delivery partners, contractors or third parties working with BookTrust to meet minimum comparable standards as outlined in this document and have these reflected in their own safeguarding policies and procedures.

For delivery partners, contractors or third parties who do not have specific statutory duties to ensure children are protected from harm, we will either:

- Seek additional written statements of assurance that they have safeguarding policies and processes in place; or
- Expect delivery partners, contractors or third parties to adopt BookTrust's safeguarding policy and procedures and seek written confirmation that they have read and received our policy.

Definitions and a list of organisations with specific statutory duties to ensure children are protected from harm are outlined in [Appendix 10 – Partners with statutory duties](#).

If a DBS check is required for an individual as part of the arrangement with partners, this should be sought by the partner organisation and BookTrust should request confirmation from the partner organisation that all necessary checks (**not just DBS**) have been completed to a satisfactory standard.

## 9. TRAINING

### 9.1 Training

BookTrust are committed to ensuring all staff with safeguarding roles and responsibilities will be trained at the appropriate level to fulfil both their day to day role and safeguarding roles and responsibilities.

BookTrust will ensure its Safeguarding Implementation Plan considers safeguarding training at all levels across the organisation and is reviewed and updated at least annually.

## APPENDIX 1 - SAFEGUARDING ROLES AND RESPONSIBILITIES

### Role Description for Trustees

#### Trustees will:

- Maintain oversight and scrutiny of strategic and operational safeguarding matters across BookTrust
- Regularly review and sign off safeguarding policies and procedures
- Nominate a Safeguarding Champion on the Board whose role is one of scrutiny and to support the SL with safeguarding responsibilities in assessing and managing safeguarding risks where identified
- Monitor compliance of safeguarding training
- Ensure communication of lessons learned throughout BookTrust with the objective of preventing reoccurrence of any safeguarding incidents
- Ensure that there is ongoing monitoring, review and evaluation and that safeguards are being implemented with effective controls in place
- Promote a culture and environment whereby all staff are enabled to raise concerns and understand their safeguarding responsibilities
- Communicate to staff any changes in policy and procedures
- Ensure that BookTrust meets the requirements of its insurers regarding its safeguarding responsibilities
- Trustees will: Be made aware of through an annual overview report of safeguarding concerns or incidents (number and type) including any nil returns that have occurred and any action taken, in order to confirm policies, procedures and risk assessment are consistent with best practice.

### Role Description for Safeguarding Lead (SL)

#### The SL is responsible for:

- Making decisions about appointing someone who has a criminal record
- Ensuring that safeguarding is integrated into all contractual arrangements with partners/Third Parties
- Managing complaints about poor practice of staff in any capacity
- Keeping the Trustees informed about any incidents, risk or deficits, action taken and any further action required in safeguarding arrangements or practices
- Ensuring safeguarding policies and procedures are in place, regularly reviewed, up to date and signed off by the Board of Trustees
- Developing a safeguarding action plan and reporting against it on an annual basis
- Being the point of contact for the Safeguarding Officer (SO) about the safety and welfare of a child
- The provision of appropriate support for staff including safeguarding training, induction and support relevant to their role and responsibility for safeguarding
- Dealing with the aftermath of an incident at BookTrust
- Collating monitoring data on safeguarding activities
- Updating the organisation's policy and procedures on safeguarding
- Quality assurance and monitoring partners/third parties' compliance with safeguarding best practice when providing services
- Considering the safeguarding implications of all existing and proposed new activities, services or developments in the BookTrust
- Together with the Chief Operating Officer (or an equivalent with HR experience) ensuring that safer recruitment practices, including DBS vetting checks, are in place and in operation for appointment of staff engaged in regulated activity. (Regulated activity as defined by the DBS relating to close and unsupervised contact)
- Alerting the DBS in cases where a person is dismissed or has left BookTrust due to the harm or risk of harm they present to children

- Assisting in the management of safeguarding allegations against staff
- Liaising with the Chief Operating Officer (as senior HR representative) as appropriate, about any action taken and any further response required where there have been allegations about staff
- Maintaining links with the relevant Local Safeguarding Children's Board (LSCB) to ensure local procedures are adopted, kept up to date and to become more effective in safeguarding children at strategic level.

### **Role Description for Safeguarding Officer (SO):**

#### **The SO is responsible for:**

- Being the first point of contact for staff who are concerned about the safety and welfare of a child
- Providing information and advice on safeguarding within BookTrust
- Being aware of government guidance on safeguarding
- Making a referral to the relevant authorities following safeguarding incidents and discussion with the SL
- Ensuring that an individual case record is maintained of the concern, action taken, liaison with other agencies and the outcome
- Ensuring appropriate information is available when making a referral and that the referral is made within one working day and confirmed in writing within two working days to Children's Social Care
- Ensure there is an accurate record of concerns and actions taken
- Informing the SL whenever concerns arise about a child so that a decision can be made as to what action to take
- To ensure staff and visitors are aware of BookTrust safeguarding policy and procedures
- Maintaining links with the Local Safeguarding Children's Board (LSCB) to ensure local procedures are adopted, kept up to date and to become more effective in safeguarding children at an operational level. Note that this is the LSCB for BookTrust's office, however if a concern arises then this could include the LSCB where the child is living.

## APPENDIX 2 - DEFINING CHILD ABUSE AND NEGLECT

There are four categories of harm although often children may suffer more than one type of harm.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:

- Not giving the child opportunities to express their views;
- Deliberately silencing them, or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction;
- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual abuse and exploitation** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing and touching outside of clothing;
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by any one group within society. People of any gender can commit acts of sexual abuse, as can other children.

*Child sexual exploitation* is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- Protect a child from physical harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment;
- Neglect can also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## APPENDIX 3 - GROOMING BEHAVIOURS

Signs that an individual may be grooming a child or young person include:

- Being dressed inappropriately around the child or young person;
- Spends most of his/her spare time with children and has little interest in spending time with someone of his/her own age;
- Giving special attention to a particular child or young person;
- Isolating a child or young person from other people;
- Hugging, touching, kissing, tickling, wrestling with or holding a child or young person;
- Giving gifts (including cigarettes/alcohol/drugs) or money for no apparent reason;
- Treating a child as an equal/peer or like a spouse;
- Finding ways to be alone with a child or young person when other adults are not likely to interrupt, e.g. taking the child for a car ride, arranging a special trip, etc.;
- Not respecting the privacy of a child or young person;
- Discussing their own sex life or asking a child or young person to discuss sexual experiences or feelings;
- Viewing abusive images of children ;
- Abusing alcohol or drugs and/or encourages children or young people to use them. The use of such substances reduces inhibitions;
- Allowing children or young people to consistently 'get away' with inappropriate behaviours;
- Encouraging silence or secrets;
- Makes fun of a child's body parts – uses sexualised names for the child or young person;
- Not adhering to the rules, authority or code of practice in the particular setting, organisation or within an activity.

## APPENDIX 4 - BARRIERS TO SEEKING HELP FOR CHILDREN

Many children are reluctant to seek help because they feel that they do not have anyone that they can turn to for support. They may have sought help in the past and had a negative experience, which makes them unlikely to do so again. In an NSPCC study of child maltreatment (2000), only a quarter of the people that had experienced sexual abuse as a child had told anyone at the time. Being unable to tell someone that you are being abused can be very stressful and may leave a vulnerable child at risk of continuing or further abuse.

LGBT children and young people may face additional barriers because they fear 'outing' themselves, have experienced discrimination or bullying because of their identity and do not trust others to be supportive.

Young people may not seek help because they:

- Fear not being believed
- Feel too embarrassed to talk to an adult about a private or personal problem
- Worry that their concern will not be taken seriously
- Worry about confidentiality and lack trust in both the people around them (including parents) and in the services provided to help them
- Fear the consequences of asking for help
- Fear the situation could become worse.

Some groups of children and young people experience more barriers. For example, boys are often more reluctant to seek help than girls. Children with communication difficulties may lack the language necessary to enable them to express what is worrying them. Children that are more isolated are less likely to share their concerns, for example, children living in residential care.

### **Barriers for adults to listen**

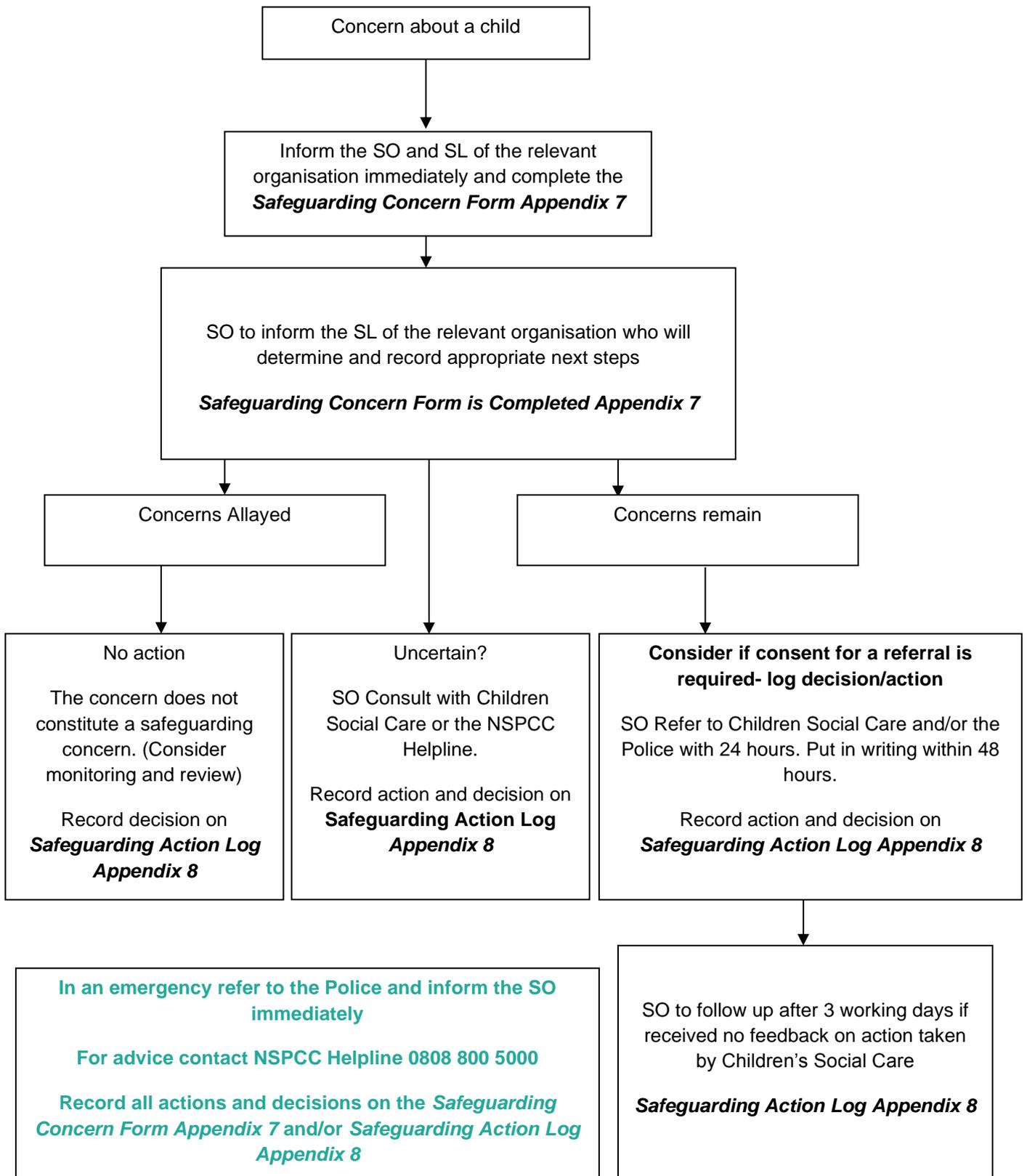
Sometimes there is reluctance by adults to listen to what children are telling them and to act on it. Adults' fears may be due to:

- Lack of trust in the child protection system
- Lack of understanding of the needs and experience of young people
- Not wanting to jeopardise a young person's privacy
- Not knowing how to react or who to tell
- Fear of getting it wrong
- Loyalty to the family or colleagues
- Not recognising the significance of the indicators.

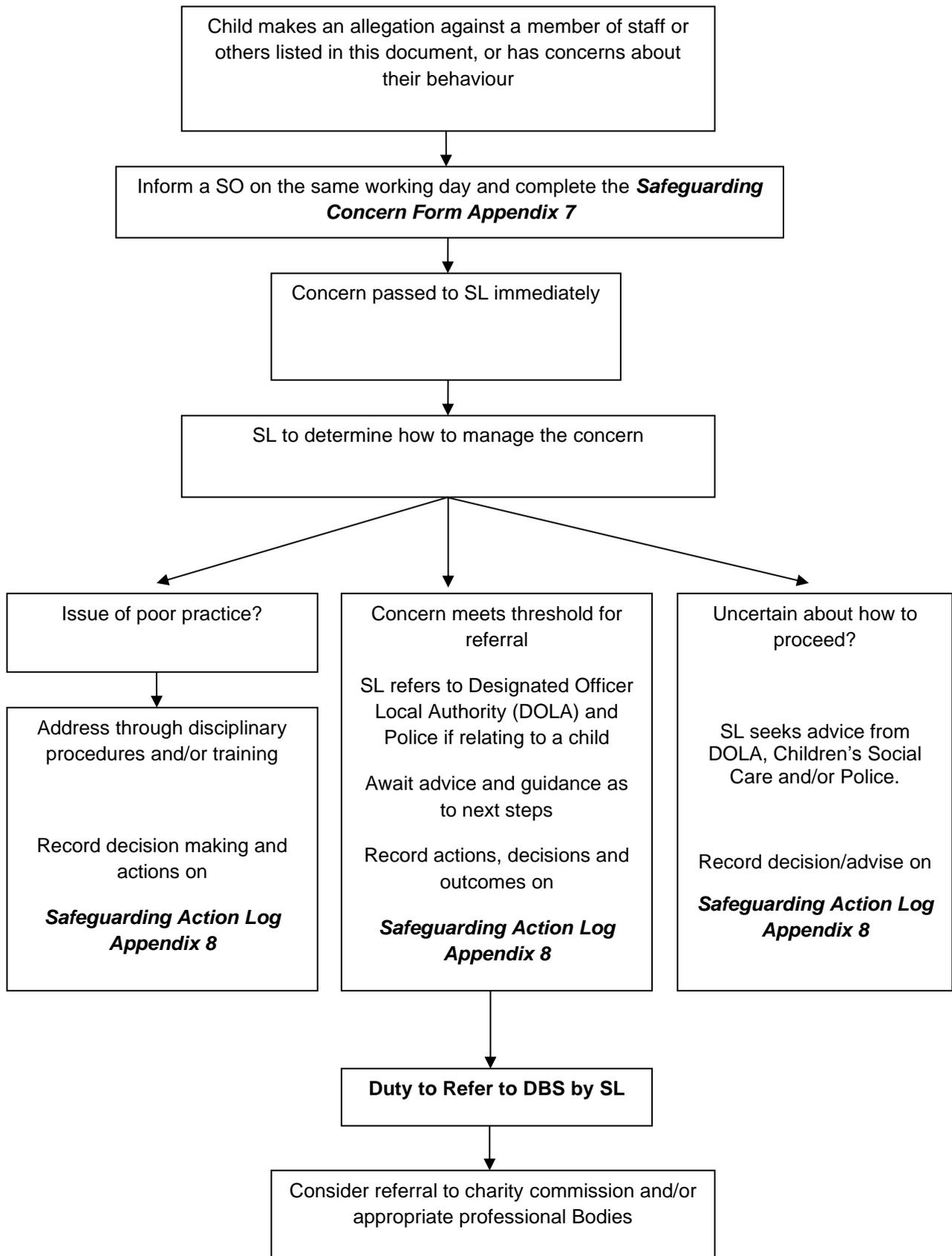
### **How to encourage children and young people to seek help and support**

- Provide signposting to support services
- Make it easier for young people to take up the offer of help
- Listen to the people you help - see the whole person
- Build trust - treat young people with respect
- Empower young people to find their own solutions
- Advertise the benefits of seeking help
- Help to tackle the myths about those who seek help – seeking help is not a sign of weakness.

# APPENDIX 5 FLOWCHART - WHAT TO DO IF YOU HAVE SAFEGUARDING CONCERNS ABOUT A CHILD (NON EMERGENCY)



# APPENDIX 6 FLOWCHART – HOW TO MANAGE SAFEGUARDING CONCERNS OR ALLEGATIONS ABOUT STAFF



## APPENDIX 7 – SAFEGUARDING CONCERN FORM

*Complete as much detail as you are able to. Don't delay making a referral if there is information missing. If you do not know any of this information (i.e. you are at an event), seek this from the relevant practitioner (i.e. who is responsible for the child) as long as the claim is not about them.*

**For any concerns that arise during direct work with children and families linked to a school or local authority event, please use the Safeguarding Concern Form for that organisation.**

- The member of staff leading the event for that organisation must be informed immediately (unless he/she is the cause for the concern) and the Safeguarding Concern Form for that organisation must be completed and given to the Safeguarding Lead for that organisation, as soon as possible and within 24 hours.
- The Safeguarding Officer for BookTrust must also be informed of the concern as soon as possible and within 24 hours.
- The information provided to the SO by a BookTrust employee must be exactly the same as the original information provided to the SL of the organisation and may therefore differ from the headings on the form below.
- The SO for BookTrust will then liaise with the SL of the organisation to confirm next steps.

### Reporting a Safeguarding Concern

- 1. For any safeguarding concern that occurs during direct work with children and families, either face to face or online, which is hosted by a school, a local authority or an external organisation, you must, within 24 hours:**
  - a) Report the concern to the Safeguarding Lead for that organisation**
  - b) Complete the Safeguarding Concern Form for that organisation**
  - c) Notify a BookTrust Safeguarding Officer that you have reported an incident**
  - d) Complete and return Section 1 of the BookTrust Safeguarding Concern Form.**
- 2. For any safeguarding concern which relates directly to a member of BookTrust staff, or occurs during direct work with children and families, either face to face or online, which is hosted and organised by BookTrust, you must, within 24 hours:**
  - e) Notify a BookTrust Safeguarding Officer of an incident**
  - f) Complete and return Sections 1 and 2 of the BookTrust Safeguarding Concern Form.**

BOOKTRUST SAFEGUARDING CONCERN FORM	
This form is divided into three sections.	
<p><b>Section 1</b> is to be completed for all safeguarding concerns.  <b>Section 2</b> is only to be completed if the safeguarding concern relates to a safeguarding incident/event/observation that occurs within BookTrust.  <b>Section 3</b> is to be completed by a Safeguarding Officer in response to all safeguarding concerns.</p>	
Section 1 – This section is to be completed for all safeguarding concerns	
Name of person completing the report (N.B. This should be completed by the person who has the concern and not by a third party)	
Role of person completing this report	
Date	
Location	
Time when report being completed	

Time of incident /event /observation	
Name of the person/s that the concern was reported to (both verbally and in writing)	
Role of the person/s that the concern was reported to	
Name of the organisation who will respond to this concern (For schools, local authorities, and external organisations, please provide full details. For internal concerns, please write: BookTrust).	

**Section 2 – This section is to be completed for all internal BookTrust safeguarding concerns**

**Please use the following information to help you complete Section 2.**

**What is the concern?**

- The incident /event /observation should be described clearly and concisely.
- Where appropriate, record the name/s of those involved, including any witnesses.
- Record where the incident / event /observation took place and how the information came to light.
- Include any questions that were asked (These should only have been open questions for clarity – i.e. Tell, Explain, Describe).
- Any visible physical marks and or injuries should be recorded with sufficient detail using a body map (if available / appropriate). N.B. Do not ask a child to show you any marks or injuries and do not examine the child.
- Do not take any photographs of the incident /event /observation.
- State why you are concerned.

All information recorded should be:

- Legible and written using straight forward language.
- Using the child’s own words (verbatim) as much as possible.
- Factually accurate i.e. not opinion (any interpretation or assumptions should be clearly recorded as such)

The person writing the report form must sign and date it in full (using time, day, month and year) and the form must be passed to the Safeguarding Officer as soon as possible and within 24 hours.

**What is the Concern?** (Please complete your report here using the prompts above)

Signature:

Date (in full):

This form must now be given to BookTrust’s Safeguarding Officer as soon as possible and within 24 hours.

**Section 3 – This section is to be completed by a Safeguarding Officer in response to all safeguarding concerns.**

**What Happens Next?**

The Safeguarding Officer will:

- Complete the form by adding in their own name and date (in full) of when they received the form.
- Record any recommendations, action taken, discussions, telephone calls, consultations, and decisions.
- Sign, date (in full) and file the report securely.

Signature of Safeguarding Officer:

Date (in full) when form received:

Record any recommendations, action taken, discussions, telephone calls, consultations, and decisions.

Sign and date (in full) when case completed and placed on file:

Signature of Safeguarding Officer

Date (in full)

Trustee notified that a safeguarding incident /event /observation has occurred, and all appropriate action has been taken.

Date (in full):

## APPENDIX 8 - SAFEGUARDING ACTION LOG

<b>Date &amp; time</b>	<b>Name of person recording actions</b>	<b>Notes</b>	<b>Action or further follow up</b>	<b>By Whom</b>

## APPENDIX 9 - SAFEGUARDING CONTACT LIST

Name and job title	Safeguarding Role	Contact details
Diana Gerald - CEO	Safeguarding Lead	020 7801 8857 (via PA) 020 7801 8800 (via switchboard if no answer)
Salome Osibogun - HR Manager	Safeguarding Officer	020 7801 8855
Annie Crombie - Director of Programmes and Partnerships		07809 830 734
NSPCC Helpline	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
ChildLine	24-hour helpline for children and young people	0800 1111
Whistle blowing advice line (external)	Advice can be sought from NSPCC if using the BookTrust whistleblowing procedure has not resolved the concern	0800 028 0285
The UK Safer Internet Centre	Provides advice for professionals and responds to reports about sexual abuse images of children online	0844 381 4772
Child Exploitation and Online Protection Centre (CEOP)	Investigates inappropriate online behavior such as grooming online or sexual exploitation	0870 000 3344
Internet Watch Foundation	Remove images of child sexual abuse content and criminally obscene content online	01223 203030
Disclosure and Barring Service (DBS)	Advice line for criminal records checks	03000 200 190
Local authority Children's Social Care (England)	Use the following website to find out the details: <a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>	
Welsh Local Authorities	<a href="http://wlga.wales/welsh-local-authority-links">http://wlga.wales/welsh-local-authority-links</a>	
Northern Ireland	<a href="https://www.nidirect.gov.uk/articles/reporting-child-abuse-and-neglect">https://www.nidirect.gov.uk/articles/reporting-child-abuse-and-neglect</a>	

## APPENDIX 10 – PARTNERS WITH STATUTORY SAFEGUARDING DUTIES

We expect all delivery partners and sub-contractors to meet minimum comparable safeguarding standards as outlined in this document and have these reflected in their policies and procedures.

For our policy, we define an organisation as having a statutory safeguarding duty if:

1. **They are named in Section 11 of the Children Act 2004.** This legislation names organisations, agencies or individual who has a duty to ensure their function – and any services they contract out to others – are discharged having regard to the need to safeguard and promote the welfare of children.
2. **They are a school, college or other educational setting** who must have regard to the statutory Department for Education guidance Keeping Children Safe in Education (2018).

### **Named organisations, agencies and individuals with specific statutory duties under Section 11 of the Children Act 2004 (and which are described in the HM Government guidance *Working Together to Safeguard Children, 2018*)**

- Local authorities and district councils that provide children’s and other types of services, including:
  - Children’s and adult social care services
  - Public health
  - Housing, sport, culture and leisure services
  - Licensing authorities and youth services
- NHS organisations and agencies and the independent sector, including:
  - NHS England and clinical commissioning groups
  - NHS Trusts
  - NHS Foundation Trusts and General Practitioners
- The police, including:
  - Police and crime commissioners
  - The chief officer of each police force in England
  - The Mayor’s Office for Policing and Crime in London
- The British Transport Police
- The National Probation Service and Community Rehabilitation Companies
- Governors/Directors of Prisons and Young Offender Institutions (YOIs)
- Directors of Secure Training Centres (STCs)
- Principals of Secure Colleges
- Youth Offending Teams/Services (YOTs)

### **Schools, colleges and other educational settings**

- Maintained schools (including maintained nursery schools) and colleges
- Independent schools (including academies, academy trusts, free schools and alternative provision academies) and non-maintained special schools
- Pupil referral units (PRUs)

## **What does that mean in practice? Putting our policy into practice.**

1. We should expect all partners to meet the minimum safeguarding standards outlined in our policy.
2. For local delivery partners operating in statutory settings with specified safeguarding duties, we should continue to set out these expectations out in our partnership agreements and receive signed confirmation that they have their own policies and procedures in place.
3. For VCSE organisations who operate in organisations which are expected to have safeguarding policies and processes – but do not have named and specific duties in legislation - we should seek additional written statements of assurance to confirm they have arrangements in place that meet the minimum standards outlined in our policy.
4. For organisations or individual contractors or consultants that don't have their own safeguarding policies or processes in place, we should expect them to adhere to BookTrust's safeguarding policy and seek a written statement of assurance to confirm they have read, received and adhered to our policy.

## **Why? Our rationale.**

1. **Our current local delivery partners work in settings which have specific responsibilities for safeguarding which are set out in legislation.**
  - Our delivery partners are either based in named settings or organisations which have specific statutory safeguarding duties under Section 11 of the Children Act 2004; or they are schools and education providers with specific safeguarding duties.
  - This means they are required to have arrangements in place which reflect the importance of safeguarding and promoting the welfare of children. These expectations are set out in legislation.
  - These expectations are for both their direct functions and any services which are contracted out to others.
  - It is reasonable to expect these organisations will have policies and processes in place which meet the minimum standards outlined in the BookTrust policy
2. **Voluntary, charity, social enterprise, faith-based organisations and private sector organisations (VCSE) are expected to have safeguarding arrangements.**
  - Are expected to have “appropriate arrangements in place” to safeguard children including policies and procedures which all staff, volunteers and trustees are expected to follow.
  - VCSE organisations do not have specific statutory safeguarding duties under Section 22 of the Children Act 2004. The nature, size and services of VCSEs vary.
  - These organisations are likely to have their own safeguarding policies and processes in place. But we would require additional statements of assurance in place to ensure these meet the minimum standards set out in the BookTrust safeguarding policy.
3. **Our expectations about safeguarding and our commitment to safeguarding are set out in a range of documents which cover all external groups.**

## References and sources:

**1. Section 11 of the Children Act 2004**

Available at: <https://www.legislation.gov.uk/ukpga/2004/31/section/11>

Accessed 10 September 2018

**2. Working Together to Keep Children Safe From Harm (HM Government, 2018)**

This guidance summarises the legislative requirements placed on individual services and is produced for all agencies and functions related to children

Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)

Accessed 10 September 2018