BookTrust

Safeguarding Policy and Procedures for Children

Document management	
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Purpose	This policy describes BookTrust's commitment to safeguarding children and lays out operational procedures to support the policy.
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1.1 Overarching Safeguarding Policy and Procedures 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.

All children should have the chance to develop to their full potential and feel safe from the risk of harm or abuse. This policy and procedures provide a clear framework to ensure we play our proper part in safeguarding children (and vulnerable adults) with whom we have direct or indirect contact. All our staff are expected, and will be supported, to be alert and respond appropriately to any safeguarding issue for all children, regardless of their additional needs, disability, mental or emotional health.

BookTrust works across England, Northern Ireland and Wales. This policy and procedure provide 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*. The words 'child' or 'children' in this document therefore refer to any young person up to the age of 18 years, irrespective of their personal circumstances.

We recognise our work may bring us into contact with adults who are vulnerable. The key legislation and guidance underpinning this policy and procedures does not apply to adults in the same way. BookTrust's commitment to safeguarding adults is outlined in *Safeguarding Adults Policy and Procedures.*

1.2   Who Should Read and Use this Policy and Procedures

Our policy and procedures apply to all trustees, staff, volunteers, 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 have their own clear, written, safeguarding policy and procedures which meet minimum standards. (See 1.7)

1.3   Underpinning Principles and 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 these 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 Key Guidance

There is a raft of legislation related to safeguarding. Much of this provides the necessary framework for statutory and other organisations with key responsibilities in this area (Police, Local Authorities, Education Providers). The key guidance which informs this Policy and Procedure, informs working definitions and has significant relevance for BookTrust staff and associates can be found within:
- **Working Together to Safeguard Children** (2023) HM Government
- **What to do if you are Worried a Child may be being Abused** (2015) HMG
- **Working Together to Safeguard People** (2014) The guidance covers the protection of adults and children in Wales
- **Co-operating to Safeguard Children and Young People in Northern Ireland** (2017) Dept. of Health NI
- **Out-of-school settings: safeguarding guidance for providers** (2023) Dept. of Education

1.4.1 Charity Commission Requirements
BookTrust understands and adheres to 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

1.5 Defining Safeguarding

Fuller working definitions of safeguarding terms can be found within the 'Procedures' sections 2.3 and 2.4 of this document.

Key definitions are summarised below:

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.

Abuse and Neglect
These are forms of maltreatment of a child. 'Working Together to Safeguard Children (HMG DfE 2023)' defines four categories of child abuse: Physical, emotional, sexual and neglect.

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. Different forms of abuse may be suffered concurrently and may exist alongside neglect.

1.6 Safeguarding Roles within BookTrust

Responsibility for safeguarding is shared by everyone working at BookTrust. This is supported by a clear, accountable structure running through the organisation. Specific roles are as below: Full responsibilities of the Trustees, Safeguarding Lead and Safeguarding Officers are laid out in *Appendix 1. Safeguarding Roles and Responsibilities.*

1.6.1 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 Procedure and support the nominated members of the Executive Leadership Team (ELT) who hold lead responsibilities for safeguarding. The Board nominate a Safeguarding Champion to lead them in this work.

The Trustee (Champion) with oversight of Safeguarding receives an annual overview report of safeguarding concerns or incidents (number and type) and any actions taken, including any nil returns.

1.6.2 Safeguarding Lead (SL)

The SL is a nominated member of the SLT who is responsible for safeguarding, ensuring organisational safeguarding policy and procedures are adhered to and providing support and direction to the Safeguarding Officers (SOs).

On a case-by-case basis the SL will also notify the Champion Trustee with oversight of Safeguarding of any exceptional safeguarding concerns or incidents with relevance to the BookTrust context.

The SL will ensure BookTrust policy, procedures and risk register are reviewed in the light of any such information.

The SL is responsible for ensuring the proper retention and timely destruction of any safeguarding records.

1.6.3 Safeguarding Officer (SO)

SOs are responsible for safeguarding at an operational level, supporting staff and reporting to the Safeguarding Lead (SL).
SOs will receive safeguarding concerns from staff; ensure safeguarding procedures are followed in each case; ensure records are made in line with the safeguarding procedure.

1.6.4 All staff

All staff and others covered by this policy have a responsibility for recognising, responding to, referring and recording all safeguarding concerns in line with the following procedures. All staff must therefore be familiar with BookTrust safeguarding policy and procedures and will be supported and appropriately trained to meet this expectation.
All staff should guard against making a decision not to report an issue 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.

1.7 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 safeguarding policy and procedures. (The NSPCC on-line guidance or reference to our own policy and procedures may assist in this regard.)

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.

1.8   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.

An update on training, including staff compliance with training expectations, will form part of the Annual Safeguarding Report to the Trustees.

1.9   Related Policies and Procedures

The most recent policies or procedures are relevant with regard to the following:

Policy or procedure
Recruitment and selection
Whistleblowing
Equality and Diversity
Induction & Probationary Review Policy
Disciplinary
Data Protection
Code of Conduct
Managing Allegations (Including Safeguarding Concerns) Against Staff - Being written/ revised
Safeguarding Adults

2. SAFEGUARDING PROCEDURES- WHAT TO DO IF YOU HAVE A CONCERN

For a quick guide refer to *Appendix 4 - What to do if you have a Safeguarding Concern about a Child; process flowchart*

2.1 Key Steps

The '4Rs' underpin these procedures. They are:
- **Recognise** concerns that a child is being harmed or might be at risk of harm
- **Respond appropriately** to the recognised concerns
- **Refer** the concerns, if appropriate, to Children's Social Care or the Police
- **Record** the concerns 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.)

2.2 Recognise

The starting point to a safeguarding concern being addressed is to recognise that such a concern exists. It is important that all staff are alert to how concerns may arise, the types of safeguarding issues which may be encountered and the basic signs and symptoms which may indicate a safeguarding concern .

2.2.1 A concern about the safety of a child might arise as a result of:
- A child saying that s/he is being abused or telling you about an experience or event that has happened to them that you think would be harmful
- Signs or indicators of abuse or neglect
- Somebody saying 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'.

2.2.2 Abuse comes in different forms
Full definitions may be found in 'Working Together To Safeguard Children' and should be referred to if there is any uncertainty, but staff should be aware of the following:
- **Physical Abuse**: A form of abuse which 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:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
- **Sexual abuse:** 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.
- **Child Sexual Exploitation:** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.
- **Neglect:** 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.

2.2.3 Other Potential Safeguarding Concerns
- **Bullying:** May be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves. Bullying may be physical, verbal or emotional and can occur on-line (cyberbullying) or in the physical world.

- **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. If concerned about possible grooming, refer to *Appendix 2. Grooming Behaviours*
- **Peer on Peer Abuse:** Children can abuse other children. This can happen in or outside home or education settings. There are risks this can be normalised or minimalised if seen as 'part of growing up'; boys being boys'; 'normal experimenting' or 'just 'banter'.
- **Historic or Non-Recent Abuse:** A child may refer to past abusive experiences. Even if the child concerned is now clearly safe such a disclosure should be afforded the same level of response as any other. An abuser may still present a risk to others and other children may need help or support.

In all cases any concern should be raised with an SO or the SL

2.2.4 Signs and Symptoms In Addition To Disclosures

Whilst children sometimes disclose directly, concerns are often identified because concerning signs or symptoms are noted. These may be obvious, such as unusual or worrying bruising, but are more likely to be presentations of, or changes to, emotional or physical behaviours. Examples might be flinching away from sudden movements or seeming to try to inappropriately touch others.

Staff should be aware that children are often reluctant to seek help, and when they do, adults can unintentionally not be supportive (See *Appendix 3 Barriers to Children Seeking Help)*

Potential general indicators of concern and specific signs and symptoms of the different forms of abuse are presented on pp's 6 -10 of. 'What To do If You're Worried a Child Is being abused'. It will be useful to refer to these if staff are unsure of concerns.

2.3 Respond Appropriately

If a concern is recognised staff should be clear about the different response required in an emergency and less immediately urgent situation and how to deal with a direct disclosure of a concern from a child.

2.3.1 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 5 - Safeguarding Concern Form*
- Seek further support from the SO or SL if required

2.3.2 Responding To A Non-Emergency Safeguarding Concern

If you identify a safeguarding concern which is **not** immediately life-threatening or presenting immediate risk of serious harm you must follow the steps below:

Step 1 Consult immediately with an SO (or the SL if an SO is unavailable).
Step 2 Make a careful record of what was said and done using the: *Appendix 5 - 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; a referral to Children's Social Care or the Police). Whatever decision is taken they must record it on the *Appendix 5 - Safeguarding Concern Form* with a rationale even if no further action is to be taken and a record of any actions on the *Appendix 6 - Safeguarding Action Log.*

N.B. A decision to take no further action, monitor or defer a decision is as serious as a decision to make a referral.

Step 4 The SO must consider if consent is required from the parents/carers of the child to share the concern with the statutory agencies.

Step 5 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.

2.3.3 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:
o Be accessible and receptive
o Listen carefully
o Take it seriously
o Reassure him/her that he/she was right to tell
o Explain what will happen next.

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

2.4 Refer On When Safeguarding Issues Are Recognised

It is not BookTrust's role to investigate or assess child safeguarding concerns. That responsibility rests with the statutory agencies. It is therefore important for staff to be clear how referrals should be made, what to do if a concern arises in work with another organisation and what information should be shared.

2.4.1 Responsibilities

The decision to refer to statutory agencies, other than in an emergency. will be taken by the SO. (cf. 'Responding to a Non-Emergency Concern'. para. 2.7 above.) 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, because of knowledge or information they hold, to make the referral and report back.

2.4.2 Processes

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 6 - Safeguarding Action Log*.

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.

In responding to a concern external to BookTrust, staff will be required to liaise directly with the SL within that organisation alongside informing the SO at BookTrust and completing the relevant sections of: *Appendix 5 - Safeguarding Concern Form*

2.4.3 When Concerns Arise In Work With Children Though Another Organisation

If BookTrust staff are working with children through another organisation when a concern or incident occurs, this should be reported without delay 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 other organisation, in order that they can liaise with the SL of that organisation to confirm any appropriate action and referral has occurred.

2.4.4 Information Sharing
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 any information received
- 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 6 - 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

2.5 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:
- Provide a clear audit trail of BookTrust's response to a safeguarding concern.
- Enable accurate information to be given in response to any legitimate request for information
- Facilitate HR processes if an allegation involves a member of BookTrust staff
- Prevent unnecessary re-investigation should an allegation resurface in the future
- Enable BookTrust to review and improve policies, procedures and practice based on learning and feedback

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

2.5.2 Recording Template: The Safeguarding Concern Form
All the information relating to a safeguarding concern about a child and subsequent action taken must be recorded using *Appendix 5 - Safeguarding Concern Form* and *Appendix 6 - Action Log* in a shared drive and with restricted access available only to the SO and SL or anyone else authorised by them.

2.5.3 Retention of Records
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 any 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.

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.

2.5.4 Additional Records

If a concern relates to a BookTrust member of staff 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 6 - 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 5 - 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.

2.5.5 Retention of Records of Safeguarding Allegations Against BookTrust Staff

Records of safeguarding allegations and any subsequent processes against members of staff, including for people who leave the organisation, must be retained by BookTrust 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 available only to the SO and SL or anyone else authorised by them. Details of allegations that are found to be malicious should be removed from personnel records.

2.6 Additional Issues related to the Online world

2.6.1 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 alert the SO and send them the completed *Appendix 5 - Safeguarding Concern Form*.

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 – 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 immediately and the *Appendix 5 - Safeguarding Concern Form* should be completed and sent to them within 24 hours.

Step 2 The URLs (webpage addresses) which contain the suspect images should be reported on to the IWF via 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 Managers and HR will follow the 'Managing Allegations Against Staff' procedures and police advice.

2.6.2 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 sections 2.7 - 2.8 of this procedure. (signs of potential grooming are listed in *Appendix 2. Grooming Behaviours).*

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 7 - Safeguarding Contact List.*

If the adult who is displaying online grooming behaviour is a BookTrust member of staff, partner or third-party report this immediately to an SO.

2.6.3 BookTrust 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 are stored alongside the images on our digital asset management system. They are only visible to specific staff members who manage consent forms on the DAM system. Names and addresses are not stored alongside the actual images in any other instances.

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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
- Undertake role specific training
- Undertake periodic DBS checks (usually every three years)
- 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
- Ensure communication with 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 - 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 3 - BARRIERS TO CHILDREN SEEKING HELP

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

```
                    ┌─────────────────────────────┐
                    │     Concern about a child    │
                    └─────────────────────────────┘
                                  │
                                  ▼
              ┌──────────────────────────────────────────┐
              │  Inform the SO and SL of any other relevant│
              │    organisation immediately. Complete the  │
              │   Safeguarding Concern Form Appendix 5     │
              └──────────────────────────────────────────┘
                                  │
                                  ▼
         ┌──────────────────────────────────────────────────┐
         │  SO to inform the SL of the relevant organisation  │
         │   who will determine and record appropriate        │
         │   next steps                                       │
         │                                                    │
         │  Safeguarding Concern Form is Completed Appendix 5 │
         └──────────────────────────────────────────────────┘
```

Concerns Allayed		Concerns remain

No action	Uncertain?	**Consider if consent for a referral is required- log decision/action**
The concern does not constitute a safeguarding concern. (Consider monitoring and review)	SO Consult with Childrens Social Care or the NSPCC Helpline.	SO Refer to Children Social Care and/or the Police with 24 hours. Put in writing within 48 hours.
Record decision on *Safeguarding Action Log Appendix 6*	Record action and decision on **Safeguarding Action Log Appendix 6**	Record action and decision on *Safeguarding Action Log Appendix 6*

In an emergency refer to the Police and inform the SO immediately

For advice contact NSPCC Helpline 0808 800 5000

Record all actions and decisions on the *Safeguarding Concern Form Appendix 7* and/or *Safeguarding Action Log Appendix 6*

SO to follow up after 3 working days if received no feedback on action taken by Children's Social Care

Safeguarding Action Log Appendix 6

Note: Please inform line manager and ELT member that you have raised a safeguarding concern.

APPENDIX 5 – 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.

Section 1 is to be completed for all safeguarding concerns.

Section 2 is only to be completed if the safeguarding concern relates to a safeguarding incident/event/observation that occurs within BookTrust.

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

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 be 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 6 - SAFEGUARDING ACTION LOG

Date & time	Name of person recording actions	Notes	Action or further follow-up	By Whom

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)
Annie Crombie - Deputy CEO	Safeguarding Officer	07809 830 734
Joel Crowley – Schools Design Lead	Safeguarding Officer	020 7801 8824
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 helpline@saferinternet.org.uk
Child Exploitation and Online Protection Centre (CEOP)	Investigates inappropriate online behaviour such as grooming online or sexual exploitation	0870 000 3344 communication@nca.gov.uk
Internet Watch Foundation	Remove images of child sexual abuse content and criminally obscene content online	iwf.org.uk
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: https://www.gov.uk/report-child-abuse-to-local-council	
Welsh Local Authorities	https://www.gov.wales/safeguarding-children-reporting-suspected-abuse-neglect-or-harm	
Northern Ireland	https://www.nidirect.gov.uk/articles/reporting-child-abuse-and-neglect	

Appendix 3

Infographic from The Charity Commission on the 10 actions trustee boards need to take to ensure good safeguarding governance.

10 actions trustee boards need to take to ensure good safeguarding governance
Safeguarding should be a key governance priority for all charities

- Ensure your charity has an adequate safeguarding policy, code of conduct and any other safeguarding procedures. Regularly review and update the policy and procedures to ensure they are fit for purpose
- Identify possible risks, including risks to your beneficiaries or to anyone else connected to your charity and any emerging risks on the horizon
- Consider how to improve the safeguarding culture within your charity
- Ensure that everyone involved with the charity knows how to recognise, respond to, report and record a safeguarding concern
- Ensure people know how to raise a safeguarding concern
- Regularly evaluate any safeguarding training provided, ensuring it is current and relevant
- Review which posts within the charity can and must have a DBS check from the Disclosure and Barring Service
- Have a risk assessment process in place for posts which do not qualify for a DBS check, but which still have contact with children or adults at risk
- Periodically review your safeguarding policy and procedures, learning from any serious incident or 'near miss'
- If you work overseas, find out what different checks and due diligence you need to carry out in different geographical areas of operation

Appendix 4: BookTrust Safeguarding Group Terms of Reference

BookTrust Safeguarding Children Group Terms of Reference

Aim

To provide assurance within the organisation and to relevant external stakeholders that there is appropriate and effective oversight of Safeguarding Children issues within all BookTrust's work.

Scope of work

In order to achieve the aims and objectives, the scope of this project group will include but not be limited to:

- Reviewing, monitoring, and updating policies and procedure.
- Identifying gaps.
- Managing risks.
- Exploring how activities outside core programmes are managed.

Objectives. Within the context of Safeguarding to ensure:

- Our workforce is safely recruited and appointed.
- Our workforce is appropriately informed, trained and supported.
- Internal business processes are proportionate, fit for purpose and adhered to.
- HR processes are appropriate, up-dated as necessary and adhered to.
- Work with and through partners is safely managed.
- Innovation in our work or processes consider any safeguarding implications.
- Any recorded safeguarding concerns and incidents are considered for implications in respect of current processes, policy, procedure, training, or staff support.
- Safeguarding incidents are further reviewed to ensure organisational learning and reflection is undertaken.
- Changes in national or regional safeguarding guidance are reflected in our policy/procedures.

Membership:

The standing membership of the group:

- Joel Crowley – Schools Design Lead (Safeguarding Children Project Manager and DSO)
- Moushomi Rahman - HR Administrator
- Lisa Eldret - Senior Partnership Manager
- Emma Syme - Head of Supply Chain
- Dan Payne - Senior Research and Impact Officer
- Emily Drabble - Head of Children's Book Promotion and Prizes
- Dave Norris - Digital UX Designer
- Rose Dykins - Communications and Stories Officer
- Kate Griffiths - Senior Individual Giving Manager
- Dave Watson- External Advisor
- Diana Gerald - Designated Safeguarding Lead (DSL) – attends if needed
- Annie Crombie - Designated Safeguarding Officer (DSO) – attends if needed

Others

- Meetings chaired by Safeguarding Children Project Manager
- Co-optees for specific agenda items as needed.

Meeting Frequency and Format

- The group will meet quarterly. The DSL may convene extraordinary meetings if necessary.

- An agenda will be agreed by the Chair and DSL or their nominee and circulated to attendees one week prior to the meeting.
- Meetings will last no more than two hours.
- The meeting will be recorded by BookTrust staff and minutes, as agreed by the meeting chair, distributed to attendees and others as needed within two weeks of the meeting. (e.g. others with actions arising from the meeting).

All meetings are hybrid with staff joining online or in-person.