

The Froebel Trust

Safeguarding Policy and Procedures

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The Froebel Trust

Safeguarding Children and Young People

Policy

Foreword

The Froebel Trust endorses and supports the principles of the UN Convention on the Rights of the Child¹, in all our activities and in our respect for children.

In 1989, governments worldwide promised all children the same rights by adopting the UNCRC. The Convention changed the way children are viewed and to be treated – in other words, as human beings with a distinct set of rights instead of as passive objects of care and charity.

These rights describe what a child needs to survive, grow, and live up to their potential in the world. They apply equally to every child, no matter whom they are or where they come from. All children have rights, even those affected by conflict or emergencies.

The Froebel Trust promotes both the spirit and the practical application of these rights for all the children with whom we work or with whom we come into contact, either directly or indirectly through our influencing. This policy and procedure addresses specifically the safeguarding of children in all our activities and is a statement of our commitment to ensure their protection.

Purpose

The overall purpose of The Froebel Trust is to build firm foundations for each child's development through the application of relevant research, teaching and play. In so doing, The Froebel Trust takes all forms of abuse, neglect or harm to children seriously.

The policy and procedures are based on principles of best practice and on current research, legislation, government and local authority guidance, as well as guidance to work overseas and protect children. The purpose is to provide all Trustees, staff and volunteers with a simple framework and process for recognising, responding, reporting and recording any concerns about a child at risk or harm. It also intends to ensure that in the event of a concern about a child, the relevant statutory authorities are involved in an appropriate and timely manner, following local safeguarding child policies and procedures.

Principles and values

The Froebel Trust is a charity based upon the work of Friedrich Froebel in promoting the principles of early years' education. The Principles of a Froebelian Education include the following:

- The integrity of childhood in its own right

¹ also known as the CRC or UNCRC

- “The position of every child as part of nature, family, community, culture and society”
- The uniqueness of every child's capacity and potential
- The holistic nature of the development of every child
- The role of play and creativity as central integrating elements in development and learning

And we add to these a specific recognition of safeguarding that reflects the Froebelian respect for the individual child:

- The right of children to protection from harm or abuse and to the promotion of their overall well-being

Scope

All Trustees, staff or volunteers should follow this safeguarding policy, where there are or have been concerns about a child. It also applies to any researchers, students or sub-contractors, involved in any of our activities in the UK or overseas. A separate section on working overseas can be found in Appendix C.

The policy is written primarily for England and Scotland where the Trust's activities are currently carried out. Distinctions of legislation, guidance, language and terminology are indicated throughout; however for full and up to date information, you are encouraged to read the relevant document/s for each country.

Application

The policy and procedures are written for those of the Trust's activities which specifically come into contact with children either directly through teaching activities or indirectly through research or study opportunities involving children. However, our activities vary in terms of the nature of the contact with children; consequently there may be different levels of expectation about safeguarding. The description of our activities and guidance about how safeguarding is relevant to that activity is as follows:

What to require from those to whom we award grants

All those organisations, individuals or projects to which The Froebel Trust awards grants, in relation to activities or research involving children, should have a safeguarding policy in place. Decisions about awarding grants will take into account the nature of the proposed activity or research and whether or not there are safeguarding measures in place. Our funding agreements will state this requirement about safeguarding so that the expectations are clear at the outset. Unfortunately we cannot offer advice on the development of a safeguarding policy - expert advice should be sought. We recommend the National Society for the Prevention of Cruelty to Children (NSPCC), Safe Network website which offers a range of advice and resources about safeguarding, including *Safeguarding Standards*. www.safenetwork.org.uk

The same expectations and principles apply to The Froebel Trust awarding grants in relation to overseas projects and advice and resources relating to safeguarding (including Standards) can be found at www.keepingchildrensafe.org.uk/resources

If we receive an allegation in good faith that children and young people may be at risk through a Froebel Trust funded organisation, individual or project, we will contact the appropriate authorities, in line with this policy.

Children as research participants

Ethics is a core consideration to most research. This is especially true for research that involves children where there will have to be a balance between the researcher's aims and the protection of any participants.

The UK government has produced the Research governance framework for health and social care (Dolt, 2005) which offers guidance for all researchers and commissioning bodies and is designed to promote critical thinking and allow independent scrutiny of research. The framework also places participant safety at its core. (*Conducting Safe and Ethical Research with Children* NSPCC factsheet 2013 - see Appendix H)

Research is a process. Where children are involved, researchers should constantly review and evaluate the ethics of their approach and the impact on children as participants. This will include knowledge and awareness of safeguarding and child protection policies and procedures; sensitivity to children's experiences, behaviours, and responses to the research in all its manifestations (including published work); and respect for children when accessing data / information about them.

There are three main kinds of research that can involve children or child protection issues.

- Asking children about their feelings, opinions and experiences. This can be done either in face to face interviews with children or by questionnaire. Data can also be gathered by asking parents about their children's experiences.
- Observing children's behaviour. Using monitored experiments or activities or observing children in an uncontrolled environment to see how they react during specific situations.
- Analysing information contained in files about children (for example, social care case records, serious case reviews, schools' records).

You are advised to assess the nature of the proposed research in all cases and to ensure that it is based on clear ethical guidelines with robust measures in place to protect any children who are involved. This should include clear procedures including matters of consent and confidentiality. Please refer to the Factsheet for additional information.

If a researcher suspects that a child might be at risk of harm then the research must be stopped until that child's safety is secured. There must be a balance between the needs of the researcher and the need to protect those children from any further harm. (Gorin et al, 2008). If we receive an allegation in good faith that children and young people may be at risk through a Froebel Trust based or funded research study, we will contact the appropriate authorities.

Training for adults held in settings in which there are children present and with whom the trainees interact

Even if the training being conducted on behalf of The Froebel Trust is for adults, where there are children present, then this safeguarding policy will apply. In addition, if any information emerges during the adult training sessions, that indicates that a child may currently be, or in the past may have been, subject to abuse, then this policy will apply and must be followed.

Before the training event, part of the initial training needs analysis should include asking the commissioners of the training, whether they have a safeguarding policy. It should be made clear that all staff and volunteers working on our behalf, are expected to comply with The Froebel Trust's safeguarding policy and that any concerns of a safeguarding nature that may emerge, will be dealt with under our policy. This may include informing the local authority if necessary.

The trainees within the setting, who may interact with children, or who may encounter safeguarding concerns through the training sessions, will be subject to the safeguarding policy of their organisation, but need to know that Froebel staff or volunteers will be expected to report through their own internal channels.

Working within the safeguarding policies of other institutions

Working together to safeguard children (England 2015) states that:

'Voluntary organisations and private sector providers play an important role in delivering services to children. They should have the arrangements described in paragraph 4 of this chapter in place in the same way as organisations in the public sector, and need to work effectively with the LSCB [Local Safeguarding Children Board].'²

Chapter 2, paragraph 4 of the same document states that:

'These organisations should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including ...' (paraphrased):

- A clear line of accountability
- A senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements
- A culture of listening to children and taking account of their wishes and feelings
- Clear whistleblowing procedures
- A culture that enables issues about safeguarding and promoting the welfare of children to be addressed
- Arrangements which set out clearly the processes for sharing information, with other professionals and with the local safeguarding children board (LSCB)

² *Working together to safeguard children*, Chapter 2, paragraph 43.

- A designated professional lead for safeguarding
- Safe recruitment practices
- Appropriate supervision and support for staff, including induction into child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare
- Clear policies for dealing with allegations against people who work with children.

Similar principles apply in Scotland.

In relation to the work of The Froebel Trust, this means that before any work or projects are agreed with other organisations, the above checks should be made in order to both protect the children with whom our staff or volunteers may be working as well as the staff and volunteers themselves.

Overseas projects

Our role when working in our overseas projects, or when considering setting up a new overseas project should follow the same purpose, principles and values as within this document. However, there are clearly different challenges to safeguarding children overseas, including that:

- Protection systems in many countries are often weak, leaving staff and organisations facing complex safeguarding dilemmas
- Children in emergency situations are especially vulnerable to abuse and exploitation
- There is little common understanding across agencies of safeguarding issues, standards of practice or the organisational implications of vastly different legal, social and cultural contexts and practices
- Particular risks are faced by some children who have extra difficulties getting help, because of their race, gender, age, religion or disability, sexual orientation, social background or culture
- Children may be vulnerable to abuse not only by their parents, carers or individuals in their communities, but also from the staff, volunteers or representatives of the organisation working with them.

Further information on working overseas can be found in Appendix C.

How to use this policy and the procedures

The following two sections describe how concerns might arise in any of the foregoing activities or projects of The Froebel Trust, with specific focus on children in early years settings. However, other signs and indicators are included relating to older children as well as pointing out some of the special considerations relating to disabled children or older vulnerable young people, with whom staff may come into contact.

A brief summary of the relevance underpinning legislation or guidance and definitions of abuse or harm can be found in Appendix A; and Signs and indicators in Appendix B. These

should be used as a guide only and you should always discuss any concerns you may have with your designated person for safeguarding.

A first step is to consider which type of project or activity you are working with (there may be more than one), by using the descriptions 1 – 5, above.

You will then need to assess the nature of the suspected harm and to follow the procedural steps outlined below. To provide you with a simple format we use the model of the **4 'Rs'**. These are described below and will take you through the safeguarding process. Don't forget that this document, whilst primarily being about safeguarding the children with whom Froebel come into contact (directly or indirectly), is also about ensuring that the organisation and those who work or volunteer with us are protected and our charitable status assured.

A flowchart of the process to be followed can be found in Appendix F.

Procedures

How might concerns arise?

First consider the nature of the Trust's project/s you are working within and then read through the following ways that safeguarding concerns about children may arise:

- A child may tell you about something that has upset or harmed them
- You may **observe** something in a child's behaviour, in their drawing or play that indicates that something is causing them worry or upset.
- Someone else might report that a child has told them, or that they believe, that a child has been or is being harmed. This may include what is termed 'historical abuse' i.e. possibly not occurring now, or the person has moved away, but may have happened in the past. Don't forget that if this is the case then the person causing the abuse may still be causing harm to other children and the matter should be reported.
- A child might show signs of physical injury or of chronic neglect for which there appears to be no explanation.
- The behaviour or attitude of one of the volunteers, workers (within Froebel or outside the organisation) towards a child worries you.
- You witness worrying behaviour from one child to another.

Remember that there may be innocent explanations about a change in a child's behaviour or demeanor and do not immediately jump to conclusions that abuse has occurred. The main thing to remember is that any suspicion about a child should be explored sensitively, to follow the procedures in this document and that unlikely though you may feel it may be, you must always consider that abuse could be a possibility.

Those who seek to abuse children do not 'just find themselves' in a compromising situation – they deliberately seek out situations, organisations, settings which:

- Provide easy access to children (or to other vulnerable people – children or adults). Remember that early years children, especially pre-speech, are particularly vulnerable.
- Have no safeguarding principles, policies or processes in place
- Have unsafe recruitment processes and rarely take up reliable references
- Have a culture and a belief that, "it couldn't happen here – we know everyone we work with and anyway it's never happened before".

Barriers to recognition

It is worth remembering that it is commonly believed that a child or young person would resist abuse at all costs or immediately tell a trusted adult. This is not so and in fact children often need to overcome a number of barriers which are very real for them. And for early years' children, they are unlikely to have the vocabulary to tell or may even be pre-speech. Other

reasons why children frequently don't tell about abuse include that they:

- Are scared because they have been threatened
- Believe they will be taken away from home
- Believe they are to blame
- Think it is what happens to all children and is 'normal'
- Feel embarrassed and guilty
- Don't want the abuser to get into trouble
- Have communication or learning difficulties
- May not have the vocabulary for what happened e.g. Use a different first language
- Are afraid they won't be believed.

There are also barriers for us as adults. All of us have a natural revulsion upon hearing someone has maltreated a child and must resist the inclination to dismiss it as true in favour of a more comfortable reason such as, "Oh she's making it up". Other reasons we as adults find it hard to share our concerns may be that we:

- Find it hard to believe what we are seeing or hearing
- Cannot believe the suspicion that may be about someone we know and trust
- Fear we might 'get it wrong' or make it worse
- Fear the consequences of getting it wrong – for the child, young person or vulnerable adult, their family and/or for ourselves and our organisation
- Simply 'don't want to be involved'
- Don't know what to do or who to contact. That's why this policy is so important.

Starting with the 4 'Rs'

The purpose of the 4 'Rs' is to introduce you to the 4 key processes to be followed in all instances of concern about a child: Recognition; Responding; Reporting and Recording.

Recognition – this is the ability to recognise and identify signs and indicators of harm as they are defined in guidance and as they may present during any of The Froebel Trust's activities or projects.

Child abuse affects girls and boys, babies and young people of all ages up to 18, including children with learning difficulties, children with physical disabilities and children from all kinds of family background. It occurs in all cultures, religions and classes. Research³ shows that disabled children are more vulnerable. Abuse may be happening in the home, at activities

³ NSPCC Protecting deaf and disabled children www.nspcc.org.uk/inform

outside of the home or within adolescent relationships. It is rarely conducted by a stranger but by someone known and trusted.

Abuse can result in a child suffering significant harm preventing them from achieving their full potential and undermining their dignity and rights. The harm it causes will affect children while it is happening and in later life. The impact can be educational, emotional, psychological and relational. Therefore historic accounts are to be responded to with the same level of diligence.

First ‘what is abuse?’

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online. (NSPCC)

Digital technology such as the internet and mobile phones may be used as a medium for abuse, for example bullying or targeting through phones or social network sites, ‘sexting’ amongst peers or digitally publishing abusive images of a child.

Next, what are the typical signs and indicators of abuse?

Appendix B provides comprehensive and age related signs of abuse in the context of stages of child development. It aims to help anyone working with children to distinguish between normal child behaviour and those injuries and behaviours which might indicate abuse. Use this as a checklist for concerns you may have, but in all cases, consider seeking advice from your Designated Safeguarding Person (DSP).

In terms of the projects and activities associated with The Froebel Trust, the indicators relating to early years children up to the age of seven are those most likely to apply, but it is worth being familiar with the indicators for older children in case there are older children who may be involved.

What legislation supports safeguarding children?

Appendix A provides a short overview of the legislative framework for child protection in England and Scotland. Appendix C indicates the main legislation protecting children overseas.

Responding – this is the knowledge and confidence to know how to respond directly to a child who may tell you that harm has occurred either to them or to someone else and whom to report any concerns about possible abuse within the relevant timescales. This section also outlines some principles about confidentiality and information sharing as well as describing the role and responsibilities of the Designated Safeguarding Person/s within The Froebel Trust.

Responding to a disclosure of abuse and/or taking the first steps of responding.

Clearly if the situation that has occurred involves a serious incident or injury which merits immediate emergency action, then this takes priority and the police and/or emergency services should be called.

In many of The Froebel Trust's projects (see Projects 3 and 5 above) any direct disclosure is unlikely to take the form of a spoken account by a small child. However, these principles of responding are included as they are relevant to hearing or observing worrying behaviour or receiving information relating to a child abuse concern.

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate point early on to explain that it is likely that the information will need to be shared with others – **never promise to keep secrets.**
- Allow the individual child, young person or adult, to continue at their own pace.
- Ask questions for clarification only, and avoid asking questions that suggest an answer (leading questions).
- Reassure them that they have done the right thing in telling you.
- Ask an adult or older child for their permission to inform appropriate others and explain why: that it is for their own protection and the protection of others. If they refuse permission you still need to discuss this with your DSP who will make an assessment of whether there is an over-riding public responsibility to share the information.
- In light of this tell them what you will do next and with whom the information will be shared. If they are adamant that they do not wish the information to be shared, explain that you will have to tell your designated person and that it will be discussed further with them.
- Be aware of the possibility of forensic evidence if the disclosure or the observed behaviour relates to a possible recent incident of physical or sexual harm or injury and try to protect any supporting materials e.g. bedding or clothing.
- Record in writing as soon as possible, using their words as closely as possible and/or observed behavior or demeanor. Note date, time, any names mentioned, addresses, to whom the information was given and who else is aware of the allegation. Note or describe clearly any visible injury. It can be helpful to jot down a body map sketch showing where and which side of the body an injury was present.
- Contact your manager and/or the designated person as soon as possible **but within 24 hours.**

Confidentiality and information sharing

It is vital that personal information relating to a possible child abuse incident is treated respectfully and confidentially and this form of trust within an organisation is fundamental to

safe practice. Two essential factors should be considered:

- Timely information sharing is essential for safeguarding and promoting the welfare of children. It enables intervention that crucially tackles problems at an early stage
- If a child is at risk of, or suffering significant harm (see Appendix A), the law supports you to share information without consent. This applies to the UK and overseas practice.

Within The Froebel Trust, the decision to share information outside of the organisation, will usually be taken by the DSP. Never assume someone else will pass on information about a child, a parent/carer or other adult that may be critical to keeping a child safe.

If the child is old enough to understand about sharing what they have told you, then you should seek to obtain this either verbally or in writing, making sure that you record this. Clear guidance about sharing information can be found at:

HM Government (2015) *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers* (England), and Scottish Government (2014) *National Guidance for Child Protection in Scotland*

For our overseas projects, see Appendix C

The Designated Safeguarding Lead (DSL) – role and responsibilities

All organisations that provide activities or other services for children (or vulnerable adults), are expected to have in place a clear line of accountability and governance within and across the organisation for the commissioning and provision of all services or educational projects, including rigorous safeguarding arrangements. The designated safeguarding lead is the term often used for the person/s that has/ve the senior lead and everyone should know who this/ese person/s is/are and how to contact them. Designated Safeguarding Lead (DSL) is the term used in The Froebel Trust and the role is accountable for all five projects or services as described above. Arrangements should also be in place for a deputy to be contacted if the DSL is unavailable.

The Chief Executive Gillian Morris Contact details:

Clarence Lodge, Clarence Lane,
Roehampton,
London, SW15 5JW
United Kingdom

Telephone: +44 (0) 20 8878 7546

Email: gillian@froebeltrust.org.uk

At the time of agreeing this policy, the Trust has not yet appointed a lead trustee on safeguarding matters, but will do so. If the Chief Executive is not available, you should contact the office on the number above, or via office@froebeltrust.org.uk. The executive team will put you in contact with the designated trustees or with the Chair of Trustees.

The role and responsibilities of the designated lead are:

- Establish contact with the senior member of children's services in your relevant local authority *before* an incident occurs in order to introduce yourself and your organisation
- Be aware of and familiar with local safeguarding boards or committees and of relevant local (or national) procedures Receive and record information from staff or volunteers who have safeguarding concerns
- Assess the information promptly and carefully, clarifying or obtaining more information about the situation as appropriate; consider other Froebel Trust's UK policies or procedures that may be relevant
- Consult with a statutory agency such as children's services or the police, or the NSPCC helpline to test out any doubts or uncertainties as soon as possible
- Make a formal referral to the statutory safeguarding agency or the police without delay, ensuring referral information is confirmed (under confidential cover) in writing within one working day
- Keep relevant trustees within the Froebel Trust informed of any action taken and update as necessary
- Consider possible disciplinary action within the trust
- ensure a case record is maintained of action taken, liaison with other agencies and outcome deal with the aftermath of an incident within the trust, in terms of offering support
- Advise about any safeguarding children training needs
- Provide information and advice on child protection within the trust Take personal responsibility for keeping updated on new developments in the subject areas The DSL within The Froebel Trust will receive basic level awareness training in safeguarding children as well as specific training for the role of designated lead.

All concerns must be recorded on the Safeguarding Incident report form (Appendix G)

Reporting - this refers to the knowledge about the local authority or national services to whom concerns of abuse or harm should be referred.

Any member of staff or volunteer who suspects that a child has been abused in any way, or about whom there are significant concerns, must immediately report this to their DSP or manager within The Froebel Trust. Advice can also be obtained from the **NSPCC HelpLine 0808 800 5000**. **You should never keep concerns or suspicions to yourself.**

Discuss your concerns with the DSP within The Froebel Trust within 24 hours unless it is an emergency or a crime has been committed. This may lead to a further discussion with someone from your local authority children's social care. If you and your DSP consider that a crime has been committed, involve the police at the earliest opportunity, as it is their responsibility to carry out a criminal investigation. If a serious injury has occurred then you must involve medical or hospital services as soon as possible.

If however, following discussion it is believed that a referral should be made to Children's Social Care then this should be done by the DSP.

Making a referral

The precise procedures may vary between authorities or nations, so it is sensible for the designated person to make sure they are familiar with particular locality procedures and noting the expected timescales. Complete an Incident Reporting Form - Appendix G

Make the referral by **telephone within 24 hours and confirm it in writing within 48 hours**. Agree with the recipient of the referral what the individual will be told, by whom and when. Services should **acknowledge your written referral within one working day** of receiving it, so if after three days you have not heard back from them, you may contact them again.

Children's services will decide on and record the next course of action within one working day usually by holding a strategy meeting within five working days. This decision should normally follow discussion with any referring professional service; consideration of any other information held in existing records and involves discussion with other professionals as necessary, including the police. This may include making an initial assessment of risk, referral to other agencies, provision of advice or information, or no further action. If immediate action to safeguard a child or vulnerable adult is required there will usually be a **strategy meeting**, to which the DSP from The Froebel Trust may be invited. An initial discussion or meeting must take place within three days of concerns being identified.

Remember: it is important that everyone in The Froebel Trust understands that the person who first encounters a suspicion or actual abuse of a child is not responsible for deciding whether or not abuse has occurred. That is the task for the professional agencies following a referral to them.

Recording – this refers to the importance of prompt recording at all stages of your involvement. In all situations, including those in which the cause of concern arises either from a disclosure of abuse or from suspicion of abuse, it is vitally important to record the details, regardless of whether they are shared with a statutory agency, as soon as possible. Complete an Incident Reporting Form Appendix G and with an accurate note being made of the following information:

- Name of person reporting the incident
- Date, time and location of the incident, disclosure or suspicious conversation or observation
- Name, age and any impairment of the individual about whom there are concerns
- Parties who were involved, including witnesses
- What was said, seen or done and by whom
- Whether consent to share information has been given and if not, whether there is an over-riding public concern about safety of the individual or others
- Distinguish between facts and opinions

- Name of the designated safeguarding person, whether they have been contacted, and when. If not, has anyone else been informed?
- Immediate actions taken
- Who else has been informed or should be informed
- Whether a staff member or volunteer is involved in the allegation and any further action, e.g. suspension
- Where relevant, reasons why there is no referral to a statutory agency
- What support is required and has been offered to the child, the volunteer or member of staff involved.

The record should be clear and factual as it may be needed by child protection agencies and may, in the future, be used as evidence in court. Records should be kept securely and shared only with those who need to know about the incident.

Overseas projects

At present The Froebel Trust only works with two overseas projects, one in South Africa and one in India, although the development of others may arise in the future in other countries. The existing two projects are mostly concerned with students or volunteers being sent over to introduce the Froebelian model to early years' practitioners. The volunteers may, or may not have direct contact with children, but those they are training in the model will have direct contact and it is therefore vitally important that safeguarding arrangements are clear and in place in each setting. The Trust's role in influencing early years' practice should not be underestimated in terms of following these procedures.

Any supervision of practice is conducted locally and there may be some oversight by a local NGO working in the area. Again, it is of critical importance that local arrangements for the safeguarding of children are in place and clearly understood by everyone involved in each project. Most NGOs should be familiar with safeguarding/ child protection and have organisational policies and procedures in place, but assumptions should not be made.

The advice in this section and the accompanying Appendix C draws upon 'Keeping Children Safe'⁴ <http://www.keepingchildrensafe.org.uk/> consortium principles, standards and application in overseas settings and everyone involved in overseas projects on behalf of The Froebel Trust, no matter how remote they appear to be from direct contact with children, should read this document and the materials on the website.

The following principles from *Keeping Children Safe* Standard 4 will help you when checking on your local arrangements:

The organisation creates a child safe environment through implementing child safeguarding procedures that are applied across the organisation

⁴ Keeping Children Safe is a network of organisations working together to ensure children globally are safeguarded and protected from all forms of violence, abuse and exploitation.

- Organisations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.
- Child safeguarding risk assessments and mitigation strategies are incorporated into existing risk assessment processes at all levels.
- Child safeguarding measures are integrated with existing processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, partner agreements and management systems etc.).
- A reporting and responding process for incidents and concerns is developed which is locally appropriate.

The following questions may also help in the early stages of commissioning with partner agencies but can equally be used to review arrangements:

Questions to ask of other organisations working with or for The Froebel Trust:

- *In what ways do you come into contact with children?*
- *What is the age range of the children in your project?*
- *Do you have a safeguarding policy?*
- *Do you have a designated safeguarding person or someone who everyone knows to report concerns to?*
- *Do you have a clear reporting line?*
- *Do you know the local safeguarding arrangements?*
- *Are your staff or volunteers trained in safeguarding of children?*

If the answers are mostly negative then it is recommended that you signpost them to the KCS website and suggest that they begin the process of identifying safeguarding arrangements. The Froebel Trust may then wish to reconsider their own arrangements with this organisation on the basis that they are not providing evidence of whether and how they would respond to concerns of a safeguarding nature.

Ideally you should be given a copy of the safeguarding policy of the host organisation or local NGO involved and this should be translated into local languages and be signed off by a management board member.

In terms of the procedure to be followed in the event of concerns, the sections on the **4 'Rs'** (above) will apply in principle. The precise reporting procedure will depend on local arrangements, but in all situations, the volunteer or student working on behalf of The Froebel Trust, should inform the DSP at the earliest opportunity. If a proper mapping exercise has been carried out before the start of the project (or at the last review), then the reporting procedures should be in place and should be followed.

Safer recruitment practices for people working with children ⁵

This section provides guidance on how to recruit safely, ensuring appropriate checks are made. It includes brief guidance on the Disclosure and Barring Service (DBS) in Appendix D and additional guidance on recruiting for overseas projects

Finding and recruiting the right people to work with children can be difficult. The following safer recruitment checklist will help make sure that you recruit appropriate candidates as Trustees, employees or volunteers. (You are advised to use the relevant section on the Saf eNetwork website since it contains pro forms of all the following requirements.)

The Safe Network checklist for safer recruitment

- Write a clear job description (what tasks the applicant will do) and a role profile (what skills the person will be expected to have).
- Use application forms to assess the candidate's suitability for the role. This makes it easier to compare the experience of candidates and helps you to get all of the important information you need to ask.
- Make it clear that your organisation has a commitment to safeguarding and protecting children. You could include this in a job application pack.
- Have a face-to-face interview with pre-planned and clear questions.
- Include a question about whether they have any criminal convictions, cautions, other legal restrictions or pending cases that might affect their suitability to work with children.
- Check the candidate's identity by asking them to bring photographic ID.
- Check the candidate actually holds any relevant qualifications they say they have.
- Apply for a Disclosure and Barring Service (DBS) check
- Take up references. Ask specifically about an individual's suitability to work with children.
- Provide a copy of your organisation's safeguarding procedures and employee/volunteer code of behaviour (i.e. what is and is not acceptable behaviour in relation to children).

Now go to Appendix D if you require more detailed information about the Disclosure and Barring Service.

Code of conduct and professional boundaries

As well as following this safeguarding policy and procedures, all those working in any capacity with The Froebel Trust should behave in accordance with our Code of Conduct and Professional Boundaries. In order to protect vulnerable children, and protect staff / volunteers from false accusations, staff / volunteers should read and follow this document.

⁵ From Safe Network <http://www.safenetwork.org.uk>

It sets out what staff, volunteers and trustees should and should not do in terms of their conduct in carrying out their role and responsibilities within Froebel.

The Code of conduct can be found in Appendix E.

Appendix A Definitions, legislation and guidance (England and Scotland)

England

The Department for Education is responsible for child protection in England. It sets out the national policy, legislation and statutory guidance on how the child protection system should work.

At the local level Local Safeguarding Children Boards (LSCBs) co-ordinate, and ensure the effectiveness of, work to protect and promote the welfare of children. Each local board includes: local authorities, health bodies, the police and others, including the voluntary and independent sectors. The LSCBs are responsible for local child protection policy, procedure and guidance.

Definitions

Children

As stated in the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate does not change their status or their entitlement to services or protection. In this document 'children' is taken to include young people up to 18.

- **Safeguarding and promoting the welfare of children** is defined as:
 - protecting children from maltreatment;
 - preventing impairment of children's health or development;
 - ensuring they are growing up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best life chances.
- **Child protection** is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect children who are suffering or are likely to suffer significant harm.
- **Significant harm** - there are no absolute criteria on which to rely when judging what constitutes significant harm. For the purposes of The Froebel Trust's response to concerns about children, this distinction is the responsibility of children's social care and the police. Any decision about investigating concerns of this nature will therefore be their responsibility.

Legislation

Children Act 1989

Currently provides the legislative framework for child protection in England. Key principles established by the act include: The paramount nature of the child's welfare, and, the expectations and requirements around duties of care to children

Children Act 2004

Strengthens the 1989 Act. Encourages partnerships between agencies and creates more accountability.

Safeguarding Vulnerable Groups Act 2006

Established a single body to make decisions about individuals who should be barred from working with children and to maintain a list of these individuals.

Protection of Freedoms Act 2012

Merged the Independent Safeguarding Authority with the Criminal Records Bureau (CRB) to form a single, new, non-departmental public body called the Disclosure and Barring Service (DBS)

Guidance

Working Together to Safeguard Children (2015)

This is the key statutory guidance in England for anyone working with children in England in March 2015. The guidance is revised every few years and forms the basis to all local authority procedures.

Scotland

The Scottish government is responsible for child protection in Scotland. It sets out policy, legislation and statutory guidance on how the child protection system should work.

Child Protection Committees (CPCs) are responsible for child protection policy, procedure, guidance and practice at the local authority level. CPCs make sure that all the different local agencies, such as children's social work, health services and the police, work together to protect children.

Definitions

Children

The *Protection of Children (Scotland) Act (2003)* covers children up to the age of 18.

A child can be defined differently in different legal contexts. In *The Children (Scotland) Act 1995* a child is defined in relation to the powers and duties of the local authority. Those aged between 16 and 18 who are subject to supervision requirements by a Children's Hearing can be regarded as a child. Those aged over 16 years may require intervention to protect them. The context of the UNCRC however applies to anyone under the age of 18, but Article 1 states that this is the case unless majority is attained earlier under the law applicable to the child.

The term *child protection* is used in Scotland, rather than *safeguarding*, as in England.

Legislation

Children (Scotland Act) 1995

This act provides the legislative framework for Scotland's child protection system. It sets out:

- parental responsibilities and rights, and
- duties and powers public authorities have to support children and intervene if there are concerns about a child.

Protection of Vulnerable Groups (Scotland) Act 2007

This act sets out measures to prevent unsuitable adults from working with children.

Guidance

National guidance for child protection in Scotland

Updated in May 2014 – the *National guidance for child protection in Scotland* provides the current guidance and a national framework for anyone who could face child protection issues at work. Further guidance has been published for health professionals, and protecting disabled children.

Child protection committees will have their own inter-agency child protection procedures which are based on the national guidance.

Appendix B Signs and indicators

[from NSPCC factsheet April 2014]

This factsheet describes signs and indicators of abuse in the context of stages of child development. It aims to help anyone working with children to distinguish between normal child behaviour and those injuries and behaviours which might indicate abuse.

What is child abuse?

Child abuse happens when an adult inflicts harm on a child or young person, even, in some cases, if the adult's actions are not deliberate. There are four broad categories of child abuse:

- physical abuse
- sexual abuse
- neglect
- emotional abuse.

Sometimes children are sexually abused by other children.

Child abuse definitions (England but equally applicable in Scotland)

Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning, slapping or suffocating. It is also physical abuse when a parent or carer fabricates, or induces, the symptoms of an illness in a child.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. It does not necessarily involve violence and the child may or may not be aware of what is happening. Sexual abuse includes: grooming a child with the intention of sexually abusing them; all forms of penetrative and non-penetrative sex; sexually exploiting a child in return for gifts, money or affection; and making, looking at and distributing indecent images of a child.

Neglect is persistently failing to meet a child's basic physical and/or psychological needs resulting in serious damage to their health and development. Neglect is difficult to define as it is hard to describe the absence of something such as love or attention (Daniel et al, 2011). In practical terms, neglect may involve a parent's or carer's failure to:

- provide adequate food, clothing and shelter
- protect the child from physical and emotional harm or danger
- supervise the child properly
- make sure the child receives appropriate medical care or treatment.

Neglect often happens at the same time as other types of abuse (Daniel et al, 2011; Rees et al, 2011).

Emotional abuse is persistent and, over time, it severely damages a child's emotional development. Active emotional abuse involves an adult deliberately trying to scare, humiliate or verbally abuse a child. Passive emotional abuse happens when a parent or carer denies the child the love and care they need in order to be healthy and happy. Such adults might be emotionally unavailable; fail to offer their child praise and encouragement; interact with them in an age-inappropriate way; be over-protective, limiting their opportunities to explore, learn and make friends; or expect the child to meet the parent's own emotional needs.

General signs of abuse

Whilst these following signs do not necessarily mean that a child is being abused, they probably indicate that the child or family is having some problems which should be investigated.

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Showing an inexplicable fear of particular places or making excuses to avoid particular people.
- Self-harming (includes head banging, scratching, cutting).
- Not receiving adequate medical attention after injuries.
- Showing violence to animals, toys, peers or adults.
- Knowledge of "adult issues" e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.

Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development. Below are signs of potential abuse to look out for in children of specific age groups. Remember that children with learning difficulties, physical disabilities or health-related issues may be at a different developmental stage to most of their peers. However, children who have experienced abuse or neglect from a young age may also display developmental delays compared to children their own age. In such cases, the lack of a clear medical explanation for these delays may be an indicator of abuse.

Infancy to preschool

- Doesn't cry or respond to parent's presence or absence from an early age (usually because they have learnt that their parent will not respond to their distress; this is known as a lack of attachment).
- Late in reaching developmental milestones such as learning to speak, with no medical reason.
- Acting out excessive violence with other children.
- Significantly underweight but eats well when given food.
- Talks of being left home alone or with strangers.

Middle childhood

- Talks of being left home alone or with strangers.
- Lacks social skills and has few if any friends.
- Shows lack of attachment to a parent.
- Becomes secretive and reluctant to share information.
- Acting out excessive violence with other children.

School age (5 to 16 years)

- Reluctant to go home after school.
- Unable to bring friends home or reluctant for professionals to visit the family home.
- Poor school attendance and punctuality, or late being picked up.
- Parents show little interest in child's performance and behaviour at school.
- Parents are dismissive and non-responsive to professional concerns.
- Is reluctant to get changed for PE etc.
- Wets or soils the bed.
- Acting out excessive violence with other children.

Adolescence

- Drinks alcohol regularly from an early age.
- Is concerned for younger siblings without explaining why.
- Becomes secretive and reluctant to share information.
- Talks of running away.

- Shows challenging/disruptive behaviour at school.
- Is reluctant to get changed for PE etc.

Physical abuse

It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation. Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. Examples of physical injury may include:

Bruising

- Bruises on the cheeks, ears, palms, arms and feet.
- Bruises on the back, buttocks, tummy, hips and backs of legs.
- Multiple bruises in clusters, usually on the upper arms or outer thighs.
- Bruising which looks like it has been caused by fingers, a hand, or an object i.e. belt, shoe etc.
- Large oval shaped bite marks.

Burns or scalds

- Any burns which have a clear shape of an object, e.g. cigarette burns.
- Burns to the backs of hands, feet, legs, genitals, or buttocks.

Other signs of physical abuse include multiple injuries (i.e. bruising, fractures) inflicted at different times. It is particularly concerning if parents/carers are unable to explain these injuries and it is not clear whether they took the child to receive medical treatment at the time of the injury.

Be vigilant to possible abuse if a child is frequently described as ill by their parent but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition. This may be indicative of fabricated or induced illness.

There are other signs and indicators of abuse that are age specific.

Infancy to pre-school

- Unexplained head injuries to a baby.
- Bruises on babies who are not yet crawling or walking.
- Acting out excessive violence either with toys or peers.

Sexual abuse

It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.

'Normal' sexual behaviour in children

Infancy to pre-school

- Kisses and hugs others.
- Is curious about and looks at other's private body parts; has limited understanding of privacy needs.
- Talks about private body parts.
- Uses words such as 'poo', 'bum' and 'willy' freely.
- Plays 'house' or 'doctor' games.
- Shows, touches, or rubs own genitals, or masturbates as a 'comfort' habit.

Middle childhood

- Kisses and hugs others.
- Displays an interest in others' private body parts but is aware of the need for privacy.
- Talks about and occasionally shows private body parts to others.
- Uses words such as 'poo', 'bum' and 'willy' freely and delights in being 'shocking'.
- Sometimes uses swear words and/or 'sex' words copied from others.
- Plays 'house' or 'doctor' games.
- Sometimes touches or rubs own genitals, or masturbates as a comfort habit.

Pre-adolescent children (aged 10 to 12 years)

- Kisses, hugs, and may 'date' others.
- Is interested in others' private body parts and in the changes occurring in puberty, is aware of the need for privacy.
- May ask questions about relationships and sexual behaviour.
- May look at sexual pictures including internet images.
- Masturbates in private.

Adolescents (aged 13 to 16 years)

- Kisses, hugs, dates others, may have longer term relationships.
- Is interested in and asks questions about body parts, relationships and sexual behaviour. Is aware of the need for privacy.
- Uses sexual language and talks about sexual acts with peers.
- May look at sexual pictures including internet images.
- Masturbates in private.
- Experiments sexually with adolescents of similar age.

The following are age-specific signs and indicators of sexual abuse:

Infancy to pre-school

- Talking about sexual acts or using sexually explicit language.
- Having sexual contact with other children.
- Using toys or other objects in a sexual way.
- Becoming withdrawn or very clingy.
- Physical signs such as anal or vaginal soreness or an unusual discharge.

Middle childhood

- Masturbating in public.
- Showing adult-like sexual behaviour or knowledge.
- Using toys or other objects in a sexual way.
- Becoming withdrawn or very clingy.
- Physical signs such as anal or vaginal soreness or an unusual discharge.

Adolescence

- Masturbating in public.
- Having sexual contact with younger children or older adults.
- Pregnancy when the child does not have a boyfriend.
- Sexually transmitted diseases.

Neglect

It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight,

but is, in fact, naturally thin. Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected.

The following are general and age-specific signs of neglect.

General signs of neglect for children of all age groups:

- medical needs are not being met: not being registered with a G.P.; not being taken to the dentist
- despite having obvious dental problems; failing to ensure that the school has a child's
- medication, e.g. asthma inhalers
- not taking the child to see a doctor when they are ill or have been injured.

There are other signs and indicators of neglect that are age-specific.

Infancy to pre-school

- Frequent and untreated nappy rash.
- Child has numerous accidental injuries and the explanations given suggest a lack of supervision.
- Immunisations are not up to date.
- Child is significantly underweight but eats well when observed.

Middle childhood

- Child has poor school attendance and punctuality and is often picked up late at the end of the day.
- A child is frequently tired at school due to a lack of routine at home (e.g. regular bedtimes).
- Parents are unsupportive and uninterested in the child's education or behaviour.
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food.

Adolescence

- A child is often tired at school due to a lack of routine at home (e.g. regular bedtimes).
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food.

- Parents are dismissive and non-responsive to professional concerns (e.g. the need for medical care or taking action over bullying).

Emotional abuse

It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child.

The following signs may indicate emotional abuse for children of all age groups:

- inappropriate knowledge of 'adult' matters such as sex, alcohol and drugs
- extreme emotional outbursts
- regularly experiencing nightmares or sleep difficulties.

There are other signs and indicators of emotional abuse that are age specific.

Infancy to pre-school

- Over-affectionate towards strangers or people they haven't known for very long.
- Lacks confidence and is often wary or anxious.
- Displays lack of attachment to parent, e.g. when being taken to or collected from nursery etc.
- Is frequently aggressive or nasty towards other children and animals.

Middle childhood

- Frequently soils the bed.
- Language and behaviour are not socially appropriate.
- Struggles to control strong emotions.
- Shows lack of attachment to a parent.
- Lacks social skills and has few if any friends.
- Self-harms, e.g. scratching, head banging.

What to do if you are concerned about a child

Anyone who is concerned that a child is at risk of abuse or neglect should follow their organisation's child protection procedures. Or they can **contact the NSPCC on 0808 800 5000** for advice and support about what action they can take to safeguard a child they are working with.

References

Daniel, B. et al (2011) **Recognizing and helping the neglected child: evidence-based practice for assessment and intervention.** London: Jessica Kingsley.

Rees, G. et al (2011) **Adolescent neglect: research, policy and practice.** London: Jessica Kingsley.

Appendix C Overseas working

For full guidance about working overseas and liaising with other partner organisations, you are advised to go to the Keeping Children Safe website:

<http://www.keepingchildrensafe.org.uk/guidelines/child-safeguarding-standards-and-how-implement-them/page-7>

The website has a wide range of resources based upon four Standards common across all organisations working to safeguard children overseas. All of these Standards may be of value to The Froebel Trust and/or to overseas organisations with which we work, but some relevant excerpts are provided here for quick reference.

The legal framework to all overseas work safeguarding children is the United Nations Convention of the Rights of the Child (UNCRC).

An example of the principles of **Standard 1** is as follows:

- The organisation develops a policy that describes how it is committed to preventing and responding appropriately to harm to children.
- The policy reflects the rights of children to protection from abuse and exploitation as outlined in the United Nations Convention of the Rights of the Child (UNCRC).
 - The policy is approved by the organisation's management body and applies to all the organisation's staff and associates.
 - The policy is publicised in an appropriate manner, promoted and distributed widely.
 - Managers have specific responsibility for overseeing the implementation of the policy.

The KCS Standards will help any NGO or other organisation to develop their own policy and procedures. This is not the responsibility of The Froebel Trust but we should ask questions of them about their safeguarding arrangements and signpost them to the website.

Procedural guidance

KCS Standard 3 helps ensure all project managers think about child safeguarding issues when designing projects, so reducing potential risks to children.

S 3 The organisation creates a child safe environment through implementing child safeguarding procedures that are applied across the organisation.

- Organisations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.
- Child safeguarding risk assessments and mitigation strategies are incorporated into existing risk assessment processes at all levels.
- Child safeguarding measures are integrated with existing processes and systems (strategic planning, budgeting, recruitment, programme cycle management,

performance management, procurement, partner agreements and management systems etc.).

- A reporting and responding process for incidents and concerns is developed which is locally appropriate.

How to meet the Standard

Think global, act local – measures in local contexts

- Child safeguarding measures must be integrated in an organisation's systems and processes for both different country and local contexts. The measures have to work for the local context but also adhere to global and regional standards.
- Definitions of 'child' and 'child abuse' may differ according to national and cultural understandings. However, organisations need to be clear that 'children' are defined as anyone less than 18 years of age and that 'abuse' is the range of acts, intentional or otherwise, which harm children.
- There need to be consultations with staff across the organisation in order to give clear guidance on these issues and how to respond when concerns arise. Child safeguarding measures must be sensitive to the local culture but the issue who is a child and what constitutes abuse is clearly set out in global and regional standards and frameworks and must be applied across the board.
- Organisational systems and processes for running organisational business may differ across offices, regions and countries. They must be risk assessed in each locality and strategies developed for integrating child safeguarding where relevant.
- Organisations also need to be prepared to take action locally when concerns arise. They will therefore need to have information on local services, authorities to whom reports should be made, and organisations working locally, which can provide support where needed.

Checklist of local information and resources

Legal Resources

- Details of any government bodies or organisations with statutory authority for the safeguarding of children.
- Summary of legislation governing welfare/safeguarding/protection of children.
- International conventions to which the country is a signatory or has ratified (for instance: UN Convention on Rights of the Child).
- Brief analysis of implementation/enforcement of legislation as far as this is known.
- Local police position on investigation of criminal assault against children and likelihood of prosecution of such offences.
- Legal age of consent in country and legislation covering this.

Other Organisations: Health Services, NGOs, Inter-organisation Forums

- Details of health and other services that may be accessed as part of victim response.
- Details of NGOs and other organisations, relevant bodies and professional networks, including any local joint arrangements for dealing with child safeguarding issues, HIV, women's centres/refuges or safe housing.
- Establish contact with any academic institutions working on children's rights.
- Identify and establish contact with locally-based NGOs/INGOs and other organisations working on child protection/rights or aid programmes that affect children.

Community

- Information on the kinds of behaviour seen in the local area that may cause harm to children.
- Identify and document harmful practices such as early/forced marriage, initiation ceremonies, and female circumcision (FGM).
- Details of informal/community based justice and safeguarding mechanisms and how these function.
- Gather information about community resources such as local advocacy groups, community and faith groups, or organised children's activities which could support the child safeguarding work.

Definitions of harm

The four categories and signs and indicators in Appendix B will also apply to overseas settings with the following additional categories and indicators:

Child sexual exploitation: a form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple adults.

Commercial exploitation: exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour. See

http://www.antislavery.org/includes/documents/cm_docs/2009/c/child_labour.pdf for further information.

Other resources

The *Keeping Children Safe* website offers the following additional resources free of charge:

- Keeping Children Safe Online: a guide for organisations
- Child safeguarding guidance for journalists and film makers
- Child safeguarding and HIV – a pocket guide

There is also a useful Blog, entitled, *Child Safeguarding in International Schools: A Responsibility for All* (Submitted by Sally Warren on Thu, 07/09/2015). Find out more about the consultancy service for International Schools at: www.keepingchildrensafe.org.uk/kcs-consulting

Reporting procedures

All staff and associates should be alert to signs that may suggest a child or young person is in need of help. Deciding whether to report can be a very difficult responsibility. The procedure needs to be made widely available to ensure that everyone is clear what steps to take regarding the safety of children and other witnesses. The first stage is to decide whether the concerns are internal to the organisation or relate to an external situation.

When a child safeguarding concern is brought to your attention – **ACT**

Act on your concerns. If in doubt, speak out!

Child-centred. The protection of children is the most important consideration.

Time counts. Ensure timely, effective, confidential and appropriate responses to child safeguarding issues.

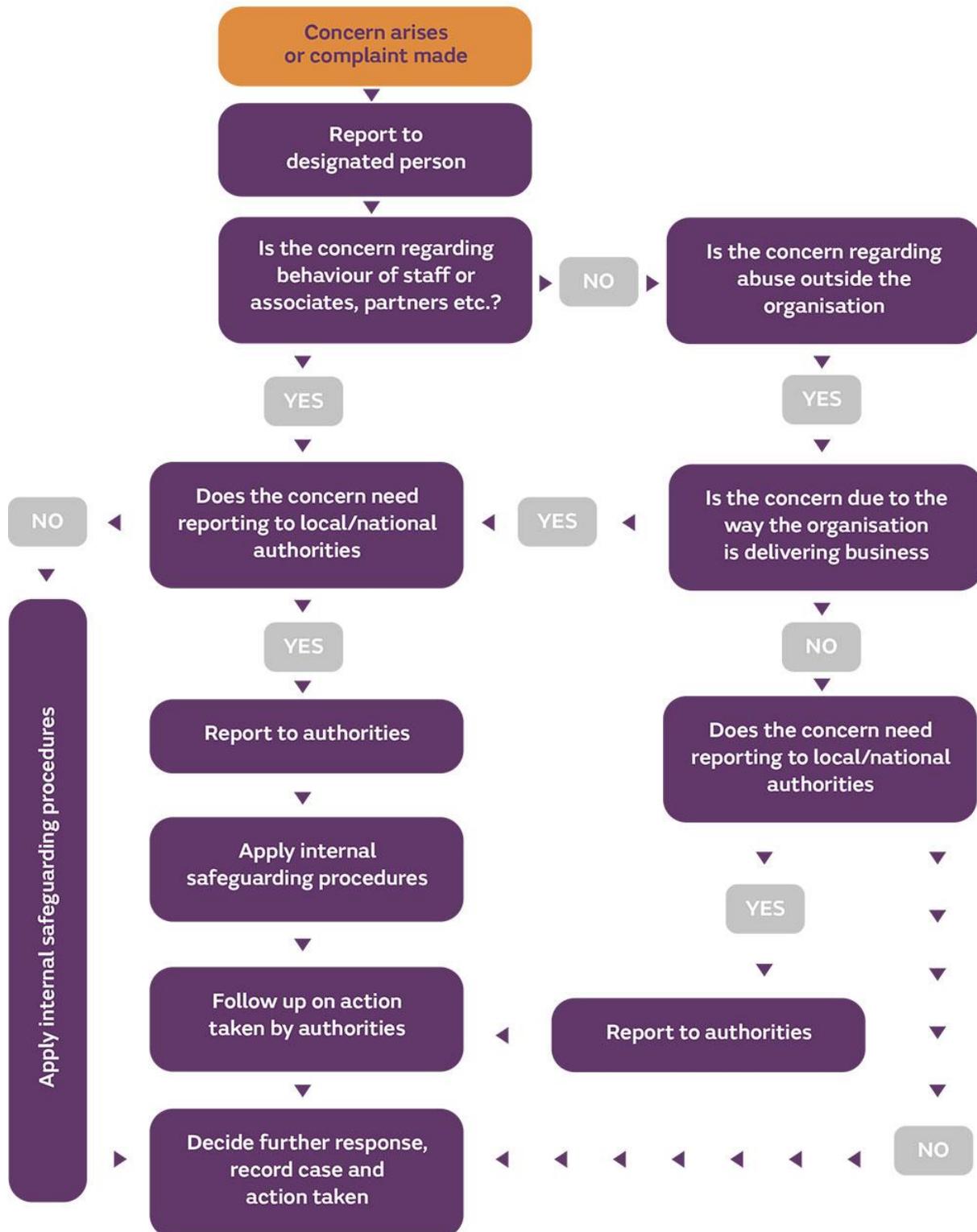
From Plan International, Child Protection Policy Reporting and Responding to Child Protection Issues in Plan

All local reporting procedures need to be developed and agreed with the local community and local staff. If communities or staff are not comfortable with or confident in the reporting mechanisms, they will not use them. Consider also other barriers facing staff, children or communities reporting abuse and how they might be overcome with appropriate procedures.

The guiding principle is that the safety of the child is always the most important consideration. Any allegation or concern regarding the abuse of a child must be treated seriously. For this reason it is vital that anyone raising a concern should strictly follow reporting procedures. Particular care should be taken in regard to confidentiality and the sharing of information with appropriate people.

The flow chart at the end of this section, from the Keeping Children Safe website is an example of a reporting procedure that can be adapted for any organisation.

The following is an example of a reporting procedure that can be adapted for organisations.



Appendix D Safer recruitment and the DBS

Please see below for the arrangements in Scotland

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaced the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) as part of the Protection of Freedoms Act 2012.

The DBS are responsible for:

- processing requests for criminal records checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list placing or removing people from the
- DBS children's barred list and adults' barred list for England, Wales and Northern Ireland

Criminal record checks – the DBS searches police records and, in relevant cases, barred list information, and then issue a DBS certificate to the applicant.

Referrals – these are made to the DBS when an employer or organisation (e.g. a regulatory body) has concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children.

Barring - the DBS aim to make fair, consistent and thorough barring decisions that are an appropriate response to the harm that has occurred, as well as the risk of harm posed.

The DBS website has detailed information on each of these areas but helpful reports and guidance on particular topics which are regularly updated.

The DBS also provides information and help via

- email – customerservices@dbs.gsi.gov.uk
- DBS helpline 03000 200 190 and minicom 03000 200 192

How to get a DBS check?

- Individuals cannot request a DBS check for themselves.
- Applicants must be 16 years old or over
- The request for a DBS check must come from the organisation recruiting the individual or smaller organisations can obtain DBS checks by going through an umbrella body.

Types of criminal records check

The employer or organisation running the check should provide the applicant with more information about the level of check required.

There are 3 types of check:

Standard (£26)

This checks for spent and unspent convictions, cautions, reprimands and final warnings, and will take about 2 weeks.

Enhanced (£44)

This includes the same as the standard check plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child or 'other' workforce). It takes about 4 weeks.

'Other' workforce means those who don't work with children or adults specifically, but potentially both, eg taxi drivers. In this case, the police will only release information that's relevant to the post being applied for.

Enhanced with list checks (£44)

This is like the enhanced check, but includes a check of the DBS barred lists, and takes about 4 weeks.

Volunteers

DBS checks are free of charge to volunteers who meet the eligibility criteria

This includes anyone who spends time helping people and is:

- not being paid (apart from for travel and other approved out of pocket expenses)
- not only looking after a close relative

A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. It is up to an employer to decide if and when a new check is needed.

Applicants and employers can use the DBS update service to keep a certificate up to date or carry out checks on a potential employee's certificate.

The DBS website has detailed information, helpful reports and guidance on particular topics which are regularly updated.

The DBS also provides information and help via:

- email – customerservices@dbs.gsi.gov.uk
- DBS Helpline 03000 200 190 and minicom 03000 200 192

Definition of Regulated Activity for working with children or vulnerable adults.

What is the definition of Regulated Activity for working with children and young people?

Regulated Activity is activity that you must not do if you are barred from working with children or vulnerable adults

The scope of Regulated Activity for work with children and young people is:

1. Unsupervised activities: teaching, training, instructing, caring for or supervising children, or providing advice / guidance on well-being, or driving a vehicle only for children
2. Work for a limited range of establishments ('specified places'), with opportunity for contact. For example – schools, children's homes, childcare premises (but not work by supervised volunteers)
Work under (1) or (2) is Regulated Activity only if done regularly. In this context, 'regular' means carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period (or in some cases, overnight).
3. Relevant personal care, for example washing or dressing; or health care by or supervised by a professional, even if done once.
4. Registered childminding and foster-carers

Work that was previously Regulated Activity for work with children but will no longer be regulated includes:

- Activity supervised at reasonable level
- Health care not by (or directed or supervised by) a health care professional.
- Legal advice
- "treatment/ therapy" (instead "health care") unless this is "advice/guidance on well-being"
- Work in "specified places" which consists of occasional or temporary services, e.g. maintenance (not teaching etc.)
- Volunteers in "specified places" supervised at reasonable level.
- All "positions" e.g. governors, trustees etc.
- Work carried out by inspectorates

The issue of whether or not activity is considered to be Regulated under the new definition may depend in many cases on whether it is supervised or not. The legal definition of supervision in the Protection of Freedoms Act 2012 states that the supervision should be:

- 'regular'
- 'day to day'
- 'reasonable in all the circumstances for the purpose of protecting the children concerned',
and
- 'carried out by someone who is in regulated activity'

The definition deliberately 'gives local managers the flexibility to determine what is reasonable in their circumstances', and requires individual decisions to be made. To assist

local organisations, the Government is therefore issuing guidance to help managers decide on the level of supervision required in any given situation.

Something to consider

Remember that the question of Regulated Activity affects the types of checks you can seek for any posts, paid or otherwise, that you may recruit to.

If the post does not involve work covered by the definition of Regulated Activity, you will not be able to ask for a barred list on the person you are considering for that role. This check is made as part of the enhanced DBS check on the person.

However, if the post involves work that would have been classed as Regulated Activity under the old definition, you will still be able to ask for an enhanced DBS check, but this check will not include information about whether or not that person is on the barred list. You can also ask for an enhanced DBS check on roles that involve regularly caring, training, supervising or being by yourself and responsible for children. In these situations, 'regularly' is not defined but is commonly taken to mean at least once a month.

Finally

The DBS website has detailed information, helpful reports and guidance on particular topics which are regularly updated.

The DBS also provides information and help via:

- email – customerservices@dbs.gsi.gov.uk
- Disclosure helpline 03000 200 190 and minicom 03000 200 192

<http://www.safenetwork.org.uk/resources/Pages/our-decision-resource.aspx>

Arrangements in Scotland

Disclosure Scotland is the equivalent body to the DBS. Everyone working with young children in Scotland needs an enhanced disclosure including students and volunteers.

Appendix E Code of conduct and professional boundaries

All staff / volunteers working with or coming into contact with children or vulnerable people should behave in accordance with the Code of Conduct and Professional Boundaries. Introduction to this should form part of all inductions whether for paid staff or volunteers.

Projects which The Froebel Trust funds in UK regulated environments, such as nurseries, will have their own safeguarding arrangements and policies. These will take precedent and Froebel will report any incidents in line with their procedures, through our DSP. However, when setting up the project it is important to ask the project/nursery about their arrangements and ask to see their safeguarding policy as well as sharing our policy with them. This places safeguarding firmly in place as part of the initial setting up process and everyone involved is clear and informed.

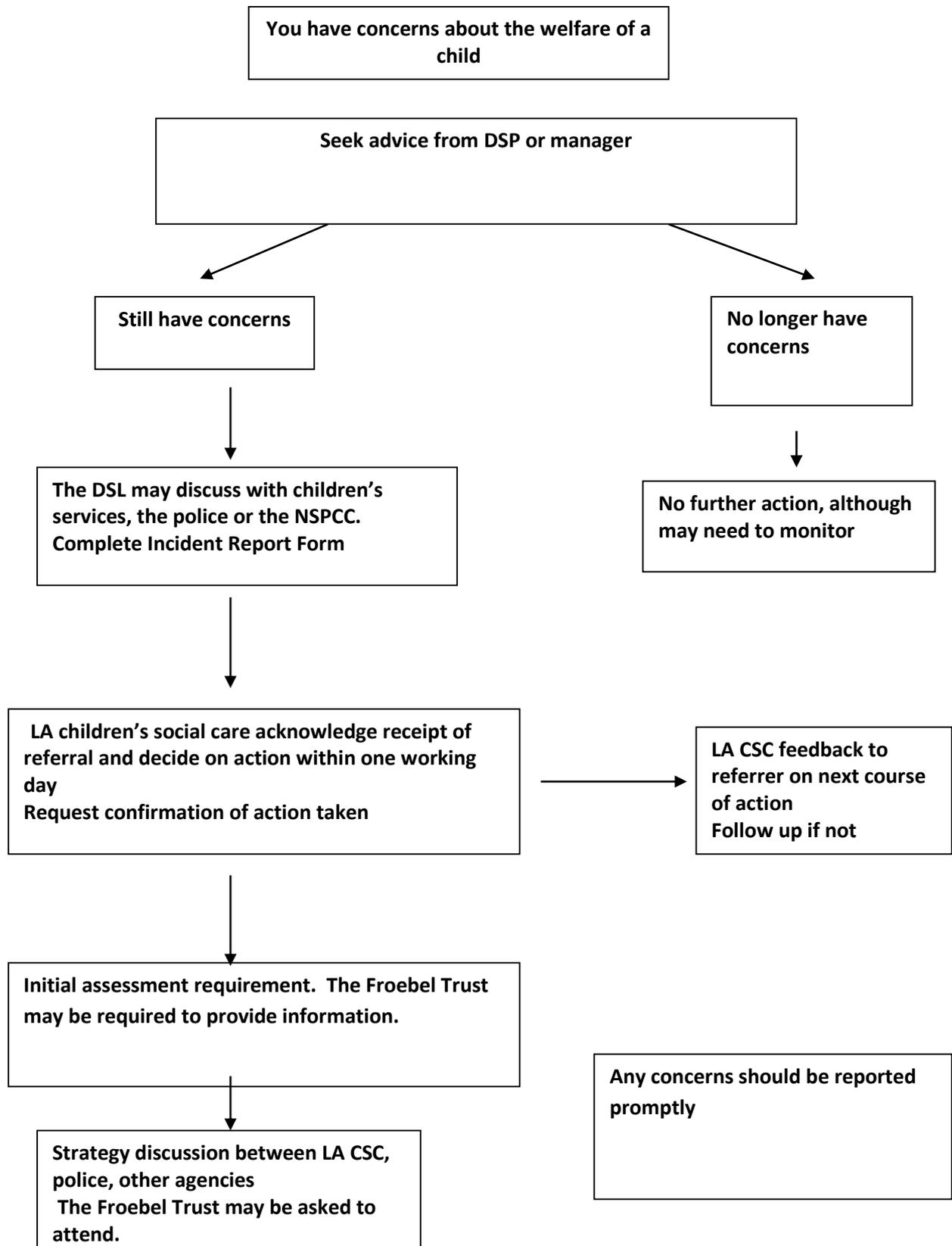
In order to protect children and vulnerable people, and protect staff / volunteers from false accusations, staff / volunteers must...

- Treat all children, young people and vulnerable adults with dignity and respect including respect for their diversity and personal circumstances including family circumstances, health, gender, sexual orientation, race and cultural background or religious beliefs.
- Maintain professional boundaries in all our activities and contact with children or their carers.
- Operate within the safeguarding policy and procedure of The Froebel Trust in order to provide an example of good conduct which reflects our values.
- Respect a family's right to personal privacy and confidentiality; however be honest when it is necessary to break that confidentiality; for example, to protect someone at risk of harm or where the law has been broken.
- Work in partnership with other organisations to ensure that everything possible and reasonable is done to safeguard and promote the health, safety and welfare of children.
- Ensure that situations do not arise where an abuse of trust may occur. This means the avoidance of close personal relationships, sexual or otherwise, with a child or family member.
- Plan activities that take account of particular children's vulnerabilities, including those relating to a disability and/or communication difficulty.
- Avoid jumping to conclusions or making assumptions about others without checking the facts as far as possible.
- Avoid favouritism of any child.
- Ensure that whenever possible there is more than one adult present during activities with children or young people or at least that another member of staff or volunteer is within sight or hearing of others.

- Ensure that parents / carers are the point of contact with children after an event.
- Ensure appropriate safeguards are put in place, if required, to transport children, including seeking consent from parents/carers.
- Ensure appropriate safeguards or consent is in place if taking photographs during activities⁶.
- Be aware that physical contact with a child or young person may be misinterpreted by others, no matter how well intentioned. Avoid engaging in any 'horseplay' with children, such as rough physical, sexually or racially provocative games, or physical affection such as kissing and hugging, nor make sexually suggestive comments about, or to, a vulnerable person.
- There may be occasions where a distressed child needs comfort and reassurance which may include physical comforting such as a caring parent would give. Well intentioned adults should use their discretion in such cases to ensure that what is (and what is seen by others present) normal and natural does not become unnecessary and repeated or unjustified contact, particularly with the same child over a period of time
- Avoid seeking information about a child for which there is no authorisation.
- Report all allegations/suspensions of abuse, neglect or poor practice which might harm children or vulnerable people, using the safeguarding procedure or whistle blowing policy.
- Understand The Froebel Trust's confidentiality policy and when it can/cannot be breached.
- Record in writing any concerns or issues raised about the safety or protection of children, or any concerns about the conduct of individuals towards them.
- Give guidance and support to new staff and volunteers to ensure that they are aware of the responsibilities and behaviours expected by The Froebel Trust.
- Make sure all appropriate checks and processes are completed before you or others commence work with children.

⁶ All photographs taken must positively reflect the activity, culture and image that The Froebel Trust wants to portray and staff / volunteers should be vigilant about the type of photographs that are being taken. No photographs should be taken of children partially clothed or naked. It is essential that no information or photographs are put on websites apart from The Froebel Trust website and that the appropriate consent form is signed either by the child and/or the parent or carer.

Appendix F Reporting child protection concern flowchart



Appendix G Incident reporting form (adapted from Safe Network template)

Safe Network Incident Reporting Form (page 1 of 2)

Private & Confidential Details of the Child and their Parents / Carer:		
Name of Child:		
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	Age:	Date of Birth:
Parent's / Carer's name(s):		
Home address:		
Your Details:		
Your Name:	Your Position:	Date and Time of incident:
Report:		
Are you reporting your own concerns or responding to concerns raised by someone else?		
<input type="checkbox"/> Responding to my own concerns. <input type="checkbox"/> Responding to concerns raised by someone else.		If responding to concerns raised by someone else, please provide their name and position within the club/organisation/group ;
Please provide details of the incident or concerns you have, including times, dates or other relevant information(describe any injuries / whether fact, observation, opinion or hearsay):		
The Child's account (if possible), of what has happened and how:		
Please provide details of the person alleged to have caused the incident / injury including where possible any details:		
Please provide details of any witnesses to the incident(s)		

Safe Network Incident Reporting Form (page 2 of 2)

<p>Private & Confidential Have you spoken to the Parents?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>If yes, please provide details of what was said:</p>	
<p>Have you spoken to the Child?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>If yes, please provide details of what was said:</p>	
<p>Have you spoken to the person the allegations are being made against?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>If yes, please provide details of what was said:</p>	
<p>Further action taken to date:</p>		
<p>Have you informed the statutory authorities?</p> <p>Children’s Social Care: Police [or local organisation/NGO if reporting overseas]:</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No <input type="checkbox"/> No</p>	<p>Please provide the name of the person and his/her contact number:</p>	
<p>Data Protection</p> <p>As the person completing this form, you must notify each person whose information you include about what will happen to their information and how it may be disclosed except to the extent that doing so would prejudice either the prevention or detection of a crime or the apprehension or prosecution of an offender.</p>		
<p>Your signature:</p>	<p>Date:</p>	<p>Time</p>