



Safeguarding Children and Vulnerable Adults Policy

1. Statement of Intent

1.1. Introduction

This policy sets out the principles and procedures for the safeguarding of children and vulnerable adults involved in Bat Conservation Trust (BCT) activity.

BCT believes that it is always unacceptable for a child or vulnerable adult to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults. The arrangements below explain how we will do this.

BCT works with children and vulnerable adults in an education and community outreach environment, via volunteer practical conservation, surveys and education opportunities and through public events such as family fun days, bat walks, conferences, training and fundraising.

This purpose of this policy is

- 1.1.1. to provide protection for the children and vulnerable adults who engage with BCT;
- 1.1.2. to provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or vulnerable adult may be experiencing, or be at risk of, harm;
- 1.1.3. to provide individual staff and volunteers with guidance on working with children and vulnerable adults in order to protect them from accusations of misconduct/abuse; and
- 1.1.4. to protect BCT as a whole and demonstrate our moral and procedural integrity in this area.

1.2. Scope

This policy applies to all BCT staff, including employees, volunteers, and trustees, as well as to agency staff, students or anyone else working on behalf of BCT, e.g. freelance contractors and consultants. Project partners should ensure that safeguarding policies

are in place for the project and that the levels of protection for children and vulnerable adults are at least equal to the levels of protection in this policy.

Bat Groups, which are independent organisations, are made up of many dedicated volunteers and are the mainstay of bat conservation across the country, undertaking vital front-line conservation work. Bat Groups, which choose to use BCT's insurance, must comply with this policy in order to be protected and BCT will have a process in place which allows it to check that compliance is taking place.

1.3. Commitment

We want children and vulnerable adults to enjoy their involvement with BCT and safeguarding is therefore a top priority. We recognise that our contact with children and vulnerable adults may arise incidentally or as a result of targeted interaction. We need to act and be seen to act appropriately at all times.

We recognise that children and vulnerable people have specific needs due to their age, circumstances, medical condition/disability etc., and that they may therefore face barriers to their engagement with BCT, especially in their ability to communicate. We need to take this into account in all of our actions.

BCT is committed to upholding the principle that children and vulnerable adults are entitled to protection from physical, sexual and emotional harm and have the right to a safe, positive and enjoyable environment when involved with BCT.

1.4. Values and principles

- 1.4.1. The welfare of the child/vulnerable adult is paramount
- 1.4.2. All children and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse or exploitation
- 1.4.3. Working in partnership with children and vulnerable adults, their parents, carers and their agencies is essential in promoting people's welfare
- 1.4.4. All allegations, suspicions of harm or abuse and concerns will be taken seriously and responded to swiftly, fairly and appropriately
- 1.4.5. Everyone will work in partnership to promote the welfare, health and development of children and vulnerable adults
- 1.4.6. Our safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and regulatory requirements
- 1.4.7. There is a culture of openness, learning and improvement at BCT

1.5. Definitions

1.5.1. Child/young person - An individual under the age of 18.

1.5.2. Vulnerable adult - A person aged 18 years or over and at risk of abuse or neglect because of their needs for care and support. For example, the person:

- Is an older person who is frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability and/or a sensory impairment
- Has a severe impairment in the ability to communicate with others
- Has mental health needs including dementia or a personality disorder
- Has a long-term illness/condition
- Misuses substances or alcohol
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- Lacks the mental capacity to make particular decisions and is in need of care and support
- Is receiving nursing services/personal care in a care home or at home, medical services, or social care services

This list is not exhaustive.

1.5.3. Abuse - Abuse may be intentional or unintentional. It involves the misuse of power and control that one person has over another, for example:

- Domestic abuse
- Physical abuse
- Sexual abuse
- Psychological abuse
- Modern slavery
- Financial or material abuse
- Neglect and acts of omission
- Self-neglect
- Discriminatory abuse
- Organisational abuse

Many abuses will constitute a criminal offence.

1.5.4. In BCT's care - this means being supervised by BCT staff/volunteers when a parent/guardian/carer is not present. (In general, at public events, BCT does not take responsibility for the care of children and vulnerable adults and if such an occasion occurs BCT will only accept a person into its care when there is a signed, written agreement with a parent/guardian/carer.)

2. **Responsibilities**

2.1. BCT

- 2.1.1. To provide a designated Safeguarding Officer
- 2.1.2. To ensure effective complaints and whistleblowing measures are in place
- 2.1.3. To ensure that BCT provides a safe physical environment for everyone who is involved with its activities and its workplaces by applying health and safety measures in accordance with the law and regulatory guidance
- 2.1.4. To treat all suspicions and allegations of abuse seriously and to respond swiftly, fairly and appropriately

2.2. Safeguarding Officer

- 2.2.1. Has responsibility for receiving concerns about the safety and welfare of children and vulnerable adults
- 2.2.2. Makes decisions about what actions need to be taken, contacting and liaising with other agencies involved in safeguarding children and vulnerable adults as appropriate
- 2.2.3. Ensures that confidential, detailed and accurate records of all safeguarding concerns/allegations are maintained and securely stored
- 2.2.4. Maintains an overview of all concerns, including details of action taken and, where possible, the outcomes
- 2.2.5. Reports cases (anonymized where relevant) for review at Senior Management Team meetings
- 2.2.6. Reports any significant safeguarding incident or concern to BCT's Board of Trustees
- 2.2.7. Has strategic responsibilities and is responsible for ensuring this policy and the arrangements are implemented
- 2.2.8. Reviews this policy annually and as required by changes in legislation and/or government guidance and by the Disclosure & Barring Service, or other appropriate authorities, ensuring it is up-to-date and fit for purpose
- 2.2.9. Ensures staff and volunteers have read and understand this policy (delegating to relevant managers/supervisors as appropriate)
- 2.2.10. Promotes safeguarding and provides guidance and advice to staff where needed
- 2.2.11. Ensures that safeguarding issues and consequences arising from investigations are communicated to relevant staff members (unless confidentiality prevents this), so that informed decisions on future activities can be made

In the event that the Safeguarding Officer is not available, individuals with concerns regarding the safety of children or vulnerable adults should follow organisational procedures for alternative contact.

At current time Safeguarding Officer responsibilities are designated to:

Head of Operations – Peter Crome
Phone 020 7820 7170
Email pcrome@bats.org.uk

Where BCT is working in a project partnership, Safeguarding Officer responsibilities may be designated to the lead partner in the project.

Bat Groups, which use BCT's insurance, must ensure Safeguarding Officer responsibilities are designated within the Group and that complaints and whistleblowing measures are in place within the Group.

2.3. All staff (including others as described in paragraph 1.2)

Whilst the Safeguarding Officer has specific safeguarding responsibilities, **all staff who have contact with a person thought to be at risk of abuse have a responsibility to act on their concerns.** When an individual is at immediate risk of harm or abuse, the priority is for their health, safety and welfare and incidents should be reported to the appropriate authority, e.g. the Police, without delay.

Staff who are unsure about whether something they have witnessed or heard is a safeguarding matter should seek advice from the Safeguarding Officer.

All staff should be aware of the common signs and symptoms of abuse and be prepared to report these so that the appropriate authorities, such as the Police and Social Services, can investigate them. See HM Government's "What do if you're worried a child is being abused" and "Signs of Abuse" in BCT's Safeguarding section of the server.

3. Arrangements

This section outlines what BCT will do to keep children, young people and vulnerable adults safe. The arrangements apply to everyone mentioned in paragraph 1.2.

3.1. Planning activities

- 3.1.1. For activities, ensure health and safety requirements and risk assessments are appropriate and implemented
- 3.1.2. Where possible make sure children and vulnerable adults are accompanied by their own adult carers (In general, at public events, BCT does not take responsibility for the care of children and vulnerable adults and if such an occasion occurs BCT will only accept a person into its care when there is a signed, written agreement with a parent/guardian/carer)
- 3.1.3. Ensure that a signed parent/guardian consent form has been obtained if you are providing direct supervision
- 3.1.4. Avoid inappropriate activities and material; think about the age, maturity and ability of any children/young people/vulnerable adults, so that they can understand and participate safely

3.2. Awareness

- 3.2.1. Share information about safety issues and safeguarding best practice with children, parents, staff and volunteers
- 3.2.2. Be alert to potential harm or inappropriate behaviour by others to children and vulnerable adults in your care
- 3.2.3. Provide access for children and vulnerable adults to talk to another adult about any concerns they may have

3.3. Code of Conduct

- 3.3.1. Do remember you are a role model and should listen, show respect and understanding for others
- 3.3.2. Do bear in mind that some actions, no matter how well-intentioned, may easily be misinterpreted
- 3.3.3. Do use appropriate language, gestures and posture/body language
- 3.3.4. Do respect an individual's right to privacy unless you feel they are at risk of harm
- 3.3.5. Do not rely on your good name to protect you
- 3.3.6. Do not show favouritism or get drawn into inappropriate attention seeking behaviour (e.g. tantrums or crushes)
- 3.3.7. Do not allow or engage in suggestive remarks, gestures or touching which could be misunderstood
- 3.3.8. Do not do anything to undermine BCT's (or your Bat Group's) reputation for providing children and vulnerable adults with a safe environment
- 3.3.9. Do not jump to conclusions about others without checking the facts
- 3.3.10. Do not develop any form of relationship with children/young people/vulnerable adults, which could in any way be deemed inappropriate or exploitative
- 3.3.11. Do not act in ways that may be abusive or place children/young people/vulnerable adults at risk of abuse
- 3.3.12. Do not use language, make suggestions or offer advice (in person or online), which is offensive or abusive
- 3.3.13. Do not allow children/young people/vulnerable adults with whom you are working to stay overnight at your home without a parent/guardian/carer
- 3.3.14. Do not condone, or participate in the behaviour of children/young people/vulnerable adults, which is illegal, abusive or unsafe

- 3.3.15. Do not intentionally act in ways intended to shame, humiliate or degrade children/young people/vulnerable adults
- 3.3.16. Do not undertake any other action that could compromise the rights, safety or welfare of children/young people/vulnerable adults

3.4. Supervision

- 3.4.1. Be aware of the DBS Check Guidance Note available with this Policy
- 3.4.2. Arrange for an appropriate ratio of adults to be present, bearing in mind the activity, number, ages and any particular needs of the individuals, in line with best practice
- 3.4.3. Have a minimum of two adults when working with small groups
- 3.4.4. Meetings with individuals should take place as openly as possible (ideally with more than one responsible adult present in the room or with an open door to allow visual contact by another responsible adult)
- 3.4.5. Have male and female helpers where practical
- 3.4.6. Where children and vulnerable adults are in your care (see 1.5.4), make sure you know which children and vulnerable adults they are, the extent of your responsibility, where they are and what they are doing
- 3.4.7. Avoid being left alone with a child or vulnerable adult, e.g. 'one-to-one' car journeys, unless it is an emergency
- 3.4.8. If one-to-one contact is unavoidable make sure it is for as short a time as possible, ensure you are accessible to others, tell someone else where you are going, what you are doing and why; and always with the full knowledge of another responsible person and the individual's parent/guardian

3.5. Recruitment

BCT will follow best practice in safe recruitment:-

3.5.1. Selection:

- All applicants will complete an application form
- Shortlisted applicants will be asked to attend an interview
- Shortlisted applicants will be asked to provide references and these will always be taken up prior to confirmation of an appointment
- Job/role advertisements, descriptions and person specifications should make clear where posts may involve working with children or vulnerable adults and where they will require a Disclose and Barring Service (DBS) check or Protecting Vulnerable Groups Scheme (PVG) Scheme check in Scotland. See separate DBS Check Guidance Note.

3.5.2. Screening:

- Successful applicants appointed into positions where working with children, young people or vulnerable adults is required will have their criminal records

checked at the appropriate level prior to the applicant taking up their post.
See DBS Check Guidance Note.

3.6. Training

- 3.6.1. All staff and volunteers will receive an introduction to safeguarding in their induction
- 3.6.2. Formal safeguarding training will be given at the appropriate level and as relevant to roles, to support the arrangements in this policy; where there is regular, direct and unsupervised contact with children, young people or vulnerable adults, safeguarding training will be mandatory and refreshed annually
- 3.6.3. Systems will be in place to ensure all those receiving training have understood the policy and procedures

3.7. Safeguarding & Our Supporters

- 3.7.1. BCT fundraising is carried out in line with the latest guidance provided in the Institute of Fundraising Guide – ‘Treating Donors Fairly’ - Responding to the needs of people in vulnerable circumstances and helping donors make informed decisions <http://www.institute-of-fundraising.org.uk/library/treatingdonorsfairly/>
- 3.7.2. BCT will provide best practice guidance for our face to face fundraisers regarding vulnerable people or those in vulnerable circumstances
- 3.7.3. BCT will ensure that we do not send fundraising requests to donors that have been identified as vulnerable or in vulnerable circumstances
- 3.7.4. BCT will always consider making a refund to a donor that is either found to be or reports themselves that they are vulnerable or in vulnerable circumstances at the time of donation
- 3.7.5. BCT will ensure that agencies working on our behalf have a policy and training in place regarding vulnerable donors and donors in vulnerable circumstances

3.8. Responding to abuse, suspected abuse and disclosures of abuse

If you have concerns about a child/young person/vulnerable adult or someone discloses that they are being abused, then upon receiving the information you should:

- react calmly
- reassure the individual that they were right to tell you and that they are not to blame and take what they say seriously
- allow them to speak freely
- do not trivialise the issue being discussed
- only ask questions to clarify the situation, do not probe or interrogate so as to investigate the allegations
- reassure but do not promise confidentiality, which might not be feasible in the light of subsequent developments
- inform the individual what you will do next

- make a full and written record of what has been said/heard as soon as possible – see paragraph 3.9
- inform the Safeguarding Officer

If the Safeguarding Officer (or another senior manager if the Safeguarding Officer is not available) considers the individual concerned is in immediate danger, or there has been a crime committed (e.g. you witness physical abuse), contact must be made with the emergency services and/or the appropriate authorities (parents/social services) to help ensure the individual does not remain in an unsafe environment. A full detailed record must be made (see paragraph 3.9).

Remember, if you witness an assault, crime, or act of abuse the priority is the immediate health, safety and welfare of the individual and you should contact the Police.

3.9. Record keeping of suspected abuse

- 3.9.1. A written record, marked 'confidential', should include the following details and can be sent electronically to the Safeguarding Officer by the person reporting the incident/concern:
 - 3.9.2. Name of person making the report stating whether or not they are expressing their own concerns or those of someone else
 - 3.9.3. Line manager/supervisor
 - 3.9.4. Name of child/young person/vulnerable adult
 - 3.9.5. Name of parent/guardian/carer
 - 3.9.6. Date of birth
 - 3.9.7. Address and telephone number
 - 3.9.8. First language
 - 3.9.9. Date, time and place of incident/when concern arose
 - 3.9.10. How the concern was identified (alleged or reported by child/vulnerable adult; alleged, reported, suspected or witnessed by someone else; suspected or witnessed by self; other)
 - 3.9.11. Details of other people involved/alleged to be involved
 - 3.9.12. Summary of incident/concern (if you include statements by other parties try to use their words in quotations; include details of all alleged perpetrators and details of any immediate protection made)
 - 3.9.13. Details of any physical injuries reported or witnessed (including description of any visible injuries and any indirect signs such as behavioural changes)
 - 3.9.14. Names of any witnesses
 - 3.9.15. Have parents/carers been contacted? (details of any discussion)

3.9.16. Were emergency services involved? (E.g. taking child to A&E, Police etc.) (where possible, referral to the Police or Social Services or LA Safeguarding Team should be confirmed in writing within 24 hours and the name of the contact who took the referral should be noted)

3.9.17. Details of any advice given and any action taken

4. Law and guidance supporting this policy

This policy has been drawn up on the basis of law and guidance, namely:

- Children Act 2004 (geographical extent: E+W+S+NI)
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998 (geographical extent: E+W+S+NI) (N.B. This law will be replaced by General Data Protection Regulation on 25/05/18)
- Human Rights Act 1998 (geographical extent: E+W+S+NI)
- Sexual Offences Act 2003 (geographical extent: E+W+S+NI)
- Safeguarding Vulnerable Groups Act 2006 (geographical extent: E+W+S+NI)
- Protection of Freedoms Act 2012 (geographical extent: E+W+S+NI)
- Children and Families Act 2014 (geographical extent: E+W+S+NI)

It reflects policy, procedure and guidance at Lambeth Council, in which local authority area BCT's head office is located. Full details are located at:

<https://www.lambeth.gov.uk/social-support-and-health/abuse-and-violence/safeguarding-and-adult-abuse-guide>

<https://www.lambeth.gov.uk/social-support-and-health/abuse-and-violence/together-we-can-tackle-child-abuse>

It also reflects the Government's campaign to tackle child abuse. The "If you think it, report it" campaign literature raises awareness of the role we all play in protecting children from abuse and neglect. Details on spotting the signs of neglect/abuse and the steps you can take to report it can be found here:

<https://tacklechildabuse.campaign.gov.uk/>

This policy is supported by the following BCT policies and guidance:

- Whistleblowing Policy
- DBS Check Guidance Note
- Volunteer Policy
- Equal Opportunities Policy
- Anti-Harassment Policy
- Child Photo/Video Consent Form
- Helpline guidance on dealing with persons under 18 years of age
- Direct Supervision Consent Form
- Supervision ratios Guidance Note

All of the above policies and guidance can be found in BCT's Staff Handbook and relevant documents will be shared with Bat Groups and project partners.

5. Allegations against members of staff and volunteers

As well as protecting those in BCT's care, safeguarding arrangements are in place to also maintain the integrity of the organisation. We recognise that allegations which involve a member of staff or volunteer are potentially serious enough to cause significant reputational damage to BCT (as well as to the individuals involved). Safeguarding arrangements therefore ensure that members of staff and volunteers are protected from the risk of suspicion or allegation of abuse.

For the above reasons, safeguarding is included in BCT's Risk Register. Regular reviews of the Risk Register by the Senior Management Team will ensure that controls and work to improve the controls are in place to reduce the risk. The Board of Trustees reviews the Risk Register on an annual basis.

If an allegation is made against a member of staff or volunteer, he or she will be made aware of their rights under employment legislation and internal policies and procedures. BCT will take expert HR advice from the outset. BCT's disciplinary procedures set out the rights of staff where an allegation of abuse is made and how BCT will respond.

The first priority is always to ensure the safety and protection of a child or vulnerable adult at risk. However, BCT will support staff or volunteers who are subject to a complaint or allegation which is subsequently not substantiated or not proven.

BCT employees have access to free confidential advice and support through the Employee Assistance Programme.

6. Confidentiality

Every effort must be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only with information stored in a secure place.