

# Safeguarding Policy

## Policy Statement

The Reading Agency are working towards a world where everyone is reading their way to a better life. We believe that reading can tackle life's big challenges, from social mobility to mental health - and we are determined that no one is left behind as we strive towards realising our vision.

Through our programmes and partnerships we reach children, young adults, prisoners and older people of all ages economic background.

The welfare of children, young people and adults at risk is of paramount importance and all have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religious belief or age.

Through the application of our policy and procedures, The Reading Agency promotes the safety, welfare and well-being of all children, young people and adults at risk enabling them to participate in our programmes, events or engage in a safe and inclusive way.

This purpose of this policy is to:

- Protect children and young people and adults at risk who take part in our programmes, events or engage with our work in any way.
- Provide guidance to our workers as well as children, young people, adults at risk and their families, with the overarching principles that guide our approach to safeguarding.

We will seek to keep children, young people and adults at risk safe by:

- Valuing, listening to and respecting them
- Appointing a nominated lead for safeguarding along with a lead trustee
- Adopting safeguarding best practice through our policies and procedures for staff and volunteers
- Developing and implementing an effective online safety policy and related procedures
- Providing effective training so that all workers know about and follow our policies and procedures confidently and competently
- Recruiting safely to ensure all necessary checks are made
- Recording, storing and using information professionally and securely, in line with data protection legislation

## Scope

This policy applies to anyone working on behalf of The Reading Agency, including senior managers and the board of trustees, paid staff, freelance workers, authors and volunteers.

## Context

The Reading Agency's workers may occasionally have direct contact with children, young people and adults at risk through our programmes, examples include:

- Special reading events organised in partnership with others
- Working directly with participants to plan and develop events and promotions
- Consulting participants about library services, reading, projects and programmes
- Questioning and surveying participants for project evaluations
- Interacting with participants through our websites and social media

However, most of our work is delivered in partnership with libraries, schools, colleges and other partner organisations and we will take steps to ensure our workers do not have unsupervised contact with children, young people, and adults at risk.

We will also ensure that we undertake a DBS check on all staff who work with children, young people and adults at risk through our programmes and may also undertake DBS checks on other staff members if deemed appropriate.

### **Contact details:**

Nominated Safeguarding Lead: Karen Napier, CEO

Nominated Safeguarding Lead Deputy: Emma Braithwaite, Head of Skills and Engagement

Nominated Safeguarding Lead Deputy: Gemma Joly, Head of Health and Wellbeing

Trustee/Senior Safeguarding Lead: Zoinul Abidin

NSPCC Helpline 0808 800 5000

### **Monitoring and review**

This policy is the responsibility of all workers who have contact with children, young people or adults at risk and their managers and it will be reviewed every year.

### **Code of practice**

This code of practice applies to all contact with children, young people, and adults at risk by The Reading Agency's workers – staff, freelancers, board members, volunteers, authors:

- Plan so that there is no unsupervised contact by ensuring that children, young people and adults at risk are supervised by at least one other responsible adult (e.g. parent/carer, teacher, librarian, group leader)
- Be clear who is responsible for safeguarding at an event/meeting and put it in writing
- Ensure a risk assessment is carried out and any arising actions are addressed
- Avoid physical contact with children, young people, and adults at risk except, in exceptional cases, for reasons of health and safety
- Ensure that all collection, processing, storage and sharing of personal data by The Reading Agency complies with the Data Protection Act 2018 and other applicable legislation.
- Ensure website safety through clear sign-up process and usage rules, along with regular reviewing and moderating of user content and comments.

### **Managing Risk**

A risk assessment should be carried out for any contact with children, young people and adults at risk.

The risk assessment form helps to assess risk and prompt any action required to ensure an individual's protection.

The Reading Agency has a responsibility to ensure that workers in contact with children, young people and adults at risk are not placed in situations where abuse might be alleged.

Workers should not find or place themselves in situations where there are unsafe equipment or materials, inadequate partner staff support, or work for which they do not have enough training or experience. Project planning should ensure the skills of the worker match the needs of the situation.

You will find a risk assessment form and prompt sheet in [Appendix 1](#)

Please send completed risk assessments to your line manager for checking and the HR Manager for archiving.

## Protocols

### 1. Events and meetings

Most of our contact with children, young people and adults at risk is through partner organisations such as local authority library services, community groups and prisons and we expect these project delivery partners will observe statutory requirements and good practice on safeguarding.

When attending an event externally that has been arranged through a partner organisation:

- Confirm appropriate policies are in place and include this where appropriate in a partnership agreement
- Complete a risk assessment with the partner organisation and confirm in writing that they will be the lead body for safeguarding on the project
- Agree who has primary responsibility for safeguarding – this should be the responsibility of the organisation being visited
- Ensure at least one member of staff from that organisation is present at all times
- Ensure at least two members of staff from The Reading Agency attend and that staff have appropriate level of DBS checks.
- Any concerns should be reported to the designated safeguarding person at that venue, who will undertake the necessary response

Where working directly with children, young people and adults at risk, The Reading Agency's programme manager must ensure that:

- A risk assessment is carried out in advance
- Appropriate action is taken to mitigate the identified risks
- Staff supporting the event have appropriate levels of DBS checks
- Staff responsible for chaperoning children are DBS checked.
- Any necessary consent forms have been completed
- Contact details are recorded for each child attending without a parent or parent-nominated minder
- Any personal data collected is processed in line the Data Protection Act 2018 and other applicable legislation
- First aid equipment and support are available in case of an emergency
- All children, young people and adults at risk have left safely after the event
- Any accidents/incidents are recorded

### 2. On-line safety

The Reading Agency recognises that the use of information technology is an essential part of all our lives. As an organisation we use IT to gather and store information, and to communicate with each other.

It is also an intrinsic part of the experience of our children, young people, and adults, and is greatly beneficial to all. However, it can present challenges in terms of how we use it responsibly and, if misused either by an adult or a young person, can be actually or potentially harmful to them.

As an organisation we will:

- Ensure all workers who have on-line contact with children, young people or adults at risk are DBS checked
- Ensure that the personal information of staff, volunteers and service users remain confidential
- Only use official email accounts provided via the organisation
- Provide staff and volunteers with guidance on our approach to e-safety, through supervision, support and training
- Ensure clear rules are in place for website users along with clear instructions on how users raise concerns about the website.
- Operate in line with our values and within the law in terms of how we use information technology
- Undertake a risk assessment for any new online activities and make any necessary amendments
- For online events, follow the guidance outlined in the [Libraries Connected Safeguarding for online events toolkit](#)

### **Children's Website**

We will take these additional steps for our children's website:

- Ensure we have parental consent for children signing up to our children's website
- Ensure our children's website is fully moderated
- Ensure we have a basic DBS check and character reference for all moderators to ensure suitability. The Reading Agency will cover the cost of DBS checks
- Provide clear moderator guidance and require moderators to take an introductory test to check their understanding of our rules and safeguarding procedures
- Support and encourage children and young people to use our sites in a way that keeps themselves safe and shows respect for others
- Support and encourage parents and carers to do what they can to keep their children safe online
- Regularly review website filters for chat/review functions to ensure users cannot submit messages/reviews containing personal information or offensive words.

### **3. DBS Checks**

We will undertake DBS checks for staff and freelancers working on our children, young people, adult and health programmes.

If the work you do requires a DBS check, we will advise you how to make an application. If you have a DBS check and have subscribed to the DBS Update Service, we will ask the permission to view the DBS check online and record the details on your HR file. We will not usually require a new DBS check.

If you have a DBS check that is less than 18 months old from a previous employer, we will record details of the disclosure on your HR file and carry out our own check within the first 3 to 6 months of your contract.

Workers joining The Reading Agency who do not have a previous DBS check will be allowed to work on projects but must not have unsupervised contact until their application has been processed.

The person with responsibility for DBS checks for The Reading Agency is the HR Manager.

#### **Renewal of DBS checks**

DBS checks do not carry an expiry date so The Reading Agency will review DBS checks every three years and, for convenience, we recommend employees sign up for the DBS Update Service when applying for a DBS check.

In the interim, if anything happens that you think may affect the validity of your DBS check you must inform the Finance, Commercial and Business Director immediately.

### **Disclosure**

Workers who disclose that they have been convicted of any offence relating to children/young people or adults at risk, or any related disciplinary sanction will not be permitted to work on any event which involves contact with children, young people and adults at risk.

### **Managing Safeguarding Incidents**

If a safeguarding incident occurs, prompt action will be taken within 24 hours of the disclosure.

The Designated Safeguarding Lead (or deputy) will be informed and, in most instances, the matter will be referred on to the appropriate agency to support the child, young person or adult with next steps. If there is an immediate risk of harm then the emergency services will be alerted.

An incident report will be completed with succinct, factual information about the issue, the action taken and the outcome of the incident. Any incident reports will be held by the Designated Safeguarding Lead.

The organisation will review safeguarding incident reporting annually and report to the Board on any safeguarding incidents arising.

### **Handling a disclosure**

The recommended actions for handling a disclosure from a child, young person or adult at risk are similar. However the approach needs to be adjusted depending on circumstances.

At all times staff should ensure that they are never alone with a child, young person or adult at risk and should not go into a private room unless accompanied by a parent or another member of staff.

Actions to be taken:

- Find a suitable location to discuss
- Listen carefully, take seriously what is being said, let the child, young person or adult at risk describe what happened at their own pace, only asking questions for clarification
- Remain calm and caring and avoid interpreting information
- Reassure but do not make promises of confidentiality or secrecy. Tell the child, adult at risk there will be a need to share this information but make it clear that only people who need to know and who can help will be told.
- Reassure them that they did the right thing in telling you
- Keep appropriate confidentiality (e.g. not to share or discuss with colleagues)
- Using the child's/adult's own words, complete a [Safeguarding Incident Report Form](#) as soon as possible after the disclosing conversation and sign and date this record.
- Inform the Designated Safeguarding Lead or one of their deputies

Actions to avoid:

- Do not dismiss the concerns, or allow any shock or distaste to show
- Do not probe, over pressure or attempt to conduct an inquiry into what has happened
- Avoid cross-questioning, excessive or leading questions
- Do not speculate, make assumptions or make negative comments about the allegation or promise confidentiality
- Do not suggest any actions that may be undertaken in response to the disclosure

## **Managing allegations**

If a safeguarding allegation is made regarding a worker of The Reading Agency, or if there is concern about a relationship with a child, young person, or adult at risk we will act quickly and effectively to investigate within 24 hours of the matter being raised.

Any allegation should be reported to the Nominated Safeguarding Lead, who will involve the relevant local organisation (e.g. school, library, Local Authority Designated Officer).

Additional guidance for managing any allegation against a member of staff can be found in [Part 4 of Keeping Children Safe in Education](#).

The worker will be made aware of the allegation and his or her rights under both employment law and internal disciplinary procedures by the Designated Safeguarding Lead.

Whilst the investigation is carried out, the worker will usually be allowed to continue to work but contact with children, young persons or adults at risk will be prohibited. A decision may be taken to suspend the worker.

## **Supporting documents**

This policy statement should be read alongside other relevant organisational policies, procedures, guidance and other related documents, including:

- Complaints Policy
- Data security and GDPR Policy
- Whistleblowing Policy
- Consent for filming/photography – see Appendix 3 below
- Transporting children – see Appendix 4 below

### Risk Assessment Form

Project Name:

Project Leader:

Date Produced:

Participants:

Event Details:

	Risks	Probability	Impact	Actions to reduce probability and/or impact	Due date	Owner
1						
2						
3						
4						

### Risk Assessment Prompt Sheet

Issue	Response	Action if required
Are you working in a room with other adult supervision?	Yes/no	
If you may have unsupervised contact with children, young people and adults at risk, do you have an enhanced DBS check?	Yes/no	
Does the organisation you are working with have a safeguarding policy?	Yes/no	
Is it clear who is responsible for the children, young people and adults at risk during contact time?	Yes/no	
Do you have contact with children or young people for more than 2 hours in one day?	Yes/no	
Will you meet with this group of children or young people more than 3 times?	Yes/no	

**Appendix 1: Risk Assessment Form**

Will The Reading Agency be holding any information on the children, young people and/or adults at risk?	Yes/no	
Does The Reading Agency have a partnership agreement with the organisation you are working with?	Yes/no	
Will you be using photography/film/video/ recordings or live broadcast and has the appropriate consent been sought?	Yes/no	
Will you be storing the consent forms? What is the retention policy?	Yes/no	
Health and safety. Are there any risks that you can see in the space/activities planned for the children, young people and adults at risk?	Yes/no	
Are there any other follow up actions you are aware of that you need to take?	Yes/no	
If you are using your own vehicle for transporting children, young people or adults at risk, ensure you read and comply with the guidance set out in <a href="#">Appendix 4</a>	Yes/no	

**Please copy the risk assessment and prompt sheet to your line manager and The Reading Agency's HR Manager**



### Safeguarding Incident Report Form

Name of Individual Concerned
Date of Birth
Address
Name of Person Reporting Incident
Position
Date/Time of Incident
<b>Details of Incident (Be brief and factual)</b>
<b>Record below the actual words the child or adult said when telling you about the incident.</b>

**Appendix 2: Safeguarding Incident Report Form**

Who did you report this to?	
Name:	Date and Time:
<b>Social Services</b>	
Name:	Date and Time:
<b>Other</b>	
Name:	Date and Time:
<b>What action was taken- Please list below</b>	
<b>Action</b>	<b>Outcome</b>
Has all the information given to 3rd party been confirmed in writing?	
Yes/No? If yes, when was this done?	Date and Time:
Has a Referral form been sent to Local Authority?	
Yes/No? If yes, when was this done?	Date and Time:
Has this incident been discussed with the Designated Safeguarding Lead or Deputy?	
Yes/No? If yes, when was this done?	Date and Time:
Signed:	Date and Time:

## Photography and filming

Any photographs of video/film footage for possible publication or online use must put the welfare of the child, young person or adult at risk at its centre. This means that either:

- Photographs should be composed so that recognition of individual faces is impossible, or
- Individual consent must be obtained for the photograph/film to be published in the agreed formats and for specified purposes (parent's or guardian's consent required for under 18s)

Completed consent forms must be stored securely and should be destroyed when the photographs are no longer used

You will find a sample consent form below:

### Consent form concerning the use of photographs

Name/Name of child: \_\_\_\_\_

The Reading Agency would like to photograph/film you and/or your child for promotional purposes  
<details of event>

The photos may be on our websites, in our printed publications and on our Facebook page. They may also be used on the websites of our partners and in other press and publications across the UK.\*

Please note that websites can be seen throughout the world, and not just in the United Kingdom, where UK law applies.

To comply with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and other related legislation, we need your permission to take photographs of you and/or your child during the event.

#### Declaration

I give permission for **me and/or my child** to be photographed and filmed by The Reading Agency for the purposes mentioned above.

I have read and understood the conditions of use.

I understand I can withdraw consent at any time by emailing [info@readingagency.org.uk](mailto:info@readingagency.org.uk). Please note that this will not apply to material that has already published.

Signature of parent/guardian \_\_\_\_\_

Name of parent/guardian \_\_\_\_\_ Date: \_\_\_\_\_

#### Conditions for use:

1. Any image taken or information you provide will not be used for any other purposes, or by any other organisation
2. We will not include details or full names (which means first and surname) of any persons in an image on our website, or in printed publications, without good reason. For example, we may include the full name of a competition prize winner if we have their consent.
3. We will not include personal contact details of any persons in an image on our website or in printed publications.

\* Include details of websites if possible

### Interviews

#### Interviews in school time

- Parent or guardian must know in advance about their child's broadcast.
- If interviewing a child through a school, the head teacher is empowered to give parents details of the broadcast and sign a consent form on their behalf. In loco parentis.
- If the subject is particularly contentious or sensitive, written parental consent will be needed in addition to that of the head teacher.
- Before recording always check the child is happy to proceed and respect their wishes if they change their mind.
- If you visit a school, ensure the head teacher has a written agreement which sets out the respective responsibilities of school and The Reading Agency for safeguarding children and health and safety.
- Complete a risk assessment – whether you are visiting a school, or the children are visiting library premises.
- Ensure you have consent forms and, in line with Data Protection Act 2018 and other applicable legislation, ensure you store them securely and shred them when they are no longer needed.

#### Interviews out of school hours

- If children are interviewed out of school hours through a club or parents, individual written parental consent is required for each child. Unlike head teachers, club organisers cannot represent parents.
- Accompanying adults – be they teachers/parents/club leaders – must stay on site for the duration of the broadcast.

#### Security – ensure the safety of the young person's identity

- On air, never give out information which would link a child to a particular address or venue at a particular time. Beware of jigsaw identification during the course of a programme!
- Never leave children's personal details lying around and, in line with the Data Protection Act 2018 and other applicable legislation ensure you store them securely and shred them when they are no longer needed.

#### Performance licences

- Performance licences may apply to children of 16 years and under in full time education who have done a 'performance'. Young adults of 17 and over do not need a performance licence.

## **Transporting Young People Guidance**

You should not transport young people by car unless absolutely necessary and you should not transport anyone under the age of 8. However, if you need to transport someone by car, you must abide by the Highway Code and the following:

- You may only transport children and young people in your car with the prior written consent of their parents/carers.
- Your car must have modern seat belts. Seat belts which cover the lap only are not suitable.
- Children up to 135 cm in height or 12 years old, whichever comes first, must use an appropriate child restraint (e.g. a modern, safe booster seat plus safety belt) when travelling in cars.
- Make sure anyone under 16 sits in the back of the car
- You must be over 25 and have held a full driving licence for over two years.
- You must not drive with young people if you have an unspent conviction for drink driving, dangerous driving.
- You must not drive with young people if you have 6 points or more on your licence.
- Your car must be comprehensively insured and insured for business use. You will need to inform your insurance company and check that your insurance will cover you for giving lifts.
- Your car must be in a clean and in a roadworthy condition.
- You should always have a non-driving adult escort with you in the car. If this is not possible, try to ensure that there is at least one other young person in the car.
- If the young person is known to have a disability or special need, consider whether you need a non-driving adult in the car, sitting in the back, behind you, with the young person in the seat beside him or/her.
- If in an emergency you have to transport one young person on your own, the young person must always sit in the back of the car.
- Do not drive the young person to your house
- Inform The Reading Agency that you will be transporting young people