

PAPER BOAT SAFEGUARDING POLICY & PROCEDURES

It is recognised that safeguarding national and international guidance provides very clear direction for all organisations involved in the care, welfare and protection of children and young people and this manual is founded on those principles and guidance. The Paper Boat safeguarding manual is designed to provide the Paper Boat community with a step by step instructional guide as to their responsibilities regarding safeguarding and what you must do if you recognise or learn of a concern. The manual should be read in conjunction with national & international guidance, together with legislation relevant to your location and broader Paper Boat policy.

Paper Boat is an international non-governmental organisation with clear values and principles operating with some of the most vulnerable children globally and as such the safeguarding of children is at the very centre of our focus. It is both a fundamental belief and duty of the organisation to focus on the prevention of child abuse and exploitation, whilst also advocating child protection in all that we do.

Abuse of children and vulnerable people occurs in many different forms throughout all communities and cultures. As an organisation we find our work often takes place in environments where people might be considered to be at their most vulnerable, due to poverty, displacement and an inability to access basic human rights. These environments and circumstances can augment the vulnerability of children increasing the opportunities for abuse to occur. Within our supported global locations the beneficiaries are children under the age of 18 and who are the focus of this policy.

As a member of the international nongovernmental community Paper Boat recognises its responsibility to protect children, its employees, volunteers and partners organisations from those who may use its work to assist them in the abuse and exploitation of children.

This policy is divided into two parts; being a statement of intent and the associated mandatory procedures which assist and guide Paper Boat representatives in identifying and dealing with any concerns that arise which bring into question the safeguarding of children who come into contact with representatives of our organisation.

Paper Boat **values and principles**

Our vision is of **'a world that unlocks the infinite potential of every child'** – we work towards this vision by partnering with international child support organisations. Alongside our partners our purpose is **'to listen to young people – inspiring and enabling them to change their world'** and our mission is **'to establish playful and creative learning spaces at the heart of communities through innovative partnerships'**

Our three core values of Courage, Creativity and Collaboration inform our guiding beliefs which underpin all of our work with children:

- We believe that young minds are at their most imaginative when children feel safe and loved
- We believe that children bring fresh minds and new ideas to the toughest problems
- We believe that learning is collaborative and calls for critical curiosity

We work with our partners and local communities to set up and support creative learning spaces for children and young people – helping to inspire greater confidence in children and enabling them to bring creative solutions to their world. We also support our partners and local communities to build and nurture stronger child-centric communities – where all children and adults promote and protect the rights of children.

Through our partnerships we seek to...

- Meet children's needs where they are, helping to build resilient communities and families

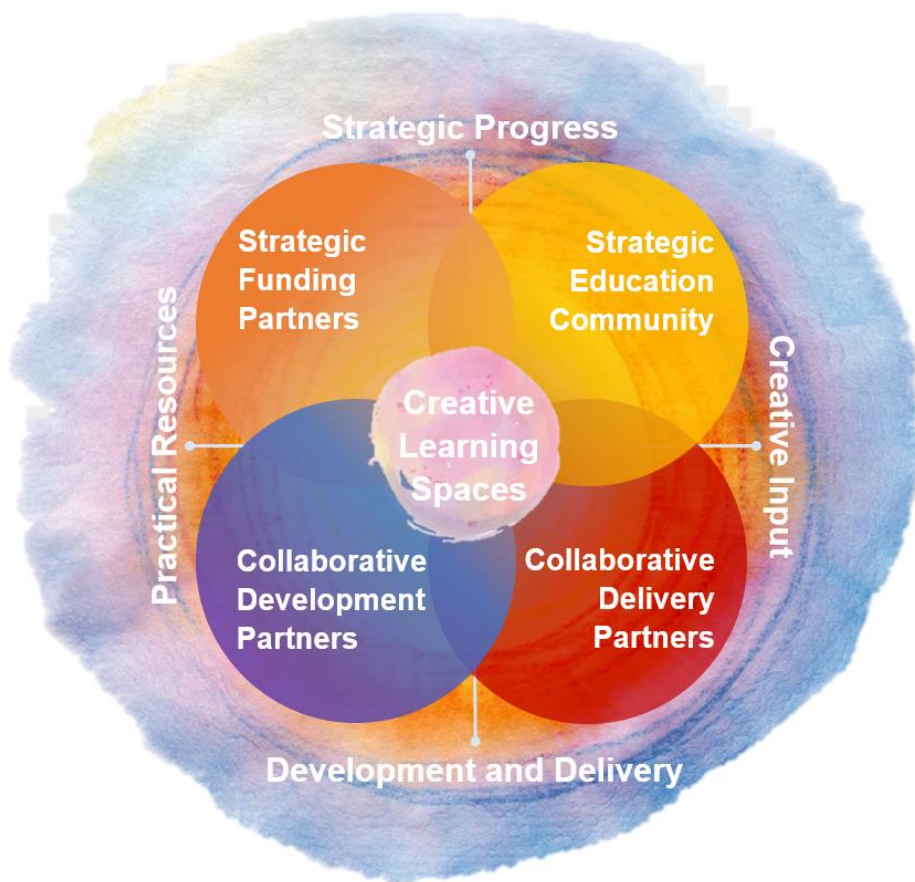
- Support the most vulnerable children to have access to learning that doesn't just increase their knowledge but feeds their imagination
- Ensure that we have the flexibility and expertise to work with the people and communities where the need is greatest
- Ensure that the most vulnerable children understand their rights and we help to amplify their voice
- Collaborate with the best local partners where problem solving for a better world is a shared responsibility
- Promote the core principle that residential support for vulnerable young people is a 'last resort' and that we strive to ensure vulnerable children are brought up in loving families and caring communities.

These represent the core values and principles of our work with children, where their welfare is fundamental to our work. Given these core values and principles we are committed to the following child protection and safeguarding statements that lie at the heart of our safeguarding policy:

- Understand and respect children within the local context in which they live.
- All types of child abuse or exploitation are unacceptable.
- All children regardless of gender, disability, ethnicity, social background, religious belief, or political view are equal.
- For a child to be creative it is imperative that they feel safe and secure. This is why we help to shape safe, creative spaces that enable children to **speak up and speak out**. We enable children to know and exercises their rights.
- All Paper Boat representatives will support an environment of respect and trust with children recognising them as individuals in their own right.
- All concerns and allegations of child abuse will be taken seriously by all Paper Boat Representatives and responded to appropriately.

- All relevant concerns expressed by children will be taken seriously by Paper Boat representatives.
- Paper Boat will work in partnership with parents / caregivers, other organisations and professionals to ensure the safety of children.

This policy is applicable to all employees engaged by the Paper Boat network, including volunteers and partner supported organisations, visitors and consultants. Paper Boat has developed its own operational model as below:



The policy and procedures will, where necessary, be adapted to ensure they meet the legal requirements of the country of operation and to ensure its validity in the context of local practices and circumstances. It will be made available to all Paper Boat Representatives, donors and beneficiaries.

Paper Boat Collaborative Delivery Partners (e.g. local NGOs) must also comply fully with the minimum standards as set out in this policy. This policy will be placed on all Paper Boat network websites, applicable recruitment materials and other appropriate media.

Paper Boat **Safeguarding Statement**

Paper Boat is fully committed to safeguarding and protecting the welfare of all children and young people by taking all reasonable steps to protect them from threats risks and vulnerabilities. All Paper Boat staff will at all times show respect and understanding for the rights, safety and welfare of all children, young people at risk with whom the organisation comes into contact, and conduct themselves in a way that reflects our principles.

Paper Boat seeks to inspire and enable children to change their world, and has historically supported children who are growing up in poverty in South India and Thailand. At the core of how we work are child-centred creative learning spaces (called Children's Hubs) that equip young people with the skills, experience and personal qualities needed for creative problem solving and leading change in their communities. We operate as a Donor Charity within the UK supporting charities in overseas location.

All involved with Paper Boat programmes have a duty to safeguard and promote the welfare of children and young people at risk. This also applies to our Donor supported organisations who we work closely with. All of these groups should be familiar with our policies and procedures, are expected to comply with them and have a duty to report any child safeguarding, child protection concerns or welfare concerns to the Designated Safeguarding Lead.

In line with our values we will treat children at risk with respect and celebrate their achievements.

These directions are designed to ensure the foundation, vision and ethos determined by Paper Boat become a daily reality and that a positive culture of safeguarding is engendered across each location and throughout the Paper Boat Community.

In order to safeguard and promote the welfare of children this procedural manual has been developed in accordance with the following legislation and guidance:

- UN Convention on the Rights of the Child
- The Children Act 1989
- The Children Act 2004
- Charities Commission Safeguarding Duties
- Safeguarding Vulnerable Groups Act (2006)
- Serious Crime Act 2015 Counter Terrorism and Security Act (2015)
- General Data Protection Regulations (2018)
- Data Protection Act (2018)
- Country specific Child Safeguarding Legislation & Procedure

(Each Paper Boat Partner will adopt the safeguarding framework of the document but ensure there is appropriate attention and local cognizance of local and international legislation.)

This manual is constantly evolving to reflect emergent best practices as our programmes develop.

PAPER BOAT GOVERNANCE & ACCOUNTABILITY

Paper Boat has a clearly aligned safeguarding structure of leadership governance and accountability.

Paper Boat **Safeguarding Lead**- Arun Chinnaraj overarching safeguarding responsibility for Paper Boat.

Board of Trustees - discharges the safeguarding responsibilities of Paper Boat and ensures each supported overseas charity delivers safeguarding effectively.

Trustee Safeguarding Responsibilities- Guidance to Trustees

Your safeguarding duties;

You must take reasonable steps to protect those connected with your charity from harm. This includes:

- people who benefit from your charity's work
- staff
- volunteers
- other people connected to its activities

This should be a key governance priority for all charities, regardless of size, type or income. This does not just apply to those working with children or people who are traditionally considered to be at risk.

You must make sure that your charity's assets are used only to support or carry out your charity's purposes. You must not expose its assets, beneficiaries or reputation to undue risk.

Safeguarding people who are at risk;

Safeguarding means the range of measures in place to protect people in a charity, or those it comes into contact with, from abuse and maltreatment of any kind.

Managing the risk;

People may use your charity to get to children, vulnerable people, or their records for inappropriate or illegal purposes.

You must be alert to this and actively manage the risk that your charity may be deliberately targeted; that its culture may allow poor behaviour to take place; or that people in a position of trust may abuse this.

Funding other organisations;

You should carry out checks (known as 'due diligence') on any organisation that has contact with children or adults at risk before you give funding. This includes overseas partners.

You should be confident that any partner organisation has:

- the ability to carry out the proposed activity or service

- appropriate controls in place, including adequate safeguarding measures

If you fail in your trustee duties;

You can be held responsible for any consequences or loss that your charity incurs if you don't follow your duties.

When the Charity Commission looks into possible breaches of trust or duty, or other misconduct or mismanagement, we can take into account whether you followed safeguarding practice.

Trustees' reporting responsibilities

Charity Commission guidance helps trustees identify serious incidents and ensure that they are reported to the Charity Commission. It also explains how to report them.

The Commission requires charities to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- loss of your charity's money or assets
- damage to your charity's property
- harm to your charity's work, beneficiaries or reputation

The most common type of incidents are frauds, thefts, significant financial losses, criminal breaches, terrorism or extremism allegations, and safeguarding issues.

If a serious incident takes place, you need to report what happened and explain how you are dealing with it, even if you have reported it to the police, donors or another regulator.

Who should report?

The responsibility for reporting serious incidents rests with the charity's trustees. In practice, this may be delegated to someone else within the charity, such as an employee or the charity's professional advisers.

However, all trustees hold ultimate responsibility for ensuring their charity makes a report, and does so in a timely manner.

Overseas Country Office

The Paper Boat Charity currently works with project partners in India and Thailand. In India we have appointed our partner of more than 20 years CEDAR (Centre for Education Development Action and Research) to act as our nodal agency – enabling us to manage, monitor and support programmes and partnerships in India at arms-length. In Thailand we work directly with our local partner Khon Kaen Boys Town.

CEDAR, as our nodal agency in India, have a safeguarding function and specific roles and responsibilities – as both a frontline service provider that works with vulnerable children and responsible for monitoring the safeguarding activities of our other partners in India. These are as follows:

- 1) To ensure that all Paper Boat partners (including the nodal agency) have the necessary child protection and safeguarding policies and procedures in place and that they a) conform with the requirements as set out in Paper Boat's safeguarding policy and procedure and b) any statutory requirements and obligations under local law.

- 2) To ensure that prospective and new partners comply with all requirements on *Paper Boat's Due Diligence Checklist* covering legal registration, compatibility, technical and organisational capacity, risk management, child safeguarding and reputation.
- 3) To appoint a Child Safeguarding Nodal Contacts (currently **Mr Ponkundram**) that will liaise with the Designated Safeguarding Lead in Paper Boat and ensure that staff in the nodal agency and wider partnerships are trained in line with our policy requirements and are fully aware of how to report, record, refer and respond to any child protection and safeguarding concerns that arise.
- 4) Share relevant information (in line with policy guidelines on safer data, confidentiality and information sharing) with the Paper Boat Designated Safeguarding Lead and all relevant statutory authorities in India (such as the Police, District Child Protection Units and the Child Welfare Committee and any relevant multi-agency body) to ensure timely and proportionate reporting of, and action on, any child protection and safeguarding concerns.
- 5) All quarterly reports submitted by CEDAR to Paper Boat will include a safeguarding section that will give an overview of any incidents that occurred during the quarter, reports and referrals made and action taken. Updates on training requirements and outcomes, policy and procedure review and an update from CEDAR's Child Protection Committee so that a single central record can be maintained in the UK.
- 6) Conduct regular internal and external safeguarding audit inspections to ensure that there is appropriate oversight of all partners in India. To ensure on an annual basis that all existing partners remain compliant with the requirements on the *Paper Boat's Due Diligence Checklist* and are supported to strengthen any areas where there is a need for improvement.

Reporting Framework- Timely reports, audits/ inspections and updates to ensure that relevant scrutiny and oversight is achieved across the globe. The actions and issues will be the subject of

continuous review to ensure compliance and delivery. Each location will be audited and inspected annually and the findings and recommendations reported to the Board of Trustees.

PAPER BOAT PROCEDURES

Paper Boat Procedures apply to the Paper Boat Community as defined below:

Any individual affiliated with Paper Boat or Partner Organisations that has governance responsibility and/or may come into contact with vulnerable children.

It is the responsibility of all such individuals to know and understand the Child Protection and Safeguarding Policy and our Paper Boat Safeguarding procedures.

All Paper Boat Community will:

- Receive training in this policy and its procedures, the role of the designated safeguarding lead (DSL) and our code of conduct. This training will be updated at least every year and whenever the Child Protection and Safeguarding policy is reviewed by the Board.
- Receive appropriate formal safeguarding and child protection training which is regularly updated.
- Receive safeguarding and child protection updates (for example, via email, e-bulletins) as required and at least annually, to provide you with the relevant skills and information.
- Be made aware of the signs of abuse and neglect so that you are able to identify cases of children who may be in need of help or protection. Being aware of the main categories of abuse and knowing what to look for is vital to early identification.
- Be made aware of the causes and indicators of current risks that impact upon the safety of children at risk. If you are unsure, you should always seek advice from the designated safeguarding lead.

All staff, volunteers and supported partners should know what to do if a child tells them that s/he is being abused or neglected. Staff are expected to know how to manage an appropriate level of confidentiality whilst liaising with relevant professionals. If you do not feel confident in your knowledge of how to handle such situations contact the Designated Safeguarding Lead in Paper Boat (in the UK) or Child Safeguarding Nodal Contact (in India).

- € You should never promise an individual that you will not tell anyone about an allegation – this may not be in the best interests of the child or others.
- € If you or any member of staff is concerned about a child/adult s/he must inform either the Designated Safeguarding Lead (UK) or Child Safeguarding Nodal Contact (in India).
- € You **must** record information regarding the concerns on the same day directly onto the safeguarding referral form. The record must be a clear, precise, factual account of the observations.
- € If the allegations raised is against another child/children you should follow the same procedures for referring a concern about a child safety.
- € The Child Safeguarding Nodal Contact will assess the information and consider if a child is in immediate danger or is at risk of harm. If the allegation or concern relates to a member of staff or volunteer from Paper Boat then the Designated Safeguarding Lead (UK) will be immediately informed.
- € If the evidence suggests the threshold of significant harm, or risk of significant harm, has been reached, or if s/he is not clear if the threshold is met, the Child Safeguarding Nodal Contact will escalate concerns to the Child Protection Committee.

- € If, for any reason, it is deemed inappropriate to report to the Child Safeguarding Nodal Contact, any volunteer, child, staff member or other individual may report concerns directly to the Child Protection Committee.
- € If it is decided by the Child Protection Committee to make a referral to the relevant child safeguarding organisation this will be discussed with the parents of a child, unless to do so would place the child at further risk of harm. The Committee has a responsibility to contact the relevant child safeguarding organisation.
- € All concerns, discussions and decisions will be recorded.
- € The Child Safeguarding Nodal Contact is responsible for making colleagues aware of trends in behaviour that may affect children at risk.
- € Every member of staff has a duty to refer safeguarding concerns to the Child Safeguarding Nodal Contact.

However, if:

- concerns are not taken seriously by the in country team / Child Safeguarding Nodal Contact/Child Protection Committee; or
- action to safeguard children is not taken; and
- the child is considered to be at continuing risk of harm then staff should speak to the **Paper Boat Safeguarding Lead** or the respective local authorities.

All staff should therefore be aware of their respective process for making child referrals and for statutory assessments.

- It is everyone's responsibility to ensure that concerns are followed up.

- If you have reported a concern, you should expect to be informed about what has happened following the report. If you do not receive this information, you should be proactive in seeking it out.
- If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the authorities immediately.
- Anybody can make a referral. If anyone other than the Child Safeguarding Nodal Contact (CSNC) makes the referral, they should inform the CSNC as soon as possible.
- If the child's situation does not appear to be improving the Paper Boat representative with concerns should press for reconsideration.
- You should all feel able to raise concerns about poor or unsafe practice and potential failures in Paper Boat safeguarding regime.
- If you feel unable to raise an issue with Paper Boat or respective partners or feel that your concerns are not being addressed, whistleblowing channels at the Charities Commission are in place and should be utilised.

SAFER SYSTEMS

Paper Boat representatives: What do you need to do if a child makes a disclosure?

If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:

- **listen to what is being said without displaying shock or disbelief**
- **accept what is being said**
- **allow the child to talk freely – do not put words in the child’s mouth**
- **only ask questions when necessary to clarify**
- **reassure the child, but not make promises which it might not be possible to keep**
- **not promise confidentiality - it might be necessary to refer to children’s social care**
- **emphasise that it was the right thing to tell**
- **reassure her/him that what has happened is not her/his fault**
- **do not criticise the alleged perpetrator**
- **explain what has to be done next and who has to be told**
- **make a written record**

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

Paper Boat Staff & Representatives

All safeguarding concerns must be reported to the Paper Boat office (Safeguarding Designated Officer) within 24-hours of occurrence or upon learning of the incident. For overseas reporting requirements, please refer to section (“Staff Overseas”). All Paper Boat representatives covered by this Policy may report the concern:

The report should include:

- Date, time and location of the incident;
- Nature of what happened;
- Relevant actions taken and proposed to keep the Child(ren) safe; and
- Any immediate help or actions required

Staff Overseas

As a Paper Boat representative, when traveling or working overseas on behalf of Paper Boat or nodal support agencies, where aware of suspected or known allegations of Child Abuse must be reported to the in country nodal office who will notify the Paper Boat Designated Safeguarding Lead.

Secondees and Paper Boat representatives must report all concerns and/or suspected or known Child Safeguarding concerns alleged to have occurred in country within 24 hours of its occurrence or knowledge of the incident.

Responding to Child Safeguarding Incidents

Child Safeguarding Nodal Contacts

Paper Boat shall establish and maintain local Child Safeguarding Nodal Contacts to support direct implementation of in country safeguarding.

Their responsibilities include:

- Be the first point of contact for Child Safeguarding concerns raised by members of staff and other Paper Boat representatives;
- Liaise with the UK team on employee-related Child Safeguarding issues prior to initiation of any action or inquiry into the incident at the local level;
- Support staff during the investigation process;
- Provide basic advice & guidance on Child Safeguarding concerns;
- Conduct and/or facilitate staff training on Child Safeguarding;
- Provide consultation on child welfare issues by helping members of staff to identify issues of abuse and neglect and how to report to the local authorities; and
- Ensure that suspected or known Child Safeguarding concerns are reported to the UK office.

CSNC's are available to receive Child Safeguarding reports and provide overall support to the wider implementation of policies and procedures to safeguard children, namely the Child Safeguarding Policy and other related policies and documents such as the Code of Conduct.

Investigating and Follow-up of Child Safeguarding Allegations

Paper Boat takes every allegation of a breach of our Child Safeguarding Policy seriously. The Designated Safeguarding Lead is responsible to ensure all credible allegations are investigated, logged and tracked.

The CSNC or designee (India) is accountable for coordinating investigations, the interviewing of all involved, consultations with and updates to Paper Boat DSL and/or designee (UK) and making recommendations that will inform future actions. During the investigation process, parents/carers should be kept informed of progress. Representatives covered by this policy must cooperate fully with any investigation or inquiry by Paper Boat and preserve all records relating to any alleged breaches of the safeguarding policy.

It is the responsibility of the nodal office to determine a path for investigation, which may be done in partnership with Paper Boat. In addition, the relevant authorities in that location must be informed so that the appropriate response can be implemented in accordance with local procedures. Irrespective of the local outcome or response, Paper Boat staff must report to the CSNC where they are working.

1. Initial Assessment: Upon receipt of a report, an initial screening will be conducted by the CSNC / DSL. A full account of the matter, any immediate action and all documentation will be recorded.
2. The designated staff member with investigative capacity will develop a Terms of Reference for the internal investigation.

3. Reporting to relevant statutory organisations: In country authorities are to be notified where applicable and relevant thresholds are met.

Handling Allegations Against Staff- Volunteers

Any allegation of abuse against a Paper Boat member of staff must be taken seriously, for the sake of the child at risk involved and the member of staff themselves.

Allegations of abuse by a member of staff include:

- Behaving in a way that has harmed a child, or may have harmed a child/young person
- Committing a criminal offence against or related to a child/young person
- Behaving towards a child/young person in a way that indicates s/he is unsuitable to work with children/young people
- Behaving in a way which contributes to or allows the continuation of abuse of a child or young person.

1. If it is a child at risk making the allegation, the person receiving the allegation should remain calm and inform the child/young person that:

- It is a serious matter and will need to be discussed with the appropriate manager in order to decide how the matter will be investigated
- The child will be kept informed about the progress of the investigation

If the staff member is in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Designated Safeguarding Lead must make a referral to the Disclosure and Barring Service (DBS) or international equivalent where applicable .

SAFER COMMUNICATION

Supporters wishing to contact children

Paper Boat continues to work with a residential care provider DACS – who fulfil the requirements for residential care to be as a 'last resort' only and of the highest standard. Historically individual sponsors were able to write letters and send cards to specific children, and received case files compiled by volunteers and overseas staff containing updates and photographs.

Moving forward, we will not be facilitating direct communication, or giving out information about individual children.

Responsible communication with children: shifting to a safeguarding perspective

Over time, research has shown that letter writing and the personal connection is usually of more benefit to the sponsor than it is to the child, and sometimes problematic for young people who already have complicated identity issues. This can also lead to unrealistic expectations and a sense of betrayal or rejection when these are not met.

There is the potential for exploitation when personal messages and photographs of minors are distributed to supporters and/or sponsors. Paper Boat exists to raise up and empower children to be those who both understand and exercise their rights. Teaching them that strangers are entitled to letters and photographs, because they've paid for it, is simply not the message we should be teaching children today, or ever.

General best wishes and messages of support may be sent to be read out to all of the children provided that:

- There are no references to specific children
- No solicitations for personal information and or photographs are made
- No offers of additional support are attached
- No direct contact details are included
- No inappropriate language or images are included

1. Messages of support or questions (not personal or directed to a specific child) can be sent directly to the Manager of Administration and Partner Relations in India (currently **Mr Rajadurai**) at jhccedarnodal@gmail.com.

2. The Manager of Administration and Partner Relations in India will check for compliance with the above requirements. It is their responsibility to raise any failures in these regards and/or other concerns with the CNSC. The CNSC may consult with Paper Boat staff and the DSL if required, and in such circumstances a message will only be deemed appropriate if all consulted approve.
3. Only messages that are deemed appropriate in both tone and content will be forwarded to the Child Welfare Officer (currently **Mr Thankachan**) at the residential care home.
4. The Child Welfare Officer should conduct their own risk assessments and has the authority and responsibility to not read out any messages that may cause emotional distress or pose any potential risk to the children under their care.
5. The Child Welfare Officer may provide a general update about the children provided that it protects identities, dignity and rights as agents in their own lives as opposed to victimising language. No personal information (even if anonymised) that could embarrass or distress the child, and any direct quotes or stories must be both anonymised and shared with informed consent. Any photographs including in the general update must be in accordance with the guidelines below, and not focused on the child 'sponsored' by the supporter.
6. The Manager of Administration and Partner Relations in India is responsible for checking general updates for compliance with the above requirements (in 5), supporting the Child Welfare Officer to construct safer communications regarding children, and raising any failures in these regards and/or other concerns with the CNSC and DSL (UK) or designee.
7. Updates that meet all requirements for sponisible and safer communications about children will be sent from the Manager of Administration and Partner Relations in India to supporters that sent messages.
8. Where, at any point of the process, a message from a Paper Boat supporter fails to meet the requisite standards, it is the responsibility of Manager of Administration and Partner Relations in India to inform Paper Boat's Programmes and Communications Manager (currently **Joanne Bowen**) of the decision and the rationale and provide a copy of the original message, such that they can inform the supporter. Where the content of the message raises significant cause for concern it is the Programmes and Communications Manager's responsibility to notify the DSL.

Images and Video Footage

Photography and video footage includes the taking of still photographs, filmed and moving images and video recordings by whatever means.

It is important to be aware of safeguarding issues and risks when taking photos of and/or filming Children, for example but not limited to:

- Increased vulnerability to grooming, particularly when shared alongside information that makes an individual identifiable. This includes personal details, a tag with location information, visual details such as a school uniform.
- Being identified and traced by estranged parents, carers or partners, for example, in adoption or domestic violence circumstances.
- Court proceedings and statutory protection measures.
- There may be religious or cultural reasons for choosing not to be photographed.
- Photos and videos, and any comments on them, becoming a part of an individual's public image. This may affect them later in life, for example, it may affect how they see themselves or how they are viewed by others.
- When shared online, images may be copied, downloaded, screenshotted or shared by anyone. These could be adapted for inappropriate use and shared on sites showing abuse images or shared within groups of offenders.
- Breaching of data protection policies and/or legislation.

We will seek to keep children, young people safe by:

- always asking for written consent from a child and their parents or carers before taking and using a child's image
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- never publishing personal information about individual children
- making sure children, their parents and carers understand how images will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
 - only using images of children in appropriate clothing (including safety wear if necessary)
 - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
 - using images that positively reflect young people's involvement in the activity.

Storing images

- We will store photographs and videos of children securely, in accordance with our safeguarding policy and data protection law.
- We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access. Images will be stored for a period of 12 months.

Inter Agency Working

How we all ensure strong relationships with safeguarding partners.

“No single professional can have a full picture of a child/ adult at risk needs and circumstances. If children are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action”.

- DSL/ Child Safeguarding Nodal Contacts will continue to develop and promote effective working relationships with other agencies.
- DSL/ Child Safeguarding Nodal Contacts will ensure that relevant staff members participate where relevant and appropriate in meetings, trainings and safeguarding forums.
- DSL/ Child Safeguarding Nodal Contacts will submit reports and information and keep a record of discussions and agreements.

SAFER WORKFORCE

Paper Boat Code of Conduct

The Code of Conduct has been created to help you understand our core values and the behaviours expected; to support all. It provides guidance and support for the Paper Boat community, with high standards of ethical behaviour and compliance with local laws and regulations being essential to protecting the reputation and long term success of Paper Boat.

SAFER DATA

Record Keeping

Where to record information following a disclosure of concern.

When a child/ adult at risk has made a disclosure, or when an individual has concerns about a child's welfare the member of staff should:

- make brief notes immediately after the conversation;
- make a complete and formal record as soon as possible afterwards.
- not destroy the original notes in case they are needed by a court .
- record the dates and times of your observations;
- record the date, time, place and any noticeable non-verbal behaviour and the actual words used by the child or any discussions you were involved in;
- record explanations given by the child;
- draw a diagram to indicate the position of any injuries;
- record statements and observations rather than interpretations or assumptions;
- sign and date the record.

Report and submit records; they need to be directed to the appropriate contact DSL/CSNS immediately.

The DSL/CSNS or designated staff member or Trustee will maintain the case file for all matters where there are concerns, with an overview chronology and a record of all communications and actions.

Confidentiality, consent and information sharing.

What and how to share sensitive information.

All staff must have due regard to the relevant data protection principles which allow you to share personal information, The GDPR and Data Protection Act 2018 place greater significance on Paper Boat being transparent and accountable in relation to our use of data.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children, young people at risk safe.

7 Golden Rules!

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are **not barriers to justified information sharing**, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, **unless it is unsafe or inappropriate to do so.**
3. **Seek advice** from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. **Where possible, share information with consent**, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect

information to be shared.

5. Consider safety and well-being: **base your information sharing decisions on considerations of the safety and well-being of the individual and others** who may be affected by their actions.
6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure:** ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Paper Boat recognises that all matters relating to child protection are confidential. We also recognise the importance of information sharing between professionals and local agencies.

SAFER RECRUITMENT- TRAINING

Paper Boat recognise the importance of remaining vigilant and maintaining a culture of safe recruitment. The following is the pathway to safe recruitment;

Following receipt of an application staff, Trustees and volunteers within Paper Boat the following steps must be followed:

1. DSL/ Child Safeguarding Nodal Contacts review applications to determine suitability.
2. Secure references.
3. Interview panel to seek confirmation of the applicant's suitability and capacity through interview.
4. Ensure at least one member of every shortlisting and interview panel will have completed safer recruitment training.
5. DSL/ Child Safeguarding Nodal Contacts to ensure individuals who have lived or worked outside the UK undergo the same checks as all other staff.
6. Making further checks considered appropriate, so that any relevant checks that occurred outside the UK can be considered.
7. Ensure Candidates provide to Paper Boat:
 - identity documents, like birth certificate or passport
 - two written references
 - details of any criminal convictions
 - satisfactory DBS check/ relevant background check
8. Following background checks and satisfactory submission and validation of all documentation the applicant will be notified.
9. DSL/ Child Safeguarding Nodal Contacts to ensure all staff have a period of induction upon appointment (see Induction)
10. DSL/ Child Safeguarding Nodal Contacts to create an entry in the Single Central Record when new staff join Paper Boat

Single Central Record (SCR)

The SCR is centrally coordinated via DSL and all data requests, updates, renewals are managed accordingly.

DSL must:

- maintain a single central record of pre-appointment checks.

The single central record must cover the following people:

- all staff (including staff, volunteers, trustees) who work for and with Paper Boat, this is equally applicable for overseas locations and each partner needs to be able to evidence due diligence for all staff.

The SCR must record the following information for staff detailed above.

The record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- further checks on people who have lived or worked outside the UK.

Staff Training

Paper Boat has recognised the need and importance of safeguarding training;

- Each DSL will undertake training and also undertake DSL 'New to Role' and 'Update' training every two years.
- Board members will undertake a safeguarding induction.
- All Paper Boat staff will receive appropriate safeguarding and child protection training which will enable them to:
 - Recognise potential safeguarding child protection concerns involving children
 - Respond appropriately to safeguarding issues and act in line with this policy
 - Record concerns in line with the Paper Boat policies
 - Refer concerns to the DSL and be able to seek support external to Paper Boat if required.

- Staff will receive appropriate training to ensure they are aware of a range of safeguarding issues.

- Staff training will also include Paper Boat and Nodal responsibilities, Paper Boat and Nodal child protection procedures, online safety, safe working practice and external reporting mechanisms.

- Staff will have safeguarding training updated as appropriate.

- All staff members will receive regular safeguarding and child/ adult protection updates (e.g. staff newsletter, e-Bulletins, staff meetings or briefings, other training etc.), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

- **Induction training, must include the Paper Boat Code of Practice policy and the procedures set out in this manual together with the child protection policy.**

APPENDIX 1- ADDITIONAL SAFEGUARDING GUIDANCE & PROCEDURE

The Paper Boat policies and national legislation and guidance are designed to support understanding of specific safeguarding concerns. The below guidance is an outline of safeguarding principles and processes, for reference purposes only.

Indicators of Harm

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Some of the following signs may be indicators of physical abuse. Bruising It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, through a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Linear bruising at any site, particularly on the buttocks, back or face

- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechial hemorrhages (pinpoint blood spots under the skin). Commonly associated with slapping, smothering/suffocation, strangling and squeezing

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

Poisoning

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children. Fabricated or Induced Illness - Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer.

Bite Marks

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded. Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid. Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Scars

A large number of scars and scars of different sizes and ages, or on different parts of the body, or unusually shaped, may suggest abuse.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical or emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Some of the following signs may be indicators of sexual abuse.

Child sexual exploitation

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and

Honour based' violence'

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is also known as female genital cutting and female circumcision, is the ritual removal of some or all of the external female genitalia. All staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. It should be noted that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Preventing radicalisation

Protecting individuals from the risk of radicalisation should be seen as part of our wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings.

Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, and mental or physical ability. Domestic abuse can also involve other types of abuse. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Human Trafficking

Human trafficking involves recruitment, harbouring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.

In other words, trafficking is a process of enslaving people, coercing them into a situation with no way out, and exploiting them.

People can be trafficked for many different forms of exploitation such as forced prostitution, forced labour, forced begging, forced criminality, domestic servitude, forced marriage, and forced organ removal.

Bonded Labour

