

Paper Boat Safeguarding Policy & Procedures

March 2025

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1. Introduction

Paper Boat is fully committed to safeguarding and promoting the welfare of children and adults at risk of harm and abuse. Our beneficiaries are some of the most vulnerable children globally and as such the safeguarding of children is at the very centre of our focus.

As a UK charity working with vulnerable children and communities through funding partners in India, we recognise our responsibility to ensure the safety and protection of all individuals in our programmes and activities.

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.

This policy applies to all Paper Boat employees, volunteers, trustees, associates, consultants, contractors, and partner organisations. It outlines our commitment to safeguarding, the procedures to follow when concerns arise, and the legal framework underpinning our work.

Given the primarily remote nature of our work, with limited direct contact with children and adults at risk of harm and abuse (primarily during annual online events and occasional project visits), this policy focuses on ensuring safe practices, effective partnership working, robust reporting mechanisms, and compliance with both UK and relevant Indian safeguarding legislation.

Paper Boat believes that:

- The welfare of children and adults at risk of harm and abuse is paramount
- All individuals, 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
- Working in partnership is essential to promoting welfare and establishing effective safeguarding practices

2. Legal Framework

Paper Boat's safeguarding policy is informed by the following UK legislation and guidance:

- **Children Act 1989 & 2004:** Establishes the duty to safeguard and promote the welfare of children.
- **Working Together to Safeguard Children (2023):** Provides updated guidance on inter-agency working to protect children.
- **Safeguarding Vulnerable Groups Act 2006:** Outlines requirements for vetting and barring individuals working with children.
- **Care Act 2014:** Establishes a legal framework for protecting adults at risk of harm and abuse.
- **General Data Protection Regulation (GDPR) 2018 & Data Protection Act 2018:** Ensures the safe handling of personal data, including sensitive information about children and vulnerable adults.
- **Serious Crime Act 2015:** Includes provisions on child protection, including female genital mutilation (FGM) and forced marriage.
- **Counter-Terrorism and Security Act 2015:** Requires organisations to prevent radicalisation and protect vulnerable individuals from extremism.

- **Online Safety Act 2023:** Addresses online harms and ensures protection in digital spaces.
- **Charity Commission guidance on safeguarding for trustees and charity staff**

Paper Boat also recognises and respects relevant Indian legislation, including:

- **Juvenile Justice (Care and Protection of Children) Act, 2015**
- **Protection of Children from Sexual Offences Act, 2012 (POCSO)**
- **Right of Children to Free and Compulsory Education Act, 2009**

1.

3. Safeguarding Principles

Paper Boat is committed to the following principles:

- All children and adults at risk of harm and abuse , regardless of gender, ethnicity, disability, or background, have the right to be safe from harm.
- All forms of abuse, neglect, exploitation, and discrimination are unacceptable.
- Concerns about welfare must be reported and acted upon promptly.
- Paper Boat staff, volunteers, and partners must conduct themselves in a manner that reflects our values.
- We will value, listen to, and respect all individuals we work with.
- We will adopt safeguarding best practices throughout our operations.
- We will share information about safeguarding and good practice with partner organisations, staff, volunteers, and trustees.
- We will maintain effective working relationships with relevant statutory and voluntary agencies both in the UK and India.

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4. Roles and Responsibilities

4.1 Governance and Oversight

- **Board of Trustees:** Has ultimate responsibility for safeguarding across the organisation and ensuring that the charity fulfils its legal obligations. The Board reviews serious incidents and approves policy updates.

4.2 Key Safeguarding Roles

- **Designated Safeguarding Lead (DSL):** Oversees safeguarding across Paper Boat, ensures compliance with this policy, maintains relationships with relevant authorities, and acts as the first point of contact for concerns.
- **Trustees:** Ensure safeguarding is a governance priority and that all partners comply with safeguarding standards. **Safeguarding Lead Trustee** advocates for Safeguarding on the Board and is main point of contact with DSL along with the Chair
- **Staff and Volunteers:** Must complete safeguarding training appropriate to their role, report concerns, and adhere to this policy.

4.3 Partner Organisation Safeguarding

- **Designated Child Safeguarding Leads (India):** Designated individuals within partner organisations who coordinate safeguarding matters locally and liaise with Paper Boat's DSL.

4.4 Safeguarding Review Process

- Monthly internal safeguarding reviews
- monthly reports to the Board of Trustees
- Post-incident reviews after any safeguarding concern

5. Categories of Abuse

5.1 Categories of Child Abuse

In accordance with UK legislation and guidance, Paper Boat recognises the following categories of child abuse:

- **Physical abuse:** May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.
- **Emotional abuse:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
- **Sexual abuse:** Involves forcing or enticing a child 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.
- **Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

- **Online abuse:** Including grooming, cyber-bullying, sexual exploitation, and exposure to harmful content.
- **Commercial exploitation:** Including child labour, trafficking, and using children for promotional activities without appropriate protections.

5.2 Categories of Adult Abuse

Paper Boat recognises the following categories of adult abuse, in line with the Care Act 2014:

- **Physical abuse:** Including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.
- **Domestic violence:** Including psychological, physical, sexual, financial, emotional abuse, and 'honour'-based violence.
- **Sexual abuse:** Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography.
- **Psychological abuse:** Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation.
- **Financial or material abuse:** Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements.
- **Modern slavery:** Encompasses slavery, human trafficking, forced labour and domestic servitude.
- **Discriminatory abuse:** Including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion.
- **Organisational abuse:** Including neglect and poor care practice within an institution or specific care setting.
- **Neglect and acts of omission:** Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services.
- **Self-neglect:** Includes a wide range of behaviour neglecting to care for one's personal hygiene, health, or surroundings.

6. Reporting and Responding to Concerns

6.1 Recognising Concerns

All staff, volunteers, and trustees should be alert to signs of abuse and neglect. These can include:

- Changes in behaviour or emotional state
- Physical injuries without reasonable explanation
- Neglected appearance or inappropriate clothing
- Concerning statements made by a child or adult at risk
- Inappropriate relationships
- Concerning online content or communications

6.2 Reporting Process

If a staff member, volunteer, or associate has concerns about the welfare of a child or adult at risk, they must:

1. **Recognise:** Identify the concern, even if you do not have proof of abuse.
2. **Respond:** If receiving a disclosure, remain calm and reassuring. Listen carefully and without judgment. Use open questions if appropriate (Who, What, Where, When). Do not promise confidentiality. Explain that you have a duty to report concerns to keep them safe.
3. **Report:** Immediately inform the Safeguarding Lead. If the concern arises during a visit to India, also inform the local Designated Child Safeguarding Lead
4. **Record:** Document the concern factually using the Paper Boat Safeguarding Concern Form (Appendix A), including dates, times, locations, and observations. Avoid interpretation or opinion. Sign and date the record.
5. **Refer:** The DSL will assess the information and determine whether to refer to external agencies, including local authorities in the UK or relevant authorities in India.
6. **Notify:** Paper Boat; in the event of a serious concern and in turn Paper Boat will review the threshold to refer to the Charity Commission.
7. **Follow up:** Ensure the concern has been actioned appropriately and that you receive feedback on the outcome where appropriate.
8. **Review:** Paper Boat Trustees will review concerns and risk register to ensure appropriate oversight, global risk mitigation and policy amendments

6.3 Responding to Immediate Danger

If a child or adult is in immediate danger or requires medical attention:

1. Contact emergency services (call 999 in the UK or 112 in India)
2. Ensure the immediate safety of the individual
3. Inform the Designated Safeguarding Lead as soon as possible
4. Complete the Safeguarding Concern Form

6.4 Escalation Procedure

If you believe that a safeguarding concern has not been addressed appropriately:

1. Discuss your concerns with the Designated Safeguarding Lead
2. If you remain concerned, contact the Trustee Safeguarding Lead
3. If the issue remains unresolved, contact the Chair of Trustees

7. Safer Recruitment

Paper Boat ensures all staff, volunteers, and trustees are safely recruited through:

7.1 Pre-appointment Checks

- **Application Process:** Comprehensive application forms with declarations regarding previous convictions.
- **Interviews:** Structured interviews including safeguarding questions.
- **References:** At least two written references, including from the most recent employer, with specific questions about suitability to work with vulnerable groups.
- **Identity Checks:** Verification of identity through original documents.
- **Qualification Checks:** Verification of relevant qualifications.
- **Right to Work:** Confirmation of eligibility to work in the UK.
- **DBS Checks:** Enhanced DBS checks with barred list check for all UK-based staff, volunteers, and trustees who may have contact with children or vulnerable adults.
- **Overseas Checks:** Additional checks for those who have lived or worked outside the UK.
- **Exception** At the discretion of the DSL and Trustee Lead for volunteers with no contact with vulnerable adults or children (whether remote or in-person) a basic DBS check, ID check and declaration of any previous convictions may be requested. This is on the understanding that if their role changes at any point then a change in training and background checks may be applicable.

7.2 Induction and Training

- All new staff, volunteers, and trustees receive safeguarding training appropriate to their role during induction.
- The induction process includes familiarisation with this safeguarding policy and related procedures.
- All staff must sign a code of conduct that includes safeguarding expectations.

7.3 Ongoing Support and Supervision

- Regular supervision that includes safeguarding discussions
- Annual appraisals that review safeguarding practice
- Refresher training at least every two years

8. Partner Organisation Requirements

Paper Boat works primarily through partner organisations in India. We require all partners to:

8.1 Policy Requirements

- Have their own safeguarding policy and procedures that meet both local legal requirements and Paper Boat's minimum standards.
- Designate a ~~Child Safeguarding Nodal Contact~~ Designated Safeguarding Lead responsible for safeguarding matters.
- Apply safe recruitment procedures for their staff and volunteers.
- Provide safeguarding training to all staff and volunteers.

8.2 Partnership Agreements

All partnership agreements include:

- Explicit safeguarding requirements and standards
- Reporting obligations for safeguarding concerns
- Consequences of safeguarding breaches
- Requirements for regular safeguarding updates and reports
- Notify Paper Boat of all serious reported safeguarding concerns

8.3 Monitoring and Support

Paper Boat will:

- Assess partner organisations' safeguarding arrangements before funding
- Provide safeguarding capacity building support where needed
- Conduct annual safeguarding reviews with partners
- Require partners to report all safeguarding concerns involving children or adults in Paper Boat-funded projects. Serious concerns should be reported to the DSL and Lead Trustee within 48 hours using the email address XXX@paperboatcharity.org.uk

9. Online and Digital Safeguarding

Given the international nature of Paper Boat's work and the increasing use of digital technologies, specific attention is given to online safeguarding.

9.1 Online Events and Communication

For all online events and communications involving children or adults at risk of harm and abuse :

- At least two Paper Boat representatives must be present
- Parents/guardians must give written consent for children's participation
- No personal contact information should be shared
- All communications must take place on approved platforms
- Recording of sessions requires explicit consent and clear privacy protocols
- Appropriate behaviour expectations must be communicated to all participants

9.2 Digital Safety Guidelines

All staff, volunteers, and trustees must follow these guidelines:

- **Do:**
 - Set privacy settings on social networking sites to ensure appropriate access
 - Ensure all devices are password/PIN protected
 - Consider having separate personal and professional online identities
 - Be mindful about how you present yourself online
 - Be aware of Paper Boat's policy regarding digital equipment use
- **Do Not:**

- Give personal information to children or adults at risk of harm and abuse
- Use personal devices to communicate with beneficiaries
- Use the internet or web-based communication to send personal messages
- Share personal details on social network sites with beneficiaries
- Use personal digital cameras/video for work

9.3 Media and Communications

Guidelines for the use of images and stories:

- Informed consent must be obtained for the use of any images or stories
- No identifying information should be used alongside images of children
- Images must respect dignity and not present individuals as victims
- Alternative methods of illustrating our work should be considered where possible

10. Event and Activity Safeguarding

10.1 Risk Assessment

All events and activities must have a safeguarding risk assessment that considers:

- The nature of the activity and potential risks
- The venue and environment
- Participant profiles and specific vulnerabilities
- Supervision arrangements
- Emergency procedures
- Communication plans
- Photography and filming arrangements

10.2 Project Visits

When Paper Boat staff, trustees, or volunteers visit projects in India:

- All visitors must be briefed on safeguarding protocols before travel
- Visitors must be accompanied by a representative of the partner organisation

- Interactions with children and adults at risk of harm and abuse must be appropriate and supervised
- Any concerns identified during visits must be reported immediately
- A post-visit safeguarding report must be completed

11. Data Protection and Confidentiality

11.1 Information Sharing

Paper Boat complies with GDPR and the Data Protection Act 2018. Information about children and adults at risk of harm and abuse will:

- Be processed fairly, lawfully, and transparently
- Be collected for specified, explicit, and legitimate purposes
- Be adequate, relevant, and limited to what is necessary
- Be accurate and kept up to date
- Be kept for no longer than necessary
- Be handled ensuring appropriate security

11.2 Confidentiality

All staff, volunteers, and trustees must understand that:

- The welfare of the child or adult at risk of harm and abuse is paramount
- Information should be shared on a 'need to know' basis
- They have a professional responsibility to share information with other agencies to safeguard children and adults at risk of harm and abuse
- They should not promise to keep secrets

11.3 Record Keeping

Records relating to safeguarding concerns will:

- Be stored securely with restricted access
- Be retained in line with legal requirements and data protection regulations
- Be factual, accurate, and distinguish between fact, opinion, and hearsay
- Be reviewed regularly to ensure compliance with data protection principles

12. Managing Allegations Against Staff

12.1 Types of Investigation

Where there is a safeguarding complaint against a member of staff, volunteer, trustee, or associate, three types of investigation can be opened:

- A criminal investigation led by the police
- An investigation led by statutory agencies responsible for the protection of children or adults at risk of harm and abuse
- A disciplinary or misconduct investigation led by Paper Boat

12.2 Immediate Actions

When an allegation is made:

1. The allegation must be reported immediately to the Designated Safeguarding Lead (or Chair of Trustees if the allegation involves the DSL)
2. The DSL will consult with statutory authorities as appropriate
3. The individual may be suspended pending investigation, depending on the nature of the allegation
4. Support will be offered to the person subject to the allegation
5. Confidentiality will be maintained during the investigation process

12.3 Decision Making

Following investigation:

- The Chair of Trustees will decide whether disciplinary action is required
- Even where criminal charges are not brought, Paper Boat may still take disciplinary action if, on the balance of probability, the allegation is substantiated
- The welfare of children and adults at risk of harm and abuse will remain paramount throughout the decision-making process
- The Charity Commission will be notified of serious incidents as required

13. Review and Monitoring

13.1 Policy Review

This policy will be reviewed:

- Annually by the Board of Trustees
- Following any significant change in legislation or guidance
- Following any safeguarding incident to incorporate learning

13.2 Training Requirements

- All staff and volunteers must complete basic safeguarding training during induction
- The Designated Safeguarding Lead must complete advanced safeguarding training every two years
- All staff and volunteers must complete refresher training annually
- Trustees must complete 'Safeguarding for Governance' training

13.3 Monitoring Effectiveness

Paper Boat will monitor the effectiveness of this policy through:

- Regular audits of safeguarding procedures
- Feedback from staff, volunteers, partners, and beneficiaries
- Learning from safeguarding incidents and near misses
- Annual safeguarding reports to the Board of Trustees

14. Support Resources

14.1 UK Resources

- **NSPCC Helpline:** 0808 800 5000 or help@nspcc.org.uk
- **Ann Craft Trust** (Safeguarding Adults): 0115 951 5400
- **Police Emergency:** 999
- **Police Non-Emergency:** 101
- **Charity Commission:** www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity
- **NCVO Safeguarding Resources:** www.ncvo.org.uk/safeguarding

14.2 India Resources

- **Childline India:** 1098
- **National Commission for Protection of Child Rights:** www.ncpcr.gov.in
- **National Emergency Number:** 112

14.3 Internal Support

- Designated Safeguarding Lead: [Name, Email, Phone]

- Safeguarding Lead Trustee: [Deborah Wetherall
deborah@paperboatcharity.org.uk 07811 867532, Email, Phone]
- Chair of Trustees: [Bert O'Donoghue bert@paperboatcharity.org.uk 07827 858901]

