

SAFEGUARDING PROCEDURES FOR CHILDREN & YOUNG PEOPLE

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1. Introduction

1.1 Purpose of this procedure

The purpose of this procedure is to provide a framework for all staff and volunteers of The Royal Parks (TRP) when dealing with safeguarding issues. It should be used in conjunction with our Safeguarding Policy for Children and Young People to help prevent and reduce the risk of abuse to all children who visit and engage with The Royal Parks onsite, offsite, online or those who have contact with staff or volunteers.

This procedures document gives clear guidance for individuals and key persons on the steps to take in case of safeguarding concerns, disclosures or reports.

1.2 Areas of responsibility

- Everyone's responsibility: safeguarding and protecting children and young people from abuse and neglect is the responsibility of all Royal Parks staff, including temporary, agency, freelance and contract staff, trustees and volunteers (from now referred to as 'staff'), who work for or represent The Royal Parks. This includes a responsibility to ensure they are informed and trained to an appropriate level;
- Reporting: All staff are expected to report and discuss their safeguarding concerns without delay (and within two hours max.) to the relevant Safeguarding contact (as specified in 2.1, Raising a concern).

The seniority of the DSL and Safeguarding Sponsor (SS) should never be a block to anyone raising a concern;

- Whistleblowing: All staff are protected by the Public Interest Disclosure Act 1998, generally referred to as Whistleblowing legislation, if a safeguarding referral or report is made in good faith.

The **Designated Safeguarding Lead** (DSL), **Deputy Safeguarding Lead** (DDSL) and **Assistant Safeguarding Leads** (ASLs) are listed on **Appendix 1**. They form The Royal Parks **Safeguarding Group** together with the **Safeguarding Sponsor** (SS) and the **Designated Trustee Lead** (DTL).

Chaired by the Safeguarding Sponsor, the **Safeguarding Group** has the responsibility to:

- know who the Designated Officer (DO) is for Children's Services local to each Royal Parks site (see list in **Appendix 1**);
- keep updated on national legislation and guidance related to safeguarding;
- ensure these safeguarding policy and procedures are updated every two years and are published on The Royal Parks intranet and its website.

The **DSL** (and Deputy when not available) is responsible for:

- all safeguarding and protection matters at all Royal Parks sites;

- escalating concerns to the SS and DTL if they are of significant risk, complex or challenging (see **Appendix 5**);
- making referrals to external bodies such as local authorities or the police, if these haven't been made by the ASLs or are outside their site, area or function;
- coordinating all needs, training and actions across The Royal Parks, in coordination with HR and relevant colleagues;
- improving systems and practices where needed with the ASLs support and advice;
- updating the SS and DTL on a quarterly basis and providing an annual report for the Board of Trustees.

The **ASLs** are responsible for safeguarding matters in their site, area or function. These include:

- raising awareness of safeguarding with their respective teams;
- ensuring safeguarding policies and procedures are followed, including taking immediate action when required;
- ensuring Safer Recruitment guidelines and practices are followed (including DBS checks at the appropriate level and safeguarding questions at interview for appropriate roles);
- inform the DSL on all safeguarding concerns, disclosures and reports happening on their site, area or function;
- provide recommendations to improve safeguarding policies and procedures.

The **SS** is the Chief Executive and has overall responsibility for safeguarding matters. With the DTL, s/he provides support to the DSL if cases of significant risk are escalated (see **Appendix 5**). They may take HR advice and keep them informed for all safeguarding issues.

The responsibilities of the SS include:

- meeting the DSL twice a year to review activity;
- offering support to the DSL – with the DTL's advice - on any complex or challenging matters;
- briefing the Board of Trustees about serious and significant cases, with DTL's guidance;
- ensuring all relevant actions are taken.

The **DTL** (Designated Trustee Lead) represents the Board of Trustees on safeguarding. Responsibilities include:

- evaluating concerns, recommendations, actions and reports by the DSL;
- providing advice to the Board of Trustees, SS and DSL when required;

- representing The Royal Parks with the Charity Commission, Police and / or other organisations if high risk safeguarding matters occur, when appropriate.

Exceptions: The only time the Designated Safeguarding Lead and the Safeguarding Sponsor should not be informed of a safeguarding concern, disclosure or report is when they are themselves implicated in the safeguarding case. If this happens, staff will need to liaise with the respective line manager and HR.

The following procedures are mandatory and must be followed, including the use of flow charts, reporting forms and other guidelines included in the appendices.

If you have any questions, please contact the Designated Safeguarding Lead.

1.3 Recognition of signs and indicators of abuse

Recognition of the signs and indicators of abuse poses considerable challenges for most professional staff who work with children and do not deal with protection and safeguarding issues on a day to day basis. Identifying abuse of children with disabilities who may also present with a range of challenging behaviours is not straightforward. It is crucial to effective safeguarding that all staff, trustees and volunteers who come into contact with children and young people in the Parks are able to recognise signs and indicators of abuse. This requires recognition that disabled children are more likely to be abused than children without disabilities.

Appendix 3 offers a range of indicators and signs of abuse as well as examining some of the potential blocks to recognition and factors which can inhibit the taking of appropriate steps.

If the member of staff or volunteer believes that a child is at immediate risk of harm or abuse, they should take immediate and reasonable steps to protect the child. However, such situations are very rare, and, in most circumstances, staff should raise a concern following the process below.

Guidance on listening to children who may have raised their concerns with you can be found in **Appendix 4**.

2. Procedures

All staff and volunteers are responsible for raising concerns about inappropriate behaviour, actions or attitude which they observe from a member of the public towards a child in the Parks. If they have sufficient grounds to suspect abuse, they should take action which may include calling the police immediately. Any action taken must be recorded and informed to the relevant ASL or DSL, as required.

If there are safeguarding concerns towards a child or young person when they are participating or benefiting from an activity delivered by The Royal Parks charity, please follow the following procedures below.

See **Reporting a Concern Flow Chart** in **Appendix 6**.

2.1 Raising a concern

Staff should raise a concern by reporting directly and without delay (within two hours max.) to one of the **Assistant Safeguarding Leads** (ASLs) on site. If not available, contact should be made with the **Designated Safeguarding Lead** (DSL) for the organisation. These contacts are listed in Appendix 1. Volunteers need to contact their volunteer coordinator (a member of staff), who will report the concern directly to the ASL on site.

Immediately after raising a concern, staff must make a detailed written account of what they have seen, observed or heard using the **Safeguarding Report Form**. Please see Section 2.2 below and **Appendix 7**.

The member of staff or volunteer who noted and raised the concern is known as the 'alerter'. The Designated Officer from the local authority or Safeguarding Board or the police may wish to speak to the 'alerter' at some point.

Guidance on how to listen to children and young people can be found in **Appendix 4**.

2.2 Recording a concern

The keeping of accurate and prompt recording is fundamental to effective safeguarding and all staff and volunteers have a responsibility to ensure all concerns are recorded appropriately. This requires those who raise concerns to make a written record using the **Safeguarding Report Form (Appendix 7)** within a maximum of 2 hours after raising the concern with the ASL or the DSL. The DSL can provide support in completing the form. If the DSL is not available, another ASL can provide support.

Records should be factual and clear and, where opinion is expressed, it should be recorded as such and distinguished from fact.

When reporting a concern to the local authority, the DSL will inform the local authority that a written record of the concern is available and will email details of the concerns to the local authority as soon as possible.

If at any stage TRP or the local authority decide that no further action is to be taken, then the reason for this and who made the decision will be recorded.

All subsequent actions/ events following the reporting of a concern should be recorded and attached to the original Safeguarding Report Form in chronological order as should any documentation received from the local authority, police or other agencies.

2.3 Confidentiality and storage of safeguarding concerns

The welfare of children and young people override any obligations of confidence we may hold to others. Individual cases will only be shared or discussed on a 'need to know' basis.

Under whistleblowing anyone in The Royal Parks may refer direct to either Children's Social Services or the Police if they are concerned that a child is at risk of harm, following TRP's Safeguarding Procedures and Flow Chart (see **Appendix 6**).

The DSL and ASLs have responsibility to ensure all concerns that happen in their site or area of work are recorded, monitored and secured. Procedures are as follows:

- Electronic records including email will be saved to a secure safeguarding folder located on the S drive. This folder will only be accessible to the Safeguarding Group.
- If there are any hard copy records (e.g. paper forms filled by hand), these will be scanned and kept within this secure folder.
- Access to these records will be strictly limited on a 'need to know basis' and controlled by the ASLs, the DSL and the Safeguarding Sponsor.

2.4 Responding to concerns that a child has been harmed or is at risk of harm by a stranger or member of the public, including abuse and neglect

The procedures for raising a concern, recording, storage and initial fact finding must be followed:

- If the initial fact finding suggests that concerns relate to a member of the public, then the ASLs, the DSL or SS (as appropriate) should report the matter to Children's Services.
- Where it appears that a crime has or may have been committed, the ASLs, the DSL or SS (as appropriate) will need to contact the Police without delay. Some local authorities in London work in a **MASH** (multi agency safeguarding hub, which includes police officers) and they will contact the Police where necessary.
- Where it appears necessary to inform the Police, the ASL, DSL or SS will need to ask if the local authority children's services operate in a MASH. If they do, they will need to clarify if the local authority will make the referral to the police directly, or if the referral needs to be made separately by The Royal

Parks. The agreed actions will need to be recorded in writing and shared between both organisations.

- In some circumstances the Police may decide to lead investigations and may need to interview staff or volunteers as witnesses.

See **Reporting a Concern flow chart in Appendix 6.**

2.5 Responding to concerns that a member of staff or volunteer may have abused a child

Please refer to Reporting a Concern flow chart, Appendix 6.

All staff and volunteers are responsible for raising concerns about colleagues; these concerns could be about:

- their behaviour,
- actions or attitude of a member of staff towards a child,
- inappropriate use of restraint,
- actions or behaviour towards a child if working off site,
- accessing or making use of inappropriate online data including child pornography.

The concern could in fact be any that raise significant questions about their suitability to work with children.

The procedures outlined for raising a concern, recording, storage and initial fact finding should be followed.

2.5.1 Raising a concern

Concerns should be reported without delay (within two hours max.) and always on the same day directly to the ASL or DSL.

There are likely to be tensions and anxieties for any member of staff who notes signs and indicators that suggest a colleague poses a concern. The Royal Parks will support any member of staff or volunteer if they do so appropriately, in good faith and in a timely manner.

If the concerns relate to an ASL, the DSL, or a member of the Executive Committee (except from the Chief Executive or SS), then the Safeguarding Sponsor (SS), the Designated Trustee Lead (DTL) and the Chair of Trustees should be informed. If the concerns are related to the SS (the Safeguarding Sponsor and Chief Executive), then the DTL and the Chair of the Board of Trustees must be informed in these circumstances.

2.5.2 Initial fact finding

Initial fact finding when there are concerns about a member of staff requires a high level of confidentiality. It is still reasonable to check some basic facts prior to alerting other professionals. The DSL or SS will lead on initial fact finding with guidance from HR and, in these circumstances, they will not delegate to other staff. In these

circumstances initial fact finding should involve checking files and recent records and clarifying basic facts with key staff.

Initial fact finding should never involve asking a child to discuss the concerns or repeat a disclosure or allegation that has been made.

Initial fact finding can lead to the DSL or SS deciding that there are no protection concerns which warrant a referral to the Designated Officer (DO). In such circumstances, when no further action is being taken, then the decision needs to be recorded on the Safeguarding Report Form and conveyed to the Safeguarding Sponsor and Chief Executive.

2.5.3 Contacting the Designated Officer (DO) of concerns that a member of staff may have harmed a child or has harmed a child, or has possibly committed an offence against a child

If the concerns/ initial fact finding conclude that a member of staff may have harmed a child or has harmed a child or has possibly committed an offence against or related to a child, the Designated Officer (DO) for the local authority in which the site is located must be informed without delay.

See **Appendix 1** for Contact details of Children's Services, DOs and Police.

The SS (Chief Executive) and DTL (Safeguarding Trustee Lead) must be informed of the referral to the DO; informing them will include agreement on next steps to be taken and how all risks are to be managed according to the circumstances. It is expected that they will be kept updated as the situation develops.

Discussions with the DO should include taking their advice on and ideally reaching agreement on a decision about suspension or not, as well as an agreement about informing parents (if known). It is essential that a shared understanding is established about next steps to be taken.

Following these discussions, it is essential that confirmation is made in writing to the DO detailing the concern and the discussions with the DO. It is also essential that a full record is kept for all stages of the process.

2.5.4 Initiating allegation procedures

The DO will decide whether the incident fits the criteria of an allegation against staff. In other words:

- Did the alleged incident potentially cause harm to the child?
- Does the alleged incident potentially constitute a criminal offence?
- Does the alleged incident suggest that this person is potentially unsuitable to work with children?

National allegations procedures are outlined in *Keeping Children Safe in Education 2016*, and local procedures should be set out by the local safeguarding children board (LSCB) on the relevant local authority website.

As appropriate, the relevant ASL, the DSL, SS or senior member of staff, will need to provide the DO and, if necessary the police, with access to all available evidence and a full written account of the concerns and any responses to those concerns to date.

2.5.5 Workplace arrangements

The Royal Parks will decide whether the member of staff should remain in the workplace or whether they should be suspended until the investigation is resolved, after receiving advice from the DO.

The DSL should be briefed and consulted by the ASL and HR at the earliest opportunity. If the member of staff remains in the workplace, safeguards will be put in place to protect the member of staff and the child/children involved.

The Royal Parks will provide support as appropriate and advise that the member of staff may be accompanied by either a work colleague or a Union representative at an investigatory interview.

The senior member of staff will keep the member of staff up to date with regards to timescales of meetings and the procedures being put in place.

If The Royal Parks decides that suspension is necessary, then this will be done without prejudice. Suspension should be considered without delay if it is indicated that:

- A staff member has behaved in a way that may have or has harmed a child;
- A staff member has possibly committed an offence against or related to a child;
- A staff member has behaved towards a child in a way which indicates she/he is now unsuitable to work with children;
- The Children Services, police or the Designated Officer (DO) is advising suspension;
- It is likely to be impossible to investigate the concern unless the staff member is away from the workplace.

No formal internal inquiry can start until the DO and the police have concluded their processes. Agreement should be obtained in writing from the DO that an internal inquiry can commence.

At each stage the DSLs will need to take HR advice, keep the staff member updated (following agreement with the DO), and keep the family of the child updated (following agreement with the DO).

2.5.6 Strategy meetings

The DO will almost always schedule a strategy meeting with the representative from the organisation and from the Police. A Police check will be conducted prior to the strategy meeting to determine whether any previous incidents involving that member of staff are known. Unless the concerns relate to a senior member of staff,

then senior managers should be invited to attend the strategy meeting. It is essential that reparation for the strategy meeting includes checking the member of staff concerned personnel file; training record; supervision record and last annual appraisal.

2.5.7 Decision and next steps

Professionals at the strategy meeting will decide what next steps to take: these may include criminal proceedings, child protection procedures, disciplinary procedures, training needs, any combination of these measures, or no further action.

'No Further Action' by police and the local authority does not mean there is 'no case to answer' internally and HR advice should be considered.

The decision to take disciplinary procedures lies with TRP and may require an internal inquiry; this can only take place once the Police and DO have concluded their processes. However, the DO may inquire what actions were taken. Once an internal inquiry is complete, then the disciplinary procedures can be invoked. If there is a disciplinary that does not lead to a dismissal, then 'lessons learnt' should be incorporated into safeguarding training.

2.5.8 Notifying the Disclosure & Barring Service and/or professional bodies

If a staff member is dismissed because of abuse concerns, then TRP has a legal duty to formally notify the Disclosure & Barring Service. This also applies if a member of staff resigns as a result of safeguarding concerns being raised. The referral process is fully detailed on the DBS website.

If a staff member is dismissed or resigns because of abuse/ neglect concerns, then TRP has a duty to formally notify relevant professional bodies the member of staff belonged to.

2.6 Training and implementing Safeguarding Policy and Procedures

Accessibility and dissemination:

The DSL will ensure that the staff, volunteers and the public has access to the policy and procedures and an understanding that the charity has a duty to inform Children's Services or the Police if there are concerns about abuse. This will be achieved by publishing the policy and procedures on the intranet and TRP's website.

Training:

TRP will ensure that all staff and volunteers have mandatory to training and/or awareness sessions as appropriate to their role and responsibilities. This will include training on the recognition of abuse and neglect and how to respond to such concerns. Training will be offered at different levels online or face to face, depending on responsibilities of each role.

The ASLs, DSL and SS will need to keep their training up to date with renewals or refreshers every two years as a minimum.

Induction:

Line managers will ensure that all new staff, as part of their induction, will read and agree to follow these policies and procedures, including the explanation of roles and responsibilities of the individual, the DSL and the SS.

2.7 Standards of behaviour for staff and volunteers

The following are expected behaviours of TRP staff, volunteers and trustees:

Do

- ✓ Approach any child or young person who appears to be in distress and ask if you can help;
- ✓ Seek assistance from colleagues where appropriate;
- ✓ Question situations that you find suspicious;
- ✓ Look out for unaccompanied children/young people and follow the Lost / Found Children procedure;
- ✓ Avoid situations where you are likely to be in a one-to-one situation with a child / young person by remaining in a public area;
- ✓ Remember that the primary responsibility for care, safety and welfare rests with the child/young person's supervising adult;
- ✓ Report any allegation (even if it is just a suspicion) of abuse or inappropriate conduct immediately to your line manager or TRP contact, who will then be responsible for implementing TRP's Safeguarding Policy and Procedures for Children and Young People, and reporting the allegation to the appropriate Assistant Safeguarding Lead (ASL) or to the Designated Safeguarding Lead (DSL), as appropriate;
- ✓ If you are unable to report the allegation to your line manager or TRP contact, ASL or DSL, you can go directly to the local authority children's social care department or the police, or call the NSPCC for advice (see **Appendix 1** for relevant contact details);
- ✓ Always act professionally and appropriately and ask yourself: 'How would my behaviour look to anyone else and can I justify my actions?'.

Do not

- ✗ Physically restrain a child or young person except in exceptional circumstances, e.g. to prevent injury, damage to property or to prevent theft. In these circumstances minimum restraint should be used;
- ✗ Commit or attempt to commit any act which may endanger persons or property which breaches any safety rule, organisational policy or legislation;

- ✖ Engage in any form of physical or verbal abuse, threatening behaviour or harassment on the organisation's premises or when working on the organisation's business off site;
- ✖ Provide personal telephone numbers/ social media addresses or other contact details to any child or young person encountered through work;
- ✖ Communicate with any child encountered through work through social networking sites (with the exception of official and approved social network channels, e.g. TRP's Facebook page);
- ✖ Provide lifts in a personal vehicle to children;
- ✖ Put yourself in a position where you take on the role of being the individual with primary responsibility for the care, safety or welfare of a child;
- ✖ Do things of a personal nature for children and young people that they can do for themselves or their supervising adult can do for them (e.g. taking them to the toilet);
- ✖ Allow or engage in inappropriate touching of any kind. The main principles of touch are:
 - The desired touch should always be initiated by the child;
 - Touch should always be appropriate to the age and stage of development of the child.

2.8 Lost/Found children

Any child who is found alone and not accompanied by an adult and / or group, should be treated as a lost/found child.

The procedure for dealing with Lost / Found Children in The Royal Parks is to contact the Police Duty Sergeant immediately. The Police will take over the case and inform and update the relevant staff as required.

In case of major events in The Royal Parks (e.g. Half Marathon, BST Festival, Winter Wonderland, Taste of London), if a child is lost or found, the specific event procedure will be followed. A specific lost / child procedure will also apply in enclosed playgrounds or learning centres managed by The Royal Parks (e.g. Diana Memorial Playground, The LookOut Discovery Centre).

2.9 Photography and film/video

TRP often takes photographs and videos of children and young people who are participating in Royal Parks organised activities for marketing and reporting purposes. Photographs and videos may be shared online via official TRP channels (e.g. TRP's website, TRP's Facebook page).

Permission will be sought from the supervising adult with parental responsibility for the child or young person, who will be asked to sign a marketing release form for photo/filming. In the case of pre-booked groups (e.g. school groups) this will be

done in advance of the visit. Where permission is denied, the child/young person will be given a sticker and will not be photographed or filmed.

Where general photography is being taken – for example crowds gathered at an event signage should be placed alerting the public that photography is taking place. An example of this type of activity is a family day in the park delivered by TRP staff.

Any visitor or member of the public who appears to be taking photographs in suspicious or inappropriate circumstances must be reported to a supervisor or manager immediately. Where appropriate they should then be challenged by the reporting member of staff accompanied with a supervisor/ manager. If it has been found that a visitor/member of public has been behaving in an inappropriate manner around children, the police will be informed immediately, inappropriate behaviour must be challenged when seen and reported to management for support and advice. Additional support from another member of staff may be necessary in some circumstances. Note that volunteers are not expected to challenge a visitor or member of the public but do have a responsibility to report suspicious or inappropriate behaviour to TRP staff.

2.10 Work experience

The Royal Parks currently welcomes students on work experience placements, some of whom are under the age of 18. Enquiries regarding work experience should be referred to the Learning department, where they will follow the corresponding procedures. All work experience placements will need to read the safeguarding policies prior to commencing their experience.

Any concerns relating to the welfare and safety of a child participating in a Royal Parks work experience activity should be referred to the DSL or ASL as applicable.

2.11 Online safety

The Royal Parks is committed to the safety of children and young people engaging in online and digital activities with TRP. Guidance appropriate to the digital activity will be available to children and their parents/carers. TRP will provide the CEOP (Child Exploitation and Online Protection Centre) internet safety link on a relevant webpage to enable members of the public to report concerns directly to them.

All digital and online activity will be developed in accordance with TRP ICT Security Policies & Procedures.