

Child, Young Person & Vulnerable Adult Safeguarding Policy and Procedures

Code of Conduct

Last updated and reviewed at Board Meeting: 1 May 2025

Next review: May 2026

The Telling staff with lead responsibility for safeguarding:

Artistic Director	Clare Norburn	07587 875922 clare@thetelling.co.uk
Board: Trustee with specific oversight of safeguarding	Chloe Lam	chloe.lam@thetelling.co.uk

We also have a safeguarding email address (safeguarding@thetelling.co.uk) that directs to Chloe Lam, the trustee with safeguarding responsibility.

The purpose and scope of this policy

The Telling is committed to safeguarding and promoting the welfare and safety of every person in our community and to all people associated with its programmes, of whatever age. We expect all personnel to share this commitment.

The purpose of this policy statement is to protect all persons who take part in The Telling's activities. We aim to provide a safe and secure environment in which all children, young people and vulnerable adults may flourish and feel comfortable.

This policy applies to anyone working on behalf of The Telling as artists, workshop leaders, animateurs, administrators or interns or in any other capacity which brings them into contact with young people or vulnerable adults. It applies to **anyone making decisions about The Telling's work with young people or vulnerable adults.**

It is the responsibility of each to prevent the physical, sexual, emotional abuse or neglect of every member of our community, and particularly the abuse of those most vulnerable among us, including children, young people and vulnerable adults. The welfare of the child is paramount. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or belief.

All those who work or volunteer with The Telling will be made aware of this policy and of what to do if they have any concerns. There is guidance for those responding to concerns so that they are properly dealt with, including sharing information about concerns with agencies that need to know and involve children, young people and families appropriately.

The Telling believes:

- No one should ever experience abuse of any kind
- The Telling have a responsibility to promote the welfare of all, to keep everyone safe and to practise in a way that protects everyone

The Telling Trustees are committed to practices that protect children from harm. The Board has designated a Trustee (Chloe Lam) to take leadership responsibility for safeguarding arrangements at board level, working with the charity's management team to ensure a clear line of accountability for the policies and procedures it operates to safeguard and promote the welfare of children.

Legal framework for child & vulnerable adult protection

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from nspcc.org.uk/childprotection.

The Telling is **committed to reviewing our policy and good practice annually** and, as necessary following any relevant change of legislation or guidance or any incident that warrants earlier review.

The Telling recognises that:

- employees, contractors and volunteers are in a position of trust over workshop and programme participants
- the welfare of the individual is paramount
- all persons regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- some persons are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- adults may be vulnerable in different ways, and no-one is exempt from the possible risk of safeguarding issues.
- safeguarding disclosures can be made about an incident which has nothing to do with The Telling. Any safeguarding disclosures should be treated with the same level of care.

The Telling seeks to keep everyone safe by:

- valuing, listening to and respecting all
- appointing a nominated safeguarding lead and a lead trustee/board member for safeguarding
- developing child protection and safeguarding policies and procedures which reflect best practice
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- developing and implementing an effective online safety policy and related procedures
- sharing information about child protection and safeguarding best practice with children, their families, staff and volunteers via leaflets, posters, group work and one-to-one discussions
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- implementing a code of conduct for staff and volunteers
- using our procedures to manage any allegations against staff and volunteers appropriately
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people,
- staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- recording and storing information professionally and securely.

Safeguarding principles

The Telling draws on a range of universally recognised initiatives and statements, including:

- NSPCC guidance and DSO training
- The United Nations Convention on the Rights of the Child
- Working Together to safeguard children: A guide to inter-agency working to safeguard & promote the welfare of children (2018)
- HM Government: Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (2017)
- Safeguarding Children - working together under the Children Act 2004 (2007)
- Scottish Government's 'Getting It Right For Every Child'
- National guidance for child protection in Scotland (2014)
- Working together to safeguard children (DFE, 2018)

The Telling remains alert to the UK Government's 'Prevent' guidance for schools on protecting children, young people and vulnerable adults from radicalisation and being drawn into terrorism. However, The Telling's activities are periodic and are scheduled in different areas of the country. This offers practically no opportunity to observe the behaviour of children over a sufficient period of time for the behaviours contained in the guidance to be observed.

The Telling will strive to exemplify these safeguarding principles in all of its sessions and activities:

- the welfare of the child or young person is paramount
- all children, young people and vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- working in partnership with children, their parents, carers and other agencies is essential in
- promoting young people's welfare

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1.0 Definitions

By **'safeguarding and promoting the welfare of children, young people and vulnerable adults'** we mean:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

By **'child or young person'** we mean a person up to the age of 18 years. Where the term 'child' is used in this policy it also includes young people.

By **'child protection'** we mean the part of safeguarding and promoting welfare policy that refers to the activity that is undertaken to protect specific children who are believed to be suffering, or reasonably considered as likely to suffer, significant harm.

By **'abuse' or 'neglect'** we mean forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in family or in an institutional or community setting by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. Males and females can be involved in the abuse of children.

By **'DSO'** we mean Designated Safeguarding Officer. This is the person in our organisation who has responsibility to coordinate the response to safeguarding concerns, and support others in doing so. There are four categories of abuse: physical abuse, neglect, emotional abuse, and sexual abuse. We list detailed examples of abuse in Appendix A, and potential indicators of abuse or neglect in Appendix B.

2.0. Application and responsibilities

The Telling strives to protect the interests and wellbeing of all children and expects all associated with The Telling to share this commitment. This policy applies to all The Telling personnel in any capacity: trustees, employees, musicians, actors, directors, technical team, interns and volunteers.

The Artistic Director, Clare Norburn (clare@thetelling.co.uk) who is also Designated Safeguarding Officer, is responsible for managing and/or having oversight dealing with any concerns about the protection of children. The Artistic Director is appropriately trained and will undertake refresher training every two years. We also have a Board member responsible for oversight of safeguarding, Chloe Lam (chloe.lam@thetelling.co.uk) and a dedicated email address which directs to Chloe, the Trustee responsible for safeguarding: safeguarding@thetelling.co.uk

The Telling personnel will receive training to appropriate levels in order to be able to fulfil their role.

At The Telling, the Artistic Director has responsibility for the protection of children. She is responsible for:

- supporting The Telling personnel after they have shared their concerns about a child
- communicating any changes in policy and procedures
- evaluating the effectiveness of safeguarding within the organisation
- reviewing and updating The Telling's policy and procedures on safeguarding in consultation with the NSPCC and other appropriate organisations
- promoting the importance of safeguarding across the organisation
- managing complaints about poor practice of staff in any capacity
- making decisions about appointing someone who has a criminal record
- ensuring that the organisation meets the requirements of its insurers regarding its safeguarding responsibilities

Third parties (such as photographers, filmers, funders) engaged by The Telling at sessions or events will be appropriately briefed about The Telling's safeguarding requirements and supervised by The Telling personnel at all times.

This policy should be used in conjunction with the Safeguarding and Child Protection Procedures that apply in the venue/school and geographic area in which the particular The Telling session or event is held. The Telling will check the safeguarding policies of all schools before confirming projects with them.

3.0 Aim of this policy and safeguarding procedures

The Telling aims to ensure that all The Telling personnel:

- understand their responsibilities in safeguarding and are supported and/or trained appropriately in fulfilling these responsibilities
- are clear about how to identify and respond to safeguarding concerns about children, especially those that are of a child protection nature
- understand the principles and practice involved in the safeguarding and protection of children
- understand the importance of prevention in responding proactively and efficiently to all concerns
- can communicate the responsibilities of, and approach taken by, The Telling in the protection of children to people participating in The Telling events
- understand and can explain to staff, participating groups and young people that if abuse is disclosed this information cannot remain confidential and that The Telling will report it to the appropriate authority

4.0 Safeguarding practice at The Telling

Where concerns or risks have been identified in relation to a child, we expect all The Telling personnel to:

- take all suspicions and/or allegations of abuse or risk to children seriously and respond swiftly and appropriately through the child protection procedures in this document
- support the timely sharing of information, with relevant authorities, when there are concerns about a child's welfare
- contribute to effective partnership working between all those involved in providing services for children
- recognise the effect and implications of the relevant legislation, which state that the 'welfare of the child is paramount'. This means that considerations of confidentiality, which might apply to other situations, should not be allowed to over-ride the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all concerned when an allegation has been made and is being investigated

Specific practices and requirements:

- parents, carers and children will be made aware of this policy and procedure in pre-event information
- all The Telling personnel (trustees, freelance workshop leaders, animateurs, admin staff, interns and volunteers) will be expected to study this policy and procedure and to confirm in writing that they understand and will adhere to the provisions they contain
- all The Telling personnel will adhere to The Telling's code of conduct in relation to children
- a culture of mutual respect between children and those who represent The Telling in all its activities will be encouraged, with adults modelling good practice in this context
- all staff and The Telling personnel roles will be evaluated as to whether they involve 'regulated activity' or not and applicants vetted appropriately for such roles
- The Telling staff, freelance animateurs and workshop leaders, where the role involves 'regulated activity' will undertake the necessary checks for the country we are delivering work with young people and adhere to the guidance from each devolved government [PVG, DBS or Access NI]
- anybody who encounters child protection concerns in the context of their work on behalf of The Telling will be supported when they report their concerns in good faith

Practical measures to be taken at The Telling sessions and activities:

- this policy, together with referral forms, disclosure forms and other associated information will be

made available through means of a 'grab folder' at every The Telling Session or activity where children are present. One of the DSOs will make clear to all staff and participants the existence of the 'grab folder' and where it will be located throughout the activity

- the latest iteration of this policy will be permanently available at www.thetelling.co.uk/policies
- The Telling will identify at least one (and preferably two as resources permit) Designated Safeguarding Officers (DSOs) with organisation-wide responsibility for safeguarding. Each school/outreach setting will be made aware of the names and contact details of these DSO's. The Telling will aim to maintain clear lines of responsibility in respect of child protection
- Information relating to any allegation or disclosure will be clearly recorded as soon as possible and The Telling practice will include a procedure setting out who should record information and the timescales for passing it on
- The Telling's safeguarding policy and procedures will be integrated into all other appropriate policies and practices, which will be openly and widely available to staff and actively promoted within the organisation.

5.0 Other relevant The Telling policies

Other policies that relate to safeguarding should be read in conjunction with this policy include:

- i. Data Protection Policies and Procedures
- ii. Online Policy [produced in response to Covid-19]
- iii. Recruitment Policy
- iv. Disciplinary & Capability Policy & Procedure
- v. Grievance Policy & Procedure
- vi. Whistleblowing
- vii. Equality and Diversity
- viii. Health and Safety
- ix. Bullying

6.0. Code of conduct for The Telling personnel in relation to safeguarding

The Telling personnel are expected to follow the guidance given below.

Attention is drawn to the position of trust you hold in working with children and the power and influence you hold. The Telling expects this responsibility to be at the forefront of the minds of all personnel to ensure that these positions of trust are never abused.

You should be aware that concerns you have may not always be of the same nature and consequently may not require the same course of action. In practical terms, concerns are likely to arise in a number of ways:

- general well-being concerns: these are concerns that may arise as part of the child's involvement in a session or activity and are not concerns to do with safeguarding or child protection, e.g. homesickness, anxiety about a performance or rehearsal. Overall, these concerns will be dealt with immediately by a member of staff as part of their relationship and engagement with that child
- safeguarding concerns: these concerns will go beyond those that are dealt with as above and will usually arise where a member of The Telling personnel becomes aware of a point of vulnerability in a child's behaviour, and where it is felt that vulnerability needs further assessment and possible action, e.g. a child not eating or being withdrawn
- child protection concerns: these will arise when staff or volunteers are worried or have evidence that a child has been harmed, or appears to be suffering from neglect, or is likely to be harmed or where a child makes a disclosure

All personnel have a responsibility to ensure concerns about children are passed on and assessed. The Telling personnel should not undertake any investigations. The responsibility of The Telling personnel is to be vigilant, recognise, respond, report and record only.

The Telling personnel should:

- value and respect children as individuals
- wherever possible ensure that there is more than one adult present during activities with children, young people and vulnerable adults and avoid spending any time with children when you cannot easily be observed
- invite the young person to bring a friend, move into view of others or leave the door open in situations where it is absolutely necessary to be with a child without another adult present
- watch out for each other - are colleagues being drawn into situations that could be misinterpreted? How colleagues view each other's practice will be how outsiders will view it, including parents
- give guidance and support to less experienced staff
- be aware of any physical contact with a young person. Where necessary, for example when there has been an accident and you are administering first aid, ensure that you are treating the person for the injury only. Do not continue with any additional contact wherever it is unnecessary
- follow the guidelines on the use of touch given below when tutoring a child
- wear identification badges and/or clothing as supplied to you by The Telling at all times
- be aware that sometimes children can behave in an inappropriate way towards an adult, e.g. being overly friendly, challenging or aggressive. If this situation arises staff must be sensitive to, but firm with the child in discouraging any inappropriate behaviour on the part of the child. Any incident of this nature, regardless of how trivial it may appear must be reported to the Designated Safeguarding Officer and a record of it made. The DSO will determine whether the matter needs to be discussed with a parent/guardian and/or brought to the attention of an external agency (the police, child welfare support services etc.)
- inform the DSO immediately if it becomes apparent that a child/member on a course/event is known to you away from the course/event

Staff must not:

- have, or be perceived to have, favourites
- make suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted
- take photographs, video or any image of any child at a The Telling session or activity on their personal phone or device unless expressly authorised in writing and in advance, and aware of the specific circumstances in which this is permitted
- record any personal information (such as address, teacher, phone number) of any child
- take young people to your home or your car, unless written permission has been expressly given by the child's parents/guardians in advance
- use physical punishments or any action that involves locking up or restraining a child
- arrange meetings outside working hours, except in the case of a prior teaching or working relationship
- develop social relationships with young people that participate in The Telling events. If you come into contact with a participant in a social setting, try and move away. If this is not possible, try and maintain a professional distance. Pay attention to your own behaviour in such a setting
- have any contact with children encountered at a The Telling session or activity through email, phone or social media, e.g. Facebook, Instagram, Snapchat, TikTok, Twitter etc., unless in the circumstances of a prior relationship disclosed to The Telling
- accept any money or gifts from The Telling participants. Should anything be offered, you should tell the young person of The Telling's policy and ensure the participant does not feel offended. Report the incident to the DSO as quickly as possible
- give money or gifts to The Telling participants. If in a situation where a participant is stranded with no money to get home, the DSO will discuss the situation with the participant's parents and make a written record of conversations leading to a decision
- borrow money from The Telling participants
- The Telling expects that all staff will be aware of this code of conduct and adhere to its principles of good practice in their approach to all children.

7.0 Use of touch when tutoring a child at a The Telling session or activity

Physical touching of a child by an adult who is not known to the child is generally to be avoided. In some circumstances however, which would include a teaching environment such as that operated at The Telling sessions and activities, touching child appropriately may be permissible. It may also be vital to help correct or develop a child's musical technique, or to avoid the potential for a child to acquire postural habits that might restrict musical development or lead to injury longer term.

The Telling personnel are expected to be considerate, selective, and proportionate in their use of touch in teaching. Guidelines are:

- The Telling personnel may only touch a child in a teaching context
- if in doubt about whether to touch a child in these circumstances, ask a The Telling staff member first
- never touch a child who is anxious or distressed
- only consider touching a child in an environment where other The Telling personnel are present and can act as observers/witnesses
- touch should be for the purposes of correcting technique or posture only – never, for example, hug a child to indicate approval of something learned
- a child should be asked if it is ok to touch, for example, their hand or arm. An explanation of why you wish to touch them should be given first and approval gained
- if a child says no, never touch
- touch must be gentle and for the reason you have explained
- you should tell the child when you have finished

8.0 What to do if you are concerned about a child

There are essentially four key steps to remember, and they are outlined here. They are referred to as the 4 Rs:

1. **Recognising** abuse or neglect
2. **Responding** to the concerns
3. **Referring** concerns on – within The Telling and beyond
4. **Recording** any actions taken and outcomes

To assist staff in their child protection responsibilities The Telling has a DSO at each event with responsibilities across the organisation. This individual will clearly make themselves known to all staff during the Safeguarding briefing at the beginning of each activity and will wear a distinctive red and white lanyard throughout the activity.

8.1 Recognising abuse or neglect

These are some examples of circumstances where concerns about a child may arise:

- You may observe a child who shows signs of neglect (eg is particularly unkempt, dirty, inadequately dressed for the weather or hungry)
- a child may tell you about something that has upset them, or has happened to another child
- someone else might report that a child has told them, or they strongly believe a child has been or is being harmed in some way
- a child may show signs of injury for which there appears to be no satisfactory explanation
- the behaviour or attitude of a member of staff or another adult towards a child worries you or makes you feel uncomfortable in some way
- you witness concerning behaviour between children
- See Appendix B for additional guidance on the potential indicators of abuse.

8.2 Responding to concerns

If a child is telling you about abuse that they have suffered or that another child has suffered abuse, then you should:

- stay calm and listen to what is being said
- find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – but only those who need to know about it. Do not promise to keep secrets or any confidentiality
- allow the child to continue at their own pace
- ask questions for clarification only and avoid asking questions that suggest a particular answer. Do not lead the child, let them tell you
- reassure the child that they have done the right thing in telling you
- tell the child what you will do next and with whom the information will be shared
- record in writing what was said using the child's own words as soon as possible, note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated
- pass your written record to the Designated Safeguarding Officer (DSO) who will identify and take the appropriate action (Eg. they will contact the Head of Safeguarding in the local area, who will in turn contact children's social care)
- keep the discussion confidential, following the procedure for reporting concerns, aside from this do not discuss with others
- record any subsequent events/incidents where you or The Telling are involved affecting the child

Allegations of harm arising from allegations of or reports of underage sexual activity are likely to raise difficult issues and should be handled particularly sensitively. A child under 13 years is not legally capable of consenting to sexual activity. Any concern or allegation about this is very serious and the DSO must be reported on to children's social care in the manner outlined in this procedure.

Sexual activity with a child under 16 years is also an offence. Where it is consensual it may be less serious than if the child were under 13 years but may nevertheless have serious consequences for the welfare of the children involved. Consideration should be given in every case of sexual activity involving a child aged 13 -15 years as to whether there should be a referral to children's social care. Within this age range the younger the child the stronger the presumption must be that sexual activity will be a matter of concern.

The considerations which need to be taken into when determining whether to make a referral to children's social care are outlined in appendix D. The DSO is responsible for determining the action to take.

Any sexual relationship between The Telling staff and a participant is an offence. The Telling staff hold the role of Trusted Person/ Position of Responsibility status preventing relationships between teachers and students.

8.3 Referring concerns on

An outline flowchart of what steps to take should a concern arise is provided in Appendix F.

Action staff must take (immediately, or at least within the same working day) when a concern arises:

- If you work as workshop leader or animateur: report the concern immediately to the Designated Safeguarding Officer (DSO) at the event – contact information of the relevant members of staff are provided to all staff on the front page of workshop schedules
- If you are aware of a concern that is anonymous or that relates to something historical (e.g. relating to previous staff or an incident that happened some time ago) this should not be ignored and must be reported to the DSO at the event, preferably using The Telling reporting form (see appendix E)
- To be as helpful as possible the information should include:
- The nature of the allegation or concern
- A description of any visible bruising or other injuries (location, size, colour or any other significant factor)

- The child's account, if they can give it, of what happened and how any bruising or other injuries occurred
- Any times, dates, or other relevant information
- Whether the parent, carer, child or adult is aware of the concern and a referral having been made
- A clear distinction between what is fact, opinion, or hearsay

Remember – do not delay reporting the matter by trying to obtain more information. Under no circumstances should you physically examine the child where they are alleging injuries. This is a role for medical personnel only.

If for any reason you believe the Designated Safeguarding Officer has not responded appropriately to your concerns, then you must contact The Telling Trustee with responsibility for Safeguarding (see appendix C and front-page contact details).

If you are worried about sharing your concerns about possible abuse within the organisation you should **contact the NSPCC on 0808 800 500** which operates a helpline service.

8.4 Recording and actions taken and outcomes

A form for recording this information is included as Appendix C.

9.0. The role of the Designated Safeguarding Officer

This person is responsible for:

- taking action when a safeguarding incident is identified or reported
- being the first point of contact for staff concerned about the safety and welfare of a child
- providing advice and guidance to staff and parents/carers concerned about a child protection matter
- consulting with other relevant staff at the event in order to determine appropriate action to take at the event
- keeping and making an accurate record of concerns and actions taken
- ensuring appropriate information is available when making a child protection referral and that the referral is made within one working day and confirmed in writing within two working days
- liaising with children's social care and the police, as appropriate
- briefing The Telling Board and keeping relevant senior staff within The Telling informed about any incidents, action taken, and any further action required
- advising the Board on the appropriateness of any Serious Incident Report to the Charity Commission or any other relevant regulatory body and preparing any such report/s
- ensuring that an individual case record is maintained of the concern, action taken, liaison with other agencies and the outcome
- dealing with the repercussions of an incident in the organisation
- collating monitoring data on safeguarding activities
- keeping up to date and briefed about changes to government guidance on safeguarding and child protection and good practice
- providing information and advice on child protection within The Telling
- advising the organisation of child protection training needs
- updating the organisation's policy and procedures on safeguarding

Contact details of key safeguarding personnel in the organisation are given at the beginning of this policy.

10.0 Concerns or allegations made against The Telling personnel

All safeguarding concerns must be passed to the DSO immediately whether the complaint arises during, or after the event.

It is possible that parents or carers may raise concerns about the care or treatment of their child or the behaviour of a staff member during or after a session or activity. However a complaint arises, the DSO must decide how to respond to the complaint and how to address it with the staff member concerned.

The welfare of the child must remain as the central concern. Child abuse can and does occur outside the family setting and may involve anyone who has the opportunity to have contact with children through their work. Evidence indicates that abuse that takes place within an organisation is rarely a one-off event. It is crucial those involved in The Telling are aware of this possibility and that all allegations (current or historical) are taken seriously and appropriate action taken.

The same procedures about managing cases of allegations or concerns about the behaviour of The Telling personnel should be used in respect of all cases in which it is alleged that a staff member has potentially or allegedly:

- behaved in a way that has harmed a child, or may have harmed a child
- committed a criminal offence against or related to a child
- behaved towards a child in a way that indicates s/he may be unsuitable to work with children
- undermined a child's welfare or wellbeing, for example by isolating him/her, poking fun or
- undermining the child in front of others
- acting in breach of the letter of spirit of The Telling's safeguarding policies and procedures – for example by sharing personal phone numbers
- In any such circumstances, personnel are responsible for:
 - sharing their concern with the DSO who will explore the seriousness of the allegation/concern
 - sharing their concern with the nominated The Telling trustee for safeguarding, if the DSO is the subject of the concern
- The DSO or nominated The Telling trustee will be responsible for coordinating the management of the concern, including the decision-making about any immediate protective actions that are warranted, for example:
 - informing and supporting the parents/guardian and child/ren
 - taking appropriate action against the adult in question, such as suspension, confinement, change of duties
 - determining if the police and/or the Local Authority Designated Officer¹ (LADO¹) based in the local authority should be contacted
 - ensuring there is a written, signed and dated account from the member of staff/manager hearing the allegation/concern and a summary of any available additional information including the names and addresses of any potential witnesses
 - ensuring any investigation is speedy, fair and impartial. The member of staff should be informed about the allegation or concern as soon as possible but not before consultation with the Head of Safeguarding and children's social care/police where necessary, in respect of timing and content. The police and children's social care investigation will usually need to take place prior to any disciplinary enquiry and the results may inform the disciplinary enquiry. Any disciplinary enquiry should follow The Telling Capability and Disciplinary Procedure. The outcome of any investigation must be recorded, and a copy kept on the member of staff's personnel file

The fact that a member of The Telling personnel tenders their resignation or ceases to provide their services will not prevent an allegation/concern from being followed up in accordance with these procedures and a conclusion reached. A so called 'compromise agreement' by which an individual agrees to resign, and an employer agrees not to pursue disciplinary action and both agree to a form of words to be used in future references will never be used by The Telling in situations where there are concerns about their behaviour towards children.

If an allegation/concern is substantiated, then the DSO will seek professional advice and then make a

¹ The LADO exists in England only. The equivalent children's social care body should be contacted if the person lives in any other UK country

judgement on whether a referral should be made to the Disclosure and Barring Service, or Disclosure Scotland. If a referral is appropriate the referral should be made within one month. A referral must always be made if The Telling thinks that the individual has harmed a child or poses a risk of harm to children.

There may be circumstances where allegations are about poor practice rather than child abuse. If the investigation shows that the allegation is clearly about poor practice then The Telling will determine how best to remedy this, e.g. as part of its performance management, or disciplinary procedures.

11.0 Support for personnel raising concerns

The Telling operates a Whistleblowing Policy to support and protect personnel who raise concerns. Under no circumstances will retaliation or attempts to orchestrate a reaction to or against any personnel who are involved in a safeguarding concern be tolerated.

If any member of staff does not feel able to share their concern with their supervisor, manager or the DSO then they should speak directly to the Chair of Trustees, Elizabeth Davies: elizabeth.davies@thetelling.co.uk

Personnel involved in any concern are reminded of their duty of confidentiality and may not discuss or disclose any circumstances except as required to investigate the matter.

12.0 Data protection and confidentiality – specific matters relating to safeguarding

Data protection legislation provides for the disclosure of personal information without the consent of the subject in certain conditions, including for the purposes of the prevention and detection of a crime, for example where there is a child protection concern.

Any report/records regarding abuse shall be kept confidential and disclosure should be restricted to only those that have authority for dealing with the incident.

Usual practice is to ask for consent from the child, parent or carer guardian, or member of The Telling personnel concerned before any personal information relating to them is shared with another authority. However, The Telling is not required to ask for consent to share information if it might be unsafe to seek (e.g. seeking consent might increase the risk to the child) or cause an unjustified delay or if it would prejudice the prevention, detection or prosecution of a serious crime.

Further advice will be sought from children's social care or the NSPCC as required.

In situations where a request is made by another organisation for information about an individual, the Foundation Director and Trustee with responsibility for Safeguarding must be informed, and their decision (including the reasoning for this decision) should be recorded and stored securely.

In all cases where information is shared the following information should be recorded:

- Date and time
- Summary of information shared
- Who the information was shared with
- Whether you are sharing with or without consent
- If sharing without consent, whether the child or family were informed
- How the information was shared and any receipt of it having been received.

APPENDIX A

Examples of abuse or neglect

Statutory guidance² offers four defined areas of abuse:

1. **Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. **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.
3. **Sexual abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, 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. Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
4. **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 and emotional harm or danger
 - Ensure adequate supervision (including the use of inadequate caregivers); or
 - Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional need
5. **Bullying:** (in some circumstances bullying can be considered as emotional, physical or sexual abuse) Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and

² England – Working Together to safeguard children: A guide to inter-agency working to safeguard & promote the welfare of children, 2018, HM Government.; Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation, February 2017 Wales – Safeguarding Children - working together under the Children Act 2004 (2007) Scotland – National guidance for child protection in Scotland 2014

emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying (including bullying via the internet) can frequently be underestimated. It can cause considerable distress to children, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).

The NSPCC outlines that:

Peer-on-Peer abuse includes bullying, sexual violence and sexual harassment, physical abuse, sexting and so-called initiation ceremonies.

Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse.

APPENDIX B

Potential Indicators of abuse or neglect

The following signs may be indicators or signs that abuse has taken place although some of these indicators can also be caused by other factors, e.g. a bereavement, family breakdown or illness. It is not the role of The Telling staff to decide if abuse or neglect has taken place rather this is a complex task undertaken by skilled professionals working together across agencies. However, if any of these signs are present then staff should share these concerns as outlined in the procedure. In deciding if something may be a concern it is always helpful to think about the child's age, abilities and stage of development too. It is important to keep in mind that abuse may be committed against children by members of the child's family or party, by other children or by staff.

Physical Abuse

Physical signs of abuse:

- Injuries which occur to the body in places which are not normally exposed to falls or games
- Most children will collect cuts and bruises in their daily life, particularly on bony parts of their body like elbows, knees and shins. You should be more concerned by bruising which can almost only have been caused non-accidentally, is unexplained, or the explanation does not fit the injury, or where treatment isn't being sought. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may be needed
- Patterns of bruising that are suggestive of physical child abuse include:
 - bruising children who are not independently mobile
 - bruising in babies
 - bruises that are seen away from bony prominences
 - bruises to the face, back, stomach, arms, buttocks, ears and hands
 - multiple bruises in clusters or of uniform shape, or carrying the imprint of an implement used, hand marks or fingertips
- Unexplained bruising, marks or injuries on any part of the body
- Cigarette burns, bite marks, broken bones, scalds
- Injuries which have not received medical attention
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which may indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

Emotional Abuse

The physical signs of emotional abuse may include:

- A failure to thrive or grow particularly if a child puts on weight in other circumstances, e.g. in hospital or away from their parents' care
- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour that may indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Obsessions or phobias
- Being unable to play
- Attention-seeking behaviour
- Fear of making mistakes
- Self-harm
- Fear of parent being approached regarding their behaviour

Sexual Abuse

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal area
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour that may indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond his/her age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults

Neglect

The physical signs of neglect may include:

- Constant hunger, or stealing food from other children
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions
- Under nourishment, failure to grow, inadequate care

Changes in behaviour that can also indicate neglect include:

- Complaining of being tired all the time
- Untreated illnesses, not requesting medical assistance and/or failing to attend medical appointments
- Having few friends
- Being left alone, being unsupervised or being supervised by an unsuitable adult or young person

FGM

Physical signs of FGM

A child or woman who has had female genital mutilation (FGM) may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- display unusual behaviour after an absence from school or college
- be particularly reluctant to have routine medical examinations
- ask for help but may not be explicit about the problem due to embarrassment or fear

A child at immediate risk of FGM may ask you directly for help. But even if they don't know what's going to happen, there may be other signs. You may become aware of:

- a relative or 'cutter' visiting from abroad
- a special occasion or ceremony to 'become a woman' or prepare for marriage
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt
- a family arranging a long holiday or visit to family overseas during the summer holidays
- unexpected, repeated or prolonged absence from school
- a girl struggling to keep up in school and the quality of her academic work declining
- a child running away from or planning to leave home

Additional vulnerabilities

It is also important to be mindful that some children are particularly vulnerable to abuse because of their age or their living circumstances or characteristics. Disabled children are a greater risk of abuse than non-disabled children. Children living in homes where there are adverse parental circumstances may also be more at risk, in particular children living in homes where there is domestic violence, substance misuse and/or severe parental mental illness. Children from particularly isolated or new communities may also be at increased risk of abuse as well as those children who show challenging behaviour.

APPENDIX D

Allegations of harm arising from underage sexual activity

Considerations included in the following checklist should be taken into account by the Designated Safeguarding Officer, Designated Safeguarding Lead and/or Trustee with responsibility for safeguarding when determining whether a referral should be made to children's social care about underage sexual activity. The Telling is not responsible for conducting a formal investigation:

- The age of the child
- The level of maturity and understanding of the child
- Age imbalance, in particular where there is a significant age difference
- Overt aggression or power imbalance
- Coercion or bribery
- Behaviour of the child
- The misuse of drink or drugs as a disinhibitor
- Whether the child denies, minimises or accepts concerns
- Whether any attempts to secure secrecy have been made by the sexual partner beyond what would be considered usual in a teenage relationship
- Whether the methods used are consistent with grooming

APPENDIX E

How to report any urgent concerns of a child protection/safeguarding nature:

- Call the police by dialling 999
- Call the NSPCC (Monday – Friday 08:00 – 22:00 or Weekends 09:00 – 18:00) by dialling 0808 800 5000
- Search on the internet for the “MASH team” of the local authority in which the activity is taking place and contact the phone number provided (multi-agency support hub)
- Email help@NSPCC.org.uk

What to do when you have concerns about a child flowchart

