

## Safeguarding and Child Protection Policy

We improve children's literacy by promoting a reading for pleasure culture in primary schools, with a focus on supporting children in the most disadvantaged communities

### Policy overview

#### Introduction

Bookmark is committed to safeguarding and promoting the well-being and welfare of children and young people, and all others who come into contact with the Charity. Bookmark requires all individuals who are involved or associated with the Charity - including trustees, employees, contractors and volunteers - to share this commitment. This is a key governance priority for the trustees of Bookmark.

The safety and welfare of everyone affected by the Charity's activities, especially children and young people, is our highest priority. This policy sets out how the Charity implements safeguarding for children and young people with whom it comes into contact in the course of its work.

This policy must be read in line with Bookmark's other Safeguarding Policies, including the Charity's Safeguarding Statement, Safer Recruitment Policy, and Code of Conduct.

Bookmark is committed to providing children and young people with a safe learning experience, whether conducting face-to-face or online reading programmes. It is important that all Bookmark volunteers, employees, or contractors that interact with children and young people, including online, continue to look out for signs that a child may be at risk.

The Charity is committed to devising and implementing policies so that everyone within the organisation accepts their responsibilities for safeguarding children and young people. This means following procedures to protect children and young people and reporting any concerns about their welfare to the appropriate individuals or authorities.

This policy and associated procedures help us to achieve this in practice by:

- Defining 'child' and 'abuse'
- Ensuring we all work to the same policy and procedures
- Making sure we are accountable for what we do
- Being clear about the roles and responsibilities we all have in safeguarding, and
- Saying what employees and volunteers can expect from the Charity to help them work safely with children and young people.

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### Who is a child or young person?

In England and Wales, a child is defined as anyone who has not yet reached their 18th birthday. Child protection guidance points out that even if a child has reached 16 years of age and is:

- living independently
- in further education
- a member of the armed forces
- in hospital, or
- in custody in the secure estate

they are still legally children and should be given the same protection and entitlements as any other child (Department for Education, 2018).

For Bookmark, this could refer to a child that a volunteer is reading within a school or other setting, such as a library, or any other child, in any setting, an individual may come into contact with while working or volunteering with Bookmark.

This could also refer to any young person taking part as a Reading Mentor Volunteer. In this instance a young person is defined as a person who has attained the age of fourteen and is under the age of eighteen years (Youngs Persons Act 1993).

### Definition of safeguarding

Keeping Children Safe In Education 25 defines safeguarding as –

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, inside or outside the home, including online

### What is abuse?

Abuse is the mistreatment by any other person or persons that violates a person's human and civil rights. Abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering.

### What is child abuse?

According to the NSPCC, "*child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Children who suffer abuse may struggle to find the words to speak out, so it's vital that anyone working with children is vigilant for the signs of abuse*".

Abuse also includes the harm associated with children who witness the ill treatment of others and includes when children see, hear or experience domestic abuse.

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Children and young people may be abused by:

- family members
- friends
- people working or volunteering in organisational or community settings
- people they know
- or, much less commonly, by strangers.

Children and young people suffering abuse often experience more than one type of abuse. The abuse usually happens over a period of time, rather than being a single, isolated incident. Increasingly, abuse can happen online. See NSPCC's '[Definitions and signs of child abuse](#)' factsheet for more information regarding the general signs of abuse and the different types of abuse.

### **Who does this policy apply to?**

This policy applies to trustees, employees, volunteers and others involved or associated with the Charity, all of whom have a duty to safeguard the welfare of all children and young people with whom they come into contact on behalf of the Charity. They must therefore all familiarise themselves and comply at all times with applicable policies plus all statutory guidance on 'Working Together to Safeguard Children'.

This policy will be provided to all trustees, employees and volunteers on induction and will be published on the Charity's website so that it is freely available to others involved or associated with the Charity, including schools, children and young people and their parents/carers (amongst others). Copies are also available on request.

### **Principles of this policy**

No child or young person will be treated less favourably than others in being able to access services of the Charity that meet their particular needs.

Every child and young person, without exception, has the right to protection from abuse regardless of race, colour, nationality, ethnic or national origin, religion or religious belief, gender, sexual orientation, gender reassignment, disability or age.

We will achieve this outcome by having the following in place, as detailed throughout the remainder of this policy:

- Safe organisational ethos
- Safe processes and procedures, and
- Safe recruitment.

It is expected that schools will follow their own safeguarding policies and procedures, as well as the expectations set out in the School Agreement.

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### Safe organisational ethos

#### Position of trust

Adults associated with the Charity who work with children and young people may be in a position of trust. A relationship between a trustee, employee, volunteer or any other individual associated with the Charity and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable individuals; all trustees, employees, volunteers and others involved or associated with the Charity have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

#### Governance

Bookmark holds regular Safeguarding Team meetings to discuss safeguarding issues, such as referrals, new or emerging issues, employee and volunteer training and day-to-day processes in relation to safeguarding. The Trustees also meet quarterly, and safeguarding is a key item of discussion.

Bookmark regularly reviews and benchmarks its Safeguarding and Child Protection Policy and procedures as part of the ongoing risk review and management process. On an annual basis, and as part of the Charity's ongoing child protection work, the Charity will complete the NSPCC safeguarding self-assessment tool (to be used alongside NSPCC's Safeguarding Standards).

### Safe processes and procedures

#### Code of conduct (safeguarding)

The Charity expects all individuals who are involved or associated with the Charity - including trustees, employees and volunteers - to be aware of its Code of Conduct and to adhere to its principles in their approach to all children and young people.

Breach of this Code may lead to disciplinary action (in respect of employees) or measures being taken in accordance with the Charity's Volunteer Problem Solving Policy (in respect of volunteers), and/or removal from the Charity. The Charity may also make a referral to statutory agencies such as the police and/or the local authority children's social care department and/or the Charities Commission.

Members of staff will moderate a number of reading sessions per term to ensure that volunteers are following the principles as laid out in the Code of Conduct.

#### Responsibility for safeguarding and duty to report concerns

The Designated Safeguarding Lead, alongside the rest of the safeguarding team are responsible for ensuring the standards as outlined in this policy are met.

For safeguarding contact details please refer to our website.

If any trustee, employee, volunteer or others involved or associated with the Charity has a concern relating to the safeguarding of children and young people they should raise this with the Designated Safeguarding Lead (or a deputy) as soon as reasonably practicable. If the concerns relate to the Designated Safeguarding

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Lead, they should be raised with Rachel Brodie (who is the trustee with responsibility for safeguarding). Contact details can be found [on our website](#).

In addition to Bookmark's Designated Safeguarding Leads, every school that Bookmark partners with have their own Designated Safeguarding Lead, who is available to discuss any concerns raised. Bookmark's Designated Safeguarding Leads have access to the Designated Safeguarding Lead information for partner schools. The Bookmark Safeguarding Team will advise volunteers based on the concern whether they need to speak directly to the school DSL and provide the contact details.

Trustees, employees, volunteers and others must report concerns immediately to the individual(s) named at Bookmark above and must not investigate concerns themselves. In the instance of volunteering, concerns must also be reported to the school Designated Safeguarding Lead.

The Bookmark Designated Safeguarding Lead (or a deputy) should always be available to discuss safeguarding concerns. If in exceptional circumstances, the Bookmark Designated Safeguarding Lead (or a deputy) is not available, this should not delay appropriate action being taken. Staff (including volunteers) should consider speaking to a member of the Bookmark Senior Leadership Team (in the case of employees; details found within the company Address Book), a Head of Volunteering (in the case of volunteers), and/or take advice from local Children's [Social Care](#). In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or a deputy) as soon as is practically possible.

If a child makes an allegation of abuse or mistreatment by anyone (whether or not the child or young person or individual the allegation is made against is connected with the Charity), the child or young person should be listened to and given reassurance but should not be probed or asked leading questions. Questions should be limited to the minimum necessary for clarification.

No one person can have a full understanding of what is happening in a child or young person's life. Something a child or young person or someone else says (a disclosure) may just not feel quite right to one person, but when reviewed with other concerns, it could be a sign of abuse. This is why both Bookmark and the school (in the instance of volunteering) will each have a single point of contact for any safeguarding concerns – their Designated Safeguarding Lead. Individually, each person's concern may not point to abuse, but collectively they form a picture of what might be happening in a child's life. This is why it is so important that concerns are reported to Designated Safeguarding Leads at the school and at Bookmark.

The content of the discussion should be noted in writing as soon as possible and the report passed on to the Bookmark Designated Safeguarding Lead (or a deputy). No guarantee of confidentiality should be given to the child or young person; instead, he or she should be informed that the matter will be referred in confidence to the appropriate people in positions of responsibility.

However, if a child or young person is in immediate danger or at risk of harm, a referral should be made to Children's [Social Care](#) and/or the police (on 999) immediately. Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead (or a deputy), the Designated Safeguarding Lead (or a deputy) should be informed as soon as possible that a referral has been made. [This link](#) will provide the relevant local Children's Social Care contact number. Serious incidents will also be reported to the Charity Commission.

Safeguarding concerns may arise about a professional working with a child or young person (this includes paid roles as well as those in a voluntary role). The Local Authority Designated Officer (LADO) is an independent person who will coordinate all allegations made against a person who works with children

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and young people. Bookmark will work with the LADO when requested to do so and support their investigation.

Where a trustee, employee or volunteer feels unable to raise an issue with the Charity, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- The [NSPCC whistleblowing helpline](#) is available as an alternative route for those who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. The number to call is 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Trustees, employees, volunteers and others involved or associated with the Charity must share information that might be critical in keeping children and young people safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. If in any doubt about sharing information, employees and volunteers should speak to the Charity's Designated Safeguarding Lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children and young people.

### How safeguarding concerns will be treated

Everyone involved with the Charity has a duty to report concerns regarding safeguarding. Concerns will always be taken seriously, and individuals who raise concerns in good faith will never be subjected to any detriment as a result.

The safeguarding team at Bookmark and its partner schools work together to protect children and young people. Each party agrees that if any child protection or safeguarding concerns are raised, they shall be addressed promptly and in the case of:

- a. a child or young person, the school shall deal with any such concern in accordance with its then current child protection and safeguarding policy; or
- b. Bookmark staff or a volunteer, Bookmark shall deal with any such concern in accordance with its Safeguarding and Child Protection Policy.

Where there is reasonable cause to suspect that a child or young person is suffering, or is likely to suffer, significant harm following concerns reported internally as set out above ('Responsibility for safeguarding and duty to report concerns' section), the Charity will make appropriate referrals to external bodies, such as the Local Authority and/or the Police.

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### Safer recruitment

#### Safeguarding vetting checks

The Charity is committed to safer recruitment, selection and vetting and carries out appropriate checks on all trustees, employees, volunteers and others involved or associated with the Charity who have contact with children and young people including (where applicable) DBS checks, checking references, requiring proof of identity and relevant qualifications. In instances of paid employment interviews will be carried out with two members of the Bookmark team. In instances of volunteers roles, please see our Safer Recruitment Policy for further details.

Under no circumstances will any individual who is considered to pose a risk to children and young people be deployed to support children and young people.

All trustees, employees, volunteers and others involved or associated with the Charity who have contact with children and young people are required to notify the Designated Safeguarding Lead immediately if there are any reasons why they should not be working with children and young people.

It is a criminal offence to knowingly employ an individual barred by the DBS to work in regulated activity with children and young people. For working with children and young people, regulated activity includes unsupervised teaching or supervising, on a frequent (once a week or more often) or intensive (4 or more days in a 30-day period).

The Charity complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. Due to school's safer recruitment requirements, we are unable to work with applicants who have a criminal record.

The Charity encourages all relevant trustees and employees, and all volunteers, to sign up for the DBS Update Service. This enables applicants to keep their DBS certificates up to date and employers / deployers to check a DBS certificate. The Charity completes a status update on enhanced DBS checks every three years. In the instance a trustee or employee (where relevant), or volunteer, has not signed up for the DBS Update Service and three years have passed, they will be required to complete another enhanced DBS check. Any roles that have direct contact with children and young people, including volunteering, will be suspended until the DBS check has been completed.

#### Safeguarding training

All new trustees, employees and programme volunteers will be required to complete mandatory safeguarding induction training, regardless of whether they work directly with children and young people. This will include an introduction to the Charity's Safeguarding and Child Protection Policy and procedures. It will also explain the identity and specific responsibilities of individuals with designated safeguarding responsibilities. Evidence of appropriate safeguarding training is also required for all others involved or associated with the Charity, where they work directly with children and young people.

The induction training will provide trustees, employees and programme volunteers with a full explanation of their roles and responsibilities – and expectations which will govern how they carry them out, and the standard of conduct and behaviour expected from them. Employees will be made aware of the Charity's personnel procedures relating to disciplinary issues (contained in the Employee Handbook), and volunteers will be made aware that any potential breach of Bookmark's Code of Conduct will be dealt with

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in accordance with the [Volunteer Handbook](#). Employees and volunteers will also be made aware of the [Whistleblowing Policy](#) and the [Volunteer Problem-Solving Procedure](#) (in the instance of volunteers).

The induction, and all formal safeguarding training, will also include child protection training, which will be tailored at a level appropriate to the employee's or volunteer's work with children and young people. Where there is regular, direct contact with children and young people, safeguarding training will be mandatory and refreshed every two years for those holding Designated Safeguarding Lead or Deputies roles. All other staff and volunteer roles, where there is regular, direct contact with children and young people, will complete refresher training every three years. This training will include:

- Identifying indicators of the abuse, neglect and exploitation of children and young people;
- How to respond to and report safeguarding concerns or allegations; and
- Appropriate levels of discretion, especially including the duty to never make promises of confidentiality or secrecy in relation to safeguarding concerns.

Training is not limited to formal, face to face events, but can include interactive e-learning, video conferencing (both pre-recorded and live) or a mixture thereof. All training should include clear objectives with the means to monitor the impact and completion of that training. Annual refresher training is also available to all volunteers, staff and trustees.

All employees, volunteers and others involved with the Charity who have contact with children and young people are made aware of and are able to easily access the Code of Conduct to be followed when in contact with children and young people, and information about how to identify, respond to, record and report safeguarding concerns and allegations. All employees, volunteers and others involved with the Charity who have contact with children and young people are required to either read Part 1 or Annex A of the [latest version of Keeping Children safe in Education](#)

All employees, volunteers and others involved with the Charity who have contact with children and young people will receive safeguarding and child protection updates (for example, via email, e-bulletins and meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children and young people effectively.

### Online Reading Programmes: technology and the Online Reading Platform

Bookmark is committed to providing the highest standard of safeguarding and the safety of our users is our paramount concern. The Online Reading Platform used by Bookmark allows children and young people and volunteers to work together in a safe environment. The Charity currently uses Vedamo EAD (company incorporated and existing under the laws of the Republic of Bulgaria, duly registered in the Commercial Register to the Registry Agency, UIC 201907369), as in addition to its simple and accessible design, and smart sharing capabilities, there are the following safeguarding features:

- All Online Reading Sessions will be automatically recorded and stored for up to 12 months from the date of recording, so that they are available and can be viewed by the Charity following the session. Where required for Safeguarding retention processes, some individual recordings may be stored for longer than 12 months. Sessions can be found using a search function which presents keywords, a copy of the notebook and the recording.



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- Volunteers may access recordings of the reading sessions by contacting Bookmark Reading Charity, but are not able to retain access to the recording and are not able to permanently delete whole or part of the recording.
- All Online Reading Sessions can host more than two attendees, enabling a Bookmark and/or school moderator to be 'in the virtual room' with the child and volunteer, should they wish.

Bookmark will ensure that volunteers' personal email addresses will not be shared with the child, so that neither the child nor volunteer can schedule or attempt to schedule a session independently of the school and Charity. All sessions will be scheduled and facilitated by the school and the Charity.

In addition to the safeguarding procedures within Bookmark's Safeguarding Policy suite, the following safeguarding procedures will be adhered to in respect of Online Reading Programmes:

- Once the sessions are recorded, a key word search will be applied to the transcript to flag words identified by the Charity. A member of the Charity's staff will be responsible for the retrospective moderation of a sample of Online Reading Sessions by reviewing the auto-recordings. These sessions will be moderated against a checklist of key criteria that take account of safeguarding and the quality of the Online Reading Sessions. This will enable the Charity to review Online Reading Sessions through a safeguarding lens and also provide feedback to the Volunteer to support their personal development. Volunteers will be made aware that the Charity completes auto-recording and retrospective moderation, to provide a deterrent for unsuitable behaviour and an opportunity to support each Volunteer's personal development. The Charity reserves the right to change its approach to Online Reading Session moderation and shall provide the School and Volunteer with not less than one (1) months written notice of its decision.
- The school will have an adult representative in the physical room with the child throughout every Online Reading Session, so that the child may raise any questions or concerns immediately.
- Bookmark will maintain a digital record of the date, time and attendees of all Online Reading Sessions held.

It is expected that schools will follow their own safeguarding policies and procedures, including those specifically relating to online teaching. It is expected that Schools will inform children and young people of online risks and what to do if they have a concern during their reading session. It is also expected that the school is responsible for the safeguarding, welfare and physical environment of the child during Online Reading Sessions, ensuring it is safe and appropriate.

### Confidential record-keeping

All concerns and any discussions about a child's welfare should be recorded in writing, using the Safeguarding Log (available on request from the Designated Safeguarding Lead or Deputies), whether or not further action is taken. It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome, the reason for this should be clearly recorded.

All data will be processed and retained in accordance with the General Data Protection Regulation (GDPR), and Bookmark's Data Protection policy suite (including the [Data Retention and Destruction policy](#), the [Data Protection policy](#), and the Volunteer Application Form

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The Charity is legally required to undertake pre-appointment checks, and the law and company policy requires us to retain certain information. Where required by law, the length of time for retaining information is often set by the relevant legislation or by considering what is best practice based on what the information is needed for. In relation to information that can identify individuals ('personal data'), the general rule set by the GDPR is that such information should not be kept for longer than necessary for the purposes we use it for.

Our data retention guidelines are articulated in the [Data Retention and Destruction Policy](#), and make reference to data relating to trustees, employees, volunteers, and agency and supply staff.

### Additional information

#### Further guidance

Please refer to the following for further guidance:

- [What to do if you are worried a child is being abused](#) (March 2015)
- [Working together to safeguard children](#) (2023)
- [Disclosure and Barring Service \(DBS\)](#)
- [Charity Commission safeguarding guidance](#)
- [The latest version of Keeping Children Safe in Education](#)

#### Policy review

This policy does not form part of any employee or worker's contract and may be amended at any time.

The policy is reviewed and approved by the Trustees annually or when legislation changes.

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### Contact details

[For safeguarding contact details, please refer to our website](#)

**Police emergency:** 999

**Children's Social Care:** <https://www.gov.uk/report-child-abuse-to-local-council>

**Bookmark Senior Leadership Team (for employees):** details can be found on the Charity Address Book