

Safeguarding Children and Adults at Risk

Bletchley Park Trust

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This policy has been informed by guidance, templates and information provided by the NSPCC 2017 www.nspcc.org.uk

1.0 Introduction

Bletchley Park is a museum and heritage site attracting visitors from across the UK and overseas. Exhibitions, learning and wider public engagement programmes are curated and produced for children, young people, adults, families, schools and communities. Activities extend to outreach in educational establishments, hospitals, care environments, public service, community and, on occasion, home environments (for example for oral history interview projects) within Buckinghamshire and across the UK.

This document applies to **all staff** (anyone working on behalf of and) at Bletchley Park Trust including the board of trustees, senior managers, paid staff, contractors, freelancers, volunteers and sessional staff.

BPT has allocated responsibilities of safeguarding to designated staff across the organisation. The role of the Designated Safeguarding Officer (DSO) is to act as a point of contact for everyone working for BPT and provide support on safeguarding matters. Designated Safeguarding Officers (DSOs) are recruited from Learning, Operations and HR teams. All have undergone specific training to deliver this role.

The policy, procedures and guidance are reviewed annually by the Health Safety and Welfare committee and DSO team. Final policy sign off is made by the Safeguarding Lead and Directorate (on behalf of the Board of Trustees) or sooner if required by changes in legislation or procedure.

1.1 Purpose

'Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.' (NSPCC 2017)

The purpose of this safeguarding policy is:

- To safeguard children, young people and adults at risk who receive Bletchley Park Trust's (BPT's) service, minimising risk of harm and abuse and developing a culture that respects the rights of children and adults at risk (also known as vulnerable adults).
- To provide staff and volunteers with overarching principles and procedures that guide BPT approaches to protecting and safeguarding children and adults at risk.

1.2 Definitions

Child

A **child**, as defined in the Children's Acts 1989 and 2004, is anyone who has not yet reached their 18th birthday.

The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

(Working Together to Safeguard Children 2015)

Adult at Risk

An **adult at risk** who may be vulnerable to abuse or maltreatment is deemed to be someone aged 18 or over, who meets all the following criteria:

1. Has needs for care and support (whether or not the authority is meeting any of those needs);
2. Is experiencing, or is at risk of, abuse or neglect; and
3. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

(Definition of Adult at Risk, Section 42 the Care Act 2014)

The adult may be at risk due to a mental, physical, learning disability, age, illness, frailty. They may be unable to make decisions for themselves or care for themselves or protect against significant harm or exploitation (for definitions of adult and child abuse see [Annex 1](#)). There should be a presumption that adults have a right to make decisions and to be given practicable help to do so. This is just as important in situations where an adult at risk might lack the mental capacity to provide consent.

As a visitor museum and heritage attraction Bletchley Park Trust acknowledges that staff may not have regular contact with adults and children and will not always know if an adult is at risk or the a child is vulnerable. This policy is in place to provide a safe, welcoming environment for all visitors and to set out clear procedures should a disclosure or concern be communicated or observed.

1.3 Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children and adults at risk namely:

The Children Act 1989, United Convention of the Rights of the Child 1991, Data Protection Act 1998, Human Rights Act 1998, Sexual Offences Act 2003, Children Act 2004, Safeguarding Vulnerable Groups Act 2006, Protections and Freedom Act 2012, Children and Families Act 2014, Care Act 2014.

This document must be read alongside BPTs following policies and procedures:

Whistleblowing

Health and safety

Remote and lone working

Harassment

GDPR

E-safety and digital images for young people onsite ([Annex 6](#))

Recruitment and HR safeguarding procedures ([Annex 4](#))

The same principle and procedures apply for an adult at risk (vulnerable adult) as they do for children in this policy.

BPT recognises that:

- The welfare of children and adults at risk is paramount (Children Act, 1989, Safeguarding Vulnerable Groups Act, 2006, Care Act 2014).
- All children and adults regardless of age, gender, racial heritage, sexual orientation or identity, religious belief, have a right to equal protection from all types of harm and abuse.
- Some children are additionally vulnerable because of previous experiences, level of dependency, communication needs and other issues.
- Working in partnership with community services, children, young people, their parents, carers and agencies is essential in promoting welfare.

We seek to keep children and adults safe by:

- Valuing, listening to and respecting children/young people and adults.
- Adhering to safeguarding and child protection practices through procedures and codes of conduct for staff and volunteers.
- Monitoring, implementing and adhering to our policies and procedures.
- Providing effective management and training of staff, including appointing Designated Safeguarding Officers.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing information professionally. Using BPT safeguarding procedures to share information with relevant agencies who need to know.
- Creating and maintaining an anti-bullying environment, ensuring that we have a harassment policy and procedure to help us deal effectively with any bullying issues that arise.
- Ensuring we adhere to health and safety law and regulatory guidance to provide a safe physical environment.

2. Code of Conduct for Working with Children, Young People and Adults

The code of conduct is applicable to Bletchley Park Trust (BPT) paid staff, volunteer staff and external organisations. Everyone working at BPT has a responsibility to ensure that children and vulnerable adults visiting the site and/or participating in BPT programmes and activities are protected from harm and abuse. Staff at Bletchley Park and staff from other organisations who engage with children, young people and adults through Bletchley Park Trust, including students, interns and agency staff may be seen as role models by children, young people and adults at risk and must act in appropriate manner at all times.

When working with children and young people it is important to follow Bletchley Park Trust's code of conduct:

Do:

- Operate within and adhere to Bletchley Park Trust's policies and procedures, established for the safety and security of children and vulnerable adults at all times.
- Recognise that it is each adult's individual responsibility to maintain an awareness of safeguarding procedures.
- Act as a positive role model demonstrating and reinforcing the values laid out in the Code of Behaviour for Children and Young People (see [Annex 5](#)).
- Be respectful towards and listen to children and young people at all times.
- Use appropriate language.
- Treat children, young people and adults at risk fairly and without prejudice or discrimination.
- Make sure that favouritism is avoided.
- Where possible involve children and adults at risk in the planning of programmes and activities; value and listen to their contributions.
- Ensure that wherever possible more than one adult is present during activities with children, young people and adults at risk. If this is not possible, make sure that other adults are within sight or hearing distance, and that they know where you are and what you are doing.
- Monitor use of equipment making sure it is used safely for its intended purpose. Follow the e-safety policy (see [Annex 6](#)).
- Approach a child or vulnerable adult in distress.
- Maintain professional conduct.
- Respect a child's and adult at risk's right to personal privacy.
- Maintain a distance from physical contact and follow safe touch guidance (see [Annex 2](#)).
- Challenge unacceptable behaviour and follow procedures for allegations of abuse, referring concerns immediately and adhering to BPT procedures.
- Proceed with caution when discussing sensitive topics with children and young people.
- If a child or adult at risk asks to speak to you about a private matter inform other adults so that they know where you and the child are located and make sure that the Disclosure Procedure is followed.
- Contact one of the Designated Safeguarding Officers if there are concerns about any aspects of the procedure, process, appropriate checks or the code of conduct.

Do not:

- Patronise, threaten, make sarcastic, derogatory or sexually suggestive comments in the presence of anyone including children, young people and adults at risk.
- Take photos or video recordings of any child or adult at risk without permission of the parent/carer, including in the background of any such media, and in no circumstances for personal use.
- Give children, young people or adults at risk your personal contact or social media details.
- Travel alone in a vehicle with a child, young person or adult at risk unless specifically approved by the parent/carer and Line Manager.
- Rely on your reputation or that of your organisation to protect you.

- Take unnecessary risks when policy and good practice suggest a more prudent approach.
- Develop inappropriate relationships with children or adults at risk including arranging contact outside of work.
- Do things for them that are of a personal nature that they can do themselves or that a parent/carer can do for them. Always defer to the carer/teacher/parent responsible for the individual/group.
- Allow or engage in any inappropriate touching of any kind. The main principles of touch are:
 - desired touch should be initiated by the child
 - touch should be appropriate to the age and stage of development of the child.

Any staff breaching this code of conduct may be subject to Bletchley Park's disciplinary procedures. Any breach involving staff or volunteers from other organisations may result in them being asked to leave the site/activity/project/programme. Serious breach may also result in a referral being made to a statutory agency such as the police and the local authority social services care department.

Code of Conduct for Children and Young People

A code of conduct for children and young people (see [Annex 5](#)) is in place to keep everyone safe and can be referred to during supervised and unsupervised activities (see [Annex 2](#)).

3. Procedures

3.1 Adult to Child Ratios

Bletchley Park's admission terms and conditions state that children under 12 are not to be admitted without an adult. Learning groups are expected to follow recommended ratios of 1:6 for primary age, 1:10 for secondary age students. These ratios meet NSPCC guidelines.

It is important to note that the behaviour of some young people, children and adults at risk may be considered challenging or inappropriate. Approaches to discipline onsite or when carrying out BPT activities should in the first instance be managed by the parent/carer/teacher/group leader. If unsupervised (no parent/carer/group leader/teacher is present) then the matter must be managed by a trained member of staff who will refer to the Code of Conduct for Children and Young People ([Annex 5](#)). Any uncertainties about procedures can be raised with a trained Designated Safeguarding Officer.

Anyone who suspects that a child / adult is at risk of harm or abuse must take responsibility and act swiftly. Delay may put children and adults at further risk of harm. It is not BPT's responsibility to investigate a child or adult safeguarding complaint but to refer concerns onto local authority social care services or the police. The DSO in the Human Resources

department will be responsible for investigating any potential breaches of this policy involving staff, volunteers or contractors.

3.2 When a Child or Adult at Risk is Found

1. If a lost person is found by a member of staff or the public, remain in public spaces, and contact the Duty Manager (DSO) via a steward located at the nearest telephone point (either in the Mansion near the Library, Block B by the lift or Block C at the information desk). If you are on your own make sure you remain in a public space at all times where you can be seen and heard.
2. For security and privacy, information must only be communicated by telephone or face to face.
3. If anyone else is with the child ask them to wait with you until the parent, guardian, carer, teacher, group leader is located. The Duty Manager (DSO) once informed will ask the accompanying adult where the child was found. They will then try and obtain the following information from the lost person:
 - a. Their name, name of school, care group, or organisation they are with.
 - b. Where they were found, where they last saw their parent/guardian/carer.
4. The Duty Manager (DSO) will contact relevant staff (for conducting the search) via telephones located in Block B, Mansion and 2 walkabout mobile stewards/first aiders. Only share information face to face or by telephone.
5. Reassure the child/ adult that you are assisting them. If they need comforting follow the code of conduct. Listen and provide information updates about what you are doing to locate their parent/guardian/carer.
6. Avoid any situations which might appear compromising and be aware that physical contact can be misinterpreted. Touch should only be initiated by the child or vulnerable adult. Touch should always be appropriate to the age and stage of development of the child or vulnerable adult, for example, it would be appropriate to hold the hand of a young child if they offered it to you.
7. If the parent/carer/guardian/group leader claims responsibility verify with the child/adult that they know the carer and they are who they say they are.
8. It is important to remain calm, to reassure the child/adult whilst waiting for the carer/parent/guardian/group leader.
9. The recommended maximum search time for a localised search is 10 minutes before a site wide search is instigated and more staff are needed. The maximum recommended search time for a site wide search is 30 minutes before calling the relevant authority (e.g. the school, the police, Multi Agency Safeguarding Hub). However, the DSO (Duty Manager) will use their best judgement based on the

circumstances and the information provided by the found child/adult at risk as to whether they involve the safeguarding services/police at an earlier or later stage than the recommended timings.

3.3 When a Child or Adult at Risk is Reported Missing

- Contact the Duty Manager (DSO) via a steward located at the nearest telephone point (Mansion, near the library or Block B, by the lift or Block C, at the information desk). Only share information about a missing person via telephone or face to face.
- Try and obtain the following details:
 - A physical description of the child, adult at risk.
 - When and where the person was last seen.
 - Name of child, name of school, day centre, groupStaff must *not* use radios to share this information.
- Reassure the parent/carer/guardian/group leader that you are assisting them and provide them with updates.
- When the missing person has been found, always verify with them that they have been reunited with the parent/carer/guardian/group leader that brought them to the site.
- The recommended maximum search time for a localised search is 10 minutes before a site wide search is instigated and more staff are needed. The maximum recommended search time for a site wide search is 30 minutes before calling the police. However, the Duty Manager should use their best judgement based on the circumstances and the information provided by as to whether they involve the police at an earlier or later stage than the recommended timings.

3.4 Disclosure Procedures

What is a disclosure?

A disclosure is when somebody gives information that they have been or are being harmed.

Anyone who suspects that a child / adult is at risk of harm or abuse must take responsibility and act swiftly. Delay may put children and adults at further risk of harm. It is not BPT's responsibility to investigate a child or adult safeguarding complaint but to refer concerns on to local authority social care services or the police. HR are responsible for investigating any potential breaches of this policy involving staff, volunteers or contractors. See the Action Flow Chart on page 12 and follow the guidance below.

Responding to a Safeguarding Concern

Concerns about adults and children may arise in different situations:

- a. A child, young person or vulnerable adult may disclose something in conversation or ask to speak to you.
- b. You may witness or make an observation of harm or abuse.
- c. Other people may tell you or express a concern.

The following guidance must be followed if you receive a disclosure/allegation of child abuse:

A. Disclosure

- **Listen carefully.** Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause them to 'shut down', retract or stop talking. Give them time to explain.
- **Don't promise to keep a secret.** You cannot keep this a secret, so let them know that you can't. The welfare of the child is paramount and takes precedence over confidentiality. Even if the child stops disclosing to you a disclosure form still needs to be completed to record the incident.
- **Check your understanding** of the situation. Avoid asking questions, only ask questions if you do not understand something that is being said, for example a word they have used.
- **Do not ask leading questions**, for example, if they say they have been hurt follow up with 'Can you describe how that happened?' rather than 'Did someone hurt you?'
- **Tell them it's not their fault.** Abuse is never the child/young person/adult at risk's fault and they need to know this
- **Say you believe them.** A child, young person or adult at risk could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them
- **Do not talk to the alleged abuser.** Confronting the alleged abuser about what you have been told could make the situation a lot worse.
- **Explain** what you'll do next. If age appropriate, explain you have a responsibility to report the abuse to the Designated Safeguarding Officer. Reassure them that they have done the right thing.
- **Inform** the Designated Safeguarding Officer, providing clear and accurate information as soon as possible and within 24 hours. Include to the best of your memory words said by you and the child/adult. Note anything that might be connected e.g. visible injuries (complete Disclose Form)
- **Designated Safeguarding Officer will record all of the details** immediately on the safeguarding reporting form and the actions taken including referral for investigation by the proper authorities if required. The DSO is responsible for decisions about contacting parents, carers or guardians, statutory authorities /police.
- **If you are uncertain** whether what has been disclosed is a safeguarding issue speak to a Designated Safeguarding Officer.
- **Information will be kept confidential**, archived and only shared with relevant authorities as required.

B. Witnessing or making an observation of harm or abuse

- Identify if the child, young person or at risk adult is in imminent danger
- If there is a current risk contact the DSO immediately
- Record all the details immediately afterwards on the safeguarding reporting form including to the best of your memory words said by you and the child/adult (completed disclosure form). Note anything that might be connected e.g. visible injuries
- The Designated Safeguarding Officer will record the concern and the actions taken in referral for investigation by the proper authorities. This information will be kept confidential, archived and only shared with those responsible for following up the case.
- If you are uncertain whether what you have observed is a safeguarding issue, speak to a Designated Safeguarding Officer

C. If other people tell you or express a concern, direct them to:

- Record the details of their concern.
- Contact a Designated Safeguarding Officer.

Confidentiality

“Information sharing is vital to safeguarding and promoting the welfare of children and young people”. When sharing information ensure:

- There is a legitimate purpose for you to share the information.
- It is shared only with those individuals who need to have access.
- It is accurate and up-to-date.
- It is shared in a timely fashion.
- It is shared securely. Radios are not an appropriate method to share information.
- There is a record of who you shared it with.

Once a disclosure has been made or a concern has been raised, it is confidential and should only be discussed with relevant members of staff (DSOs). This is to avoid multiple reports being made and to protect the individuals involved.

Disclosure or Concern Initial Assessment

The Designated Safeguarding Officer should make an initial assessment of the allegation. Where the allegation is considered to be a criminal act or indicates that the child/adult at risk has suffered, is suffering or is likely to suffer significant harm, the matter should be reported directly and immediately to the Thames Valley Police or Milton Keynes Safeguarding Hub.

The assessment is on the basis of need and if further investigation is warranted. Staff should not investigate the allegation.

Allegations Against Staff

Any member of staff reporting an allegation in good faith against a colleague/ volunteer/contractor will not suffer any adverse consequences (see BPT Whistle Blowing Policy & Procedure).

If the concern is about a member of staff the disclosure procedures must be followed. Once an allegation has been made it is confidential and should only not be discussed with relevant members of staff. Consideration will be given to the need to for a police investigation if there is a possible criminal offence. Enquiries and assessment by social care will be made if a child/adult at risk is in need of protection. There will be consideration by the employer of disciplinary action in respect of the individual.

The Local Authority Designated Officer must be contacted within one working day if the alleged person who works with children has:

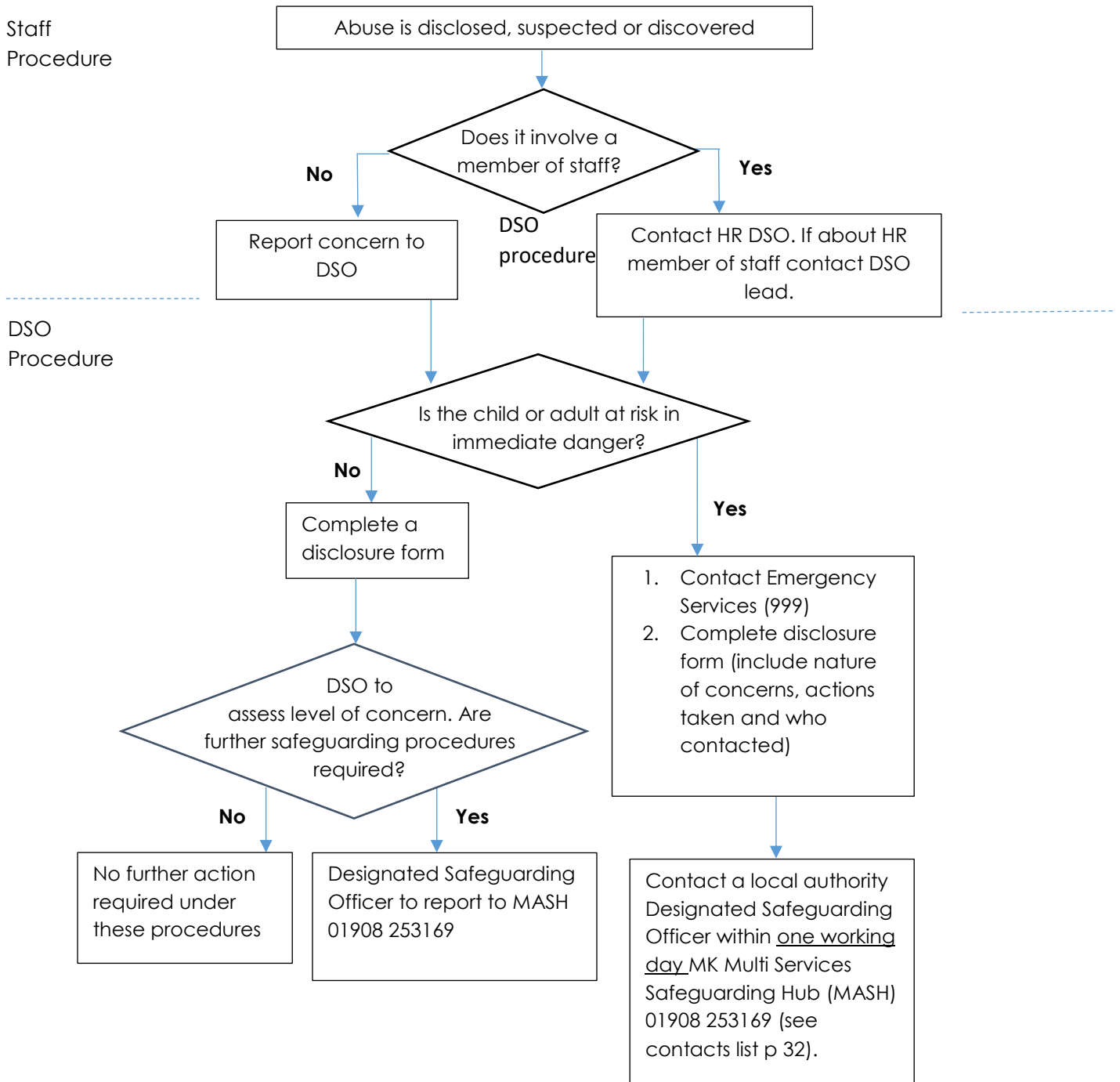
- Behaved in a way that has harmed, or may have harmed a child/adult at risk.
- Possibly committed a criminal offence against or related to a child/adult at risk.
- Behaved towards a child or children in a way that indicated they pose a risk of harm to children/adult at risk.

If a member of staff leaves or is dismissed due to risk/harm to a child/adult at risk they must be reported to the Disclosure and Barring Service by the nominated DSO.

Supporting Employees

All allegations must be dealt with very quickly, fairly and in a consistent way that protects the child/adult at risk and supports the person who is subject to the allegation. Bletchley Park Trust will ensure that an employee facing an allegation is provided with effective support. Suspension will be only be considered after other options have been carefully explored.

Flow Chart for Reporting Concerns



4. Role of the Designated Safeguarding Officer

The role of the Safeguarding Officer is to support training, raise awareness, manage referrals and to be available to staff. DSOs:

- Provide advice and support to staff on issues relating to safeguarding children and adults.
- Encourage a culture amongst all staff of listening to children and adults at risk, taking account of their wishes and feelings.
- Are alert to the specific needs of children in need, those with special educational needs, disabilities and young carers.
- Obtain access to resources and attend any relevant refresher training courses.
- Discuss safeguarding and training needs with Directors and HR to ensure safeguarding procedure training is offered to all staff and volunteers.
- Receive and record information about safeguarding concerns.
- Keep detailed and accurate records of concerns and referrals and ensure records and reports are kept in a safe place.
- Liaise with staff and other DSO staff on matters of safety and safeguarding. Liaise with relevant agencies when deciding to make a referral.
- Refer cases of suspected abuse to the local authority children's and adult's social care services as required, and to the police where a crime has been committed.
- Support staff who make referrals to local authority social care.
- Consult with child and adult protection agencies, such as the local safeguarding children's or adult board, the police, NSPCC as necessary.
- Assess the information, clarify and refer on as appropriate.
- Ensure the child protection policy is publically available and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the BPT in this.
- Maintain links with the local safeguarding board.
- Keep Designated Lead (Head of Learning) informed.
- During service hours a Designated Safeguarding Officer should always be available for staff in the organisation to discuss any safeguarding concerns. Appropriate cover should be provided for out of hours activities.
- Keep up with any safeguarding developments relevant to their role, through DSO meetings, bulletins, reading.
- Monitor the Safeguarding Policy and Procedure, review at a minimum annually.
- Liaise with the Designated Safeguarding Lead about issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

Role of the Designated Safeguarding Lead:

- Lead responsibility for safeguarding and child protection.
- With support from BPT be given time, funding, training, resources to provide advice and support to other staff on welfare and protection matters.
- Ensure safeguarding matters are reported to boards and committees
- Ensure policy and procedure are reviewed annually at a minimum
- Discuss training needs with DSOs
- Ensure safeguarding is on risk register

5. Promoting Safeguarding

Safeguarding is promoted across the organisation at all levels. The policy is disseminated to staff and will form a part of staff and volunteer induction training. Swift action will be taken to safeguard and protect children and vulnerable adults including the recording and reporting of information.

- Safeguarding Policy referred to every six months at Staff and Volunteer Meetings
- Training for staff and volunteer staff on safeguarding during the induction process
- Refresher training as required

6. Recruitment

Safeguarding procedures must be adhered to at all stages of an individual's employment whether paid, contracted or voluntary. Further details can be found in BPT Recruitment Policy and including employing people with a criminal conviction.

Necessary DBS checks will only be carried out for specific identified roles. Enhanced DBS with barred list checks will be made for regulated activity and where activity is unsupervised. Where activity is supervised Enhanced DBS without Barred list may be made if needed. For clarification on checking requirements see <https://www.gov.uk/find-out-dbs-check> and contact HR (see [Annex 4](#)).

7. Photography and E-Safety

BPT will only contract photographers who have DBS checks and will seek permission of the parent/carer/teaching staff. Images will be stored in password protected locations. Staff and freelancers must not use their own personal devices to take photographs (see E Safety and Images Policy, [Annex 6](#), for further details).

When using web connected devices staff will be vigilant in the supervision of children and adults at risk, together with the accompanying and responsible teachers/parents/group leaders, during learning sessions or events. Details of the E-Safety and Digital Images Policy are available in [Annex 6](#).

8. Contacts

See [Annex 8](#) for Designated Safeguarding Officer contact and external professional contact details.

6. Declaration

All employees, contractors and volunteer staff must agree to having read and understood the policy and procedures. Questions about the content of the document or safeguarding procedures should be directed to a Designated Safeguarding Officer.

Annexes

Annex 1

Definitions of Abuse - Children

What is abuse?

'Child abuse is any action by another person - adult or child - that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online. We estimate that over half a million children are abused in the UK each year.'

(NSPCC July 2017 <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>)

Legislative Definitions

'Working to Safeguard Children' HM Government 2015

Abuse and neglect are 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 a 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.

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 include:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they met the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age inappropriate expectations being imposed on children.
- Preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying) causing children frequently to feel frightened, or in danger.
- 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.

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 and clothing, 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 care-takers (e.g. inadequately trained staff), or the failure to ensure access to appropriate medical care or treatment.
- Neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact and non-contact activities, such as involving children in looking at, or in the production of, sexual images, 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.

Other types of abuse include:

Female Genital Mutilation
Bullying and Cyberbullying
Grooming
Honour Based Violence
Forced Marriage

Definitions of Abuse – Adults at Risk

Physical abuse

Assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Domestic violence

Psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Sexual abuse

Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological abuse

Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse

Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern slavery

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse

Forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational abuse

Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission

Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Abuse can occur anywhere at any time and can be carried out by anyone, it can be a single act, repeated acts over a period of time or due to a failure to act (neglect). It can happen to one person, or several people at the same time.

(Care and Support Statutory Guidance 2016, issued under The Care Act 2014)

Other types of abuse include:

Disability and other Hate Crime

Domestic Abuse including Forced Marriage, other 'honour based violence' and controlling or coercive behaviour in an intimate or family relationship.

Human Trafficking

Mate Crime, exploitation of a vulnerable adult by a befriender.

Modern Slavery, slavery, servitude or forced labour

Restraint, unlawful or inappropriate use of restraint or physical interventions

Annex 2

Definitions of Regulated Activity - Children

The following definition has been taken from:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

'The definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

- 1. unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on well-being, or drive a vehicle only for children;*
- 2. work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers.'*

Regulated activity requiring an enhanced DBS check with barred list is determined by the frequency of the activity:

'Care or supervision of children if carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period or overnight.' Is categorised as a regulated activity.

(Regulated activity in relation to children 2014 Gov.UK)

BPT is not classed as a specified place and therefore point 2 does not apply. Examples of activities for point 1 are provided below:

- Point 1.
- a. BPT provides learning activities delivered by Session Leaders and Volunteer Tour Guides - these all take place with a parent, carer or a teacher present, therefore, these sessions are not classed as unsupervised activity.
 - b. If BPT delivers workshops/after school clubs for young people on a regular ongoing basis where parents/teachers/carers with responsibility for these children are not present, the activity is unsupervised. If these activities are delivered once a week or more on an ongoing basis (longer than a few weeks) an "Enhanced with Barred List" DBS checked member of staff would need to be present and safeguarding the welfare of these children.

If a child's attendance is incidental to the activity with adults then it is not considered regulated activity. For example if a child comes to a training event for adults then the trainer would not be engaging in regulated activity.

Definition of Regulated Activity - Adults at Risk

Activities that place a post holder in regulated activity with an adult (a person aged 18 years and over) are:

1. Healthcare for adults provided by, or under the direction or supervision of a regulated health care professional (members of peer support groups and first-aiders are excluded).
2. Personal care for adults involving hand-on physical assistance with washing and dressing, eating, drinking and toileting, oral care or care of the skin, hair or nails (excluding only hair-cutting); prompting and supervising an adult with any of these tasks because of their age, illness or disability; or teaching someone to do one of these tasks.
3. Social work - provision by a social care worker of social work which is required in connection with any health services or social services.
4. Assistance with and managing an adult's cash, paying an adult's bills or shopping because of their age, illness or disability.
5. Assisting in the conduct of an adult's own affairs under a formal appointment.
6. Conveying adults for reasons of age, illness or disability to, from, or between places, where they receive healthcare, personal care or social work.

An adult is considered vulnerable at the point of receiving any of the activities outlined above. The setting in which the activities take place and the characteristics of the adult receiving them are not relevant in deciding whether an adult is vulnerable.

A person whose role involves the day to day management or supervision of any person engaging in regulated activity, should check with HR to assess if their role is classed as a regulated activity.

Safe Touch

A professional distance must be maintained at all times. Safe Touch must be:

Necessary: are you sure that a demonstration or verbal instruction is not adequate

Permitted: permission for contact is sought and given by the child or young person. Ask if you can and accept that permission may be refused.

Clear: the child or young person must be clear about what is being asked.

Contextual: explain why

Always check that your reason for using touch is understood.

Touch must only be used if it is an effective way of learning for the participant.

Annex 3 – Safeguarding Forms

Refer to internal safeguarding policy and procedure document for safeguarding forms.

Annex 4 – HR Safeguarding Procedures

DBS Checking

BPT contracts an external provider to carry out DBS checks. The contracted company will use the online DBS update service wherever possible. If the postholder is eligible for an Enhanced DBS check, they will be asked if they are a member of the update service and in addition asked for their permission to allow BPT and the external provider to check their enhanced DBS certificate. BPT takes the refusal of permission very seriously as this may impact on the ability of the postholder to carry out the role.

Contractors and Freelancers

The need for an enhanced DBS check, or enhanced with barred list check, must be made evident by the member of staff contracting services from a freelancer. For contractors employed through a contract for services, the requirement to submit an enhanced DBS check, or enhanced with barred list check, must be included on the contract. Their status will then be checked as part of a safe recruitment procedure. The individual will not be permitted to commence work until their disclosure has been approved. DBS checks will continue to be implemented a minimum of every 4 years during employment at Bletchley Park.

Volunteers

The need for an Enhanced DBS check, or Enhanced DBS with Barred List check, must be made evident when the volunteer role is created and to the volunteer before they agree to undertake that role/task. Volunteers, who are eligible for an enhanced DBS, or enhanced check with barred list, must be checked.

Selection and Interview

Applicants are informed of the need to undergo vetting procedures appropriate to the job role. Interviewees are required to supply documentation to confirm their identity. Photographic identity will be the preferred option, but if this is not available other verification of identity will be required. At least two satisfactory references will be required prior to any offer being made. Interviewees must supply original documentary proof of qualifications which they rely on to secure the job, including a recent Disclosure & Barring Service (DBS) Disclosure Certificate if they have one. A number of selection tools are used to maximise safe recruitment, including interviews, police checks and the uptake of references. Unexplained gaps on applicants' CVs will be identified and explanation sought during interview.

Work Experience Students under 18 years

BPT has a very limited offer of work experience placements to school pupils who are under the age of 18. Employers are not legally obliged to provide supervision of under 18 year olds by a member of staff who has had an enhanced DBS check barred list. However safeguarding standards and codes of practice must be followed. Arrangements must be made prior to the placement with appropriate risk assessment, contact details of the teacher and parent/carer in case of an emergency or issues arise.

Induction

All members of staff, volunteers and Trustees must read the *Safeguarding Children and Adults at Risk Policy and Procedures* as part of their induction and keep up to date with policy changes.

Data Storage and Record Keeping

Data is stored securely on password protected devices. Information about disclosures, lost children will only be kept as long as is required to pass information on to relevant agencies or when the situation is resolved. A record of action taken will be logged and shared only with those relevant to the case.

Allegations against staff will be kept on a confidential individual file until retirement or 10 years if that will be longer (this does not include allegations that were proved to be malicious).

Annex 5 - Code of Behaviour for Children and Young People

Children and young people should:

- Take responsibility for their own learning
- Cooperate with each other
- Be friendly
- Listen
- Help
- Respect each other's differences
- Treat staff, volunteers and other visitors with respect
- Report any concerns or worries

Children and young people should not:

- Bully each other
- Pick on or make fun of each other
- Be abusive
- Abuse equipment
- Litter

If the code is breached the child will be reminded of the code of conduct and asked to comply. They will be given an opportunity to reflect on their actions to plan a positive response. All behaviour is the responsibility of adults accompanying visiting groups.

If the behaviour persists and a member of BPT staff is delivering an unsupervised activity appropriate behaviour management systems need to be followed. Participants work with the facilitator at the start of projects and sessions to set expectations informed by the code of behaviour for children and young people.

If delivering activities in an outreach, community, education setting, BPT staff must follow the behaviour management systems of the organisation (e.g. mainstream school traffic light system). Consistency is important when managing behaviour.

Staff must not intervene in situations where they are not fully trained, for example under no circumstances should untrained BPT staff or contracted staff be left alone with vulnerable groups such as special needs groups or adults at risk and be expected to manage behaviour. A specialist trained adult/carer must be present to safeguard welfare.

Annex 6 - E-safety and digital images policy

Scope

This policy applies to members of the Bletchley Park Trust (BPT) community involved in learning visits and events (including staff, volunteers, visiting students and their teachers and family visitors) that have access to and are users of BPT IT systems whilst visiting Bletchley Park.

Roles and Responsibilities

Role	Key responsibilities
Nominated Safeguarding Officer in Learning Team (Online Learning Safety Officer)	<ul style="list-style-type: none"> • Trained in off-line and online safeguarding, in-line with statutory guidance • To maintain up to date knowledge of on online safety provision • Support staff and volunteers to receive suitable training to carry out their roles as required • To be aware of procedures to be followed in the event of a serious online safety incident • Log incidents and follow safeguarding procedures
Network technicians (T-tech, HR and Site Management team)	<ul style="list-style-type: none"> • To report online safety related issues that come to their attention to line manager or direct to a DSO • To manage the Trust's computer systems, ensuring: <ul style="list-style-type: none"> - password policy is adhered to - systems are in place for misuse detection and malicious attack (e.g. keeping virus protection up to date) - access controls/encryption exist to protect personal and sensitive information held on Trust devices - web filtering and monitoring is applied and updated on a regular basis
Learning department staff and volunteers	<ul style="list-style-type: none"> • To supervise and guide pupils carefully when engaged in learning activities involving online technology • To report any suspected misuse or problem to line manager /DSO • To maintain an awareness of current online safety issues and guidance e.g. through CPD • To model safe, responsible and professional behaviours in their own use of technology
Children, students and visiting staff, parents, carers, group leaders	<ul style="list-style-type: none"> • To understand the importance of reporting abuse, misuse or access to inappropriate materials • To know what action to take if they or someone they know feels worried or vulnerable when using online technology • To understand the importance of adopting safe behaviours and good online safety practice when using digital technologies

Communication

The E-Safety and Digital Image policy will be communicated to staff/students/community in the following ways:

- Policy to be posted on the Bletchley Park website and internal network.
- Policy to be part of induction pack for new learning staff and volunteers.

Staff and volunteers:

- Know to be vigilant in the supervision of students, together with accompanying teachers who are responsible for their group, during learning sessions or events, as far as is reasonable.
- Communicate clear instructions to students regarding the use of technology during learning sessions or events.
- Know to take professional, reasonable precautions when working with students, e.g. previewing websites and apps before use; using age-appropriate search engines if more open Internet searching is required.

Online Access by children, students and Teachers/Group Leaders

- Students/children and accompanying staff/guardians must only use equipment provided as directed by BPT staff.
- Teachers/group leaders/parents are responsible for supervising students/children at all times and their use of equipment.
- Participants in BPT's activities must not deliberately download, upload or browse offensive or illegal content. If this material is accidentally accessed it must be reported immediately to a member of BPT staff.
- Devices are not to be used to send material or to access social media.
- Devices must not be used to share personal data.

Incident Management

- BPT will take all reasonable precautions to ensure online safety.
- The Designated Safeguarding Officer acts as first point of contact for any incident.
- All BPT staff are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through the agreed processes.
- Support will be sought from other agencies as needed, for example, UK Safer Internet Centre helpline, CEOP, police and IWF, when dealing online safety issues.
- Accompanying teachers are specifically informed of online safety incidents involving young people for whom they are responsible.
- Any incident involving the personal device of any visiting member of a school party is the responsibility of their school staff, who will need to follow their own policies and procedures. Any incident involving the personal device of any child attending a learning event is the responsibility of their accompanying adult (e.g. parent). BPT cannot accept liability for incidents occurring on children's personal devices whilst visiting Bletchley Park.

- We take all reasonable precautions to ensure e-safety at all times. However, due to the international scale and linked nature of internet content, the availability of mobile technologies and the speed of change, it may mean that unsuitable material may briefly appear on a computer or mobile device owned by BPT. BPT cannot accept liability for material accessed or any consequences of this. Incidents should be logged and the appropriate procedures for managing an e-safety incident are to be followed.

Network Management

BPT in conjunction with network providers:

- Ensures all equipment owned by BPT and connected to the network has up to date virus protection.
- Maintains equipment to ensure Health and Safety is followed.
- Ensures that all IT and communications systems are installed professionally and regularly reviewed to ensure they meet health and safety standards.
- Blocks/filters access to social networking sites on devices intended for student use unless there is a specific approved educational purpose.
- Has an appropriate filtering system in place on devices intended for student use which blocks sites that fall into categories (e.g. adult content, race hate and gaming).

Social Networking

BPT staff will ensure that in private use:

- No reference should be made in social media to students, parents/carers, specific schools or school staff.
- BPT staff and volunteers should not become online friends with visiting students.
- Security settings on personal social media profiles should be regularly checked to minimise risk of loss of personal information.

Data Security

- Personal data and details relating to schools and students are handled and stored securely, sensitively and appropriately.
- We ensure staff know to report any incidents where data protection may have been compromised.
- Learning Managers, Officers and Session Leader staff employed in the learning department at Bletchley Park are Enhanced DBS checked and records are held in a single central password protected location.

Equipment and Digital Content

Mobile Devices (Mobile phones, tablets and other mobile devices)

- Mobile devices brought in to Bletchley Park are the responsibility of the device owner. BPT accepts no responsibility for the loss, theft or damage of personally-owned mobile devices.
- All users of learning sessions and events are requested to keep their phones on silent.

Digital Images and Video

- BPT may film, photograph, record or otherwise reproduce the image and/or voice of any person who enters Bletchley Park and use the same for any purpose, including promotional and commercial activities, without payment to any person. The same applies for individuals and organisations given permission to do so by BPT.
- If photographs of children are used on the Bletchley Park website or in other high profile publications, BPT will obtain permission through the parent/guardian for its long term, high profile use.
- If student photos are used on the Bletchley Park website or in other high profile publications, BPT will obtain permission through the school for its long term, high profile use.
- Staff and freelancers must not use their own personal devices to take photographs of children and young people. Learning delivery freelancers must refer to their terms of agreement/contract document.
- We do not identify children/students in online photographic materials or include the personal details or full names of students in any published materials.
- Photographers and filmmakers documenting work with children and adults at risk must have an Enhanced DBS check

Annex 7 - Useful Websites

Milton Keynes Safeguarding Childrens Board

<http://www.mkscb.org/>

Role of the Local Authority Designated Officer

<https://www.milton-keynes.gov.uk/children-young-people-families/children-s-social-care/the-role-of-the-lado-local-authority-designated-officer>

Milton Keynes Safeguarding Adult Board (MKSAB)

<http://www.miltonkeynesccg.nhs.uk/safeguarding-adults/>

Buckinghamshire Safeguarding Childrens Board

<http://www.bucks-lscb.org.uk/>

Buckinghamshire Safeguarding Adults Board

<http://www.buckinghamshirepartnership.co.uk/safeguarding-adults-board/>

The Government definition of Regulated activity for adults and children can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf 2012

Working Together to Safeguard Children

March 2015

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf

NSPCC

www.nspcc.org.uk

CEOP (Child Exploitation and Online Protection Centre)

<https://ceop.police.uk/safety-centre/>

Prevent Awareness

BPT DSO staff are not required to attend Prevent training.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

Social Care Institute for Excellence, Adult Safeguarding

<https://www.scie.org.uk/publications/elearning/adultsafeguarding/>

Parent Info (in collaboration with CEOP and The Parent Zone - information for carers, education providers on supporting children's safety, wellbeing and resilience)
www.parentinfo.org

NSPCC - Children's Legal Rights - Legal Definitions – www.nspcc.org.uk/preventing-abuse/child-protection-system/legal-definition-child-rights-law/legal-definitions/

Safer Internet - tips, advice and resources to support children and young people stay safe online www.saferinternet.org.uk

Annex 8 – Contacts

Designated Safeguarding Lead and Officers

DSL

Kate Travers, Head of Learning, 01908 272687, ktravers@bletchleypark.org.uk

DSO

Peter Snook, Duty Manager

Stuart Nicholls, Duty Manager

Steve Howkins, Duty Manager

Tom Briggs, Learning Manager

Catherine Holden, Learning Manager

Natasha Riley, Learning Outreach Officer

Simon Thompson, McAfee Online Safety Learning Officer

Michelle Parsley, HR Manager

External Organisation Safeguarding Contacts

Concern	Organisation	Contact details	
Concerned about a child or young person in Milton Keynes?	Local Authority	Contact Milton Keynes Multi-Agency Safeguarding Hub (MASH), Civic Offices ascats@milton-keynes.gov.uk Monday 8.30 - 5.00pm Emergency Social Work Team (out of hours)	01908 253169/70 01908 265545
Concerned about an adult working with a child?	Milton Keynes Safeguarding Children's Board	Contact Jo Clifford Local Authority Designated Officer, Galley Hill Education Centre lado@milton-keynes.gov.uk	01908 254373
If you are concerned a child is at immediate risk of harm?	Police	Contact Thames Valley Police	999
Do you require advice from the police or to report a crime?	Thames Valley Police Advice	Contact Thames Valley Police	101
Concerned about online safety?	CEOP	https://ceop.police.uk/safety-centre/ https://www.thinkuknow.co.uk/	

<p>Concerned or need advice about a child / young person in danger?</p>	<p>NSPCC</p>	<p>NSPCC https://www.nspcc.org.uk/ 'We will listen to your concerns, offer advice and support and can take action on your behalf if a child is in danger. You can remain anonymous.' https://www.nspcc.org.uk/what-you-can-do/report-abuse/</p>	<p>0808 800 5000</p>
<p>Concerned about an adult?</p>	<p>MK Social Care (Adults at Risk) MKSAB</p>	<p>Contact Milton Keynes Safeguarding Adult Board http://www.miltonkeynesccg.nhs.uk/safeguarding-adults/ Monday to Friday 8.30am to 5.00pm Out of hours Monday to Friday 5.00pm - 8.30am 24 hours weekends and bank holidays Emergency Social Care Team</p>	<p>01908 253772 01908 725005</p>