

# **BRITISH NATURISM**

## **CHILD PROTECTION POLICY**

### **1. INTRODUCTION**

1.1 This Policy applies to all activities of the Organisation where children and young people under 18 years of age are present, and to all working in such activities, whether as an employee, volunteer, EC Officer or otherwise.

### **2. OBJECTIVE**

2.1 The Objective of BN's Child Protection Policy is to contribute to the personal safety of all children using the facilities and resources of the Organisation, through actively promoting awareness, good practice and sound procedures.

### **3. IMPLEMENTATION**

3.1 BN shall appoint Child Protection Officers (CPO) from their Executive (EC) to include President, Youth Officer, Sports' Officer for all aspects of child protection awareness and implementation of this policy.

3.2 The CPO will be responsible for:

- a) ensuring that this policy is implemented throughout the Organisations activities;
- b) ensuring all necessary child protection-related enquiries, procedures and investigations are carried out;
- c) reporting results of screening enquiries and for preserving a "need to know" levels of confidentiality and access to secure records;
- d) ensuring secure and confidential records relating to child protection matters;
- e) liaison with the EC to ensure implementation of the policy by all members;
- f) liaison with police and social services at a formal and informal level on child protection matters.
- g) the reporting to meetings of the EC on the implementation of this policy;
- h) the reporting of allegations and suspicion of abuse to the appropriate authorities;
- i) ensuring there is adequate induction and training relating to child protection matters;
- j) ensuring that each activity carried out by the Organisation is sound in terms of child protection as regards personnel, practices, and premises.
- k) checking all incident reports made, countersigning them, and making such reference to authority as is appropriate.

All other officers, staff and voluntary workers of the organisation will actively endeavour to implement this policy.

### **4. PERSONNEL - CHECKS**

4.1 BN's aim is to ensure as far as is possible that anyone, paid or voluntary, who seeks to work with children and young people through the organisations activities and who gains substantial access to them thereby (whether within activity hours and/or beyond) is as safe to do so in child protection terms as can be guaranteed.

4.2 Therefore the CPO will ensure that the following checks are carried out on all prospective officers and volunteers whose work may create a situation of substantial access to children and young people:

criminal records check via CRB

4.3 The written consent of the applicant must be obtained to enable such enquiries to be made. No application may proceed unless the applicant gives such consent.

**4.4 BN's policy is to check all CPOs and EC Officers annually with the exception of Youth and Sports Officers who will be checked twice yearly.**

4.5 At all times the onus is on the individual to reveal any conviction, caution, bind-over, probation order, or pending prosecution, whether imposed prior to or within the period the applicant works on BN activities.

4.6 The applicant shall produce proof of identity, preferably passport or photographic, and of residence, as required by the CRB, which checks the CPO shall note as having been undertaken in the applicant's records.

4.7 The CPO will not accept any previous reference, police check, social services endorsement etc provided by an applicant in substitution for the above enquiry process. At all times the initiative must lie with BN to make its own, completely independent enquiries.

**5. REPORTING OF ENQUIRY RESULTS**

5.1 The CPO will indicate to the EC whether an applicant is suitable to work on BN activities, as revealed by the results of the checks at 4.2 a above.

5.2 Where a Schedule One offence is indicated by the above process, the CPO must rule an applicant unsuitable, and that person must not undertake any form of work or help with children or young people. If such an attempt is made by a convicted Schedule One Offender or by any person prohibited under legislation from working with children and young people or from being in proximity to places where they may gather etc, the CPO shall immediately inform the Police and Social Services.

5.3 The CPO will recommend at meetings of the EC on the acceptance or otherwise of applicants. No details other than an applicant was accepted or otherwise shall be given or minuted.

5.4 Any discrepancies revealed between the applicant's statements and the replies must be investigated thoroughly with the applicant by the CPO, especially as regards dates of residence, employment, voluntary work, past offences and convictions. In particular, the applicant should be advised as to the necessary procedures s/he can take if s/he queries the accuracy of a reference or check. The replies given may be taken into account by the CPO, in making a recommendation to the EC as at 5.3.

5.5 The CPO shall be authorised to undertake any additional enquiries as sanctioned by the applicant as may assist the making of a recommendation to the EC.

**6. PERSONNEL RECORDS**

6.1 The CPO shall maintain a confidential file on each applicant in which shall be kept:

- a. copies of all forms, consents and replies as in paragraph 4.2 above;
- b. a progress check form indicating progress of the checks and replies;
- c. notes for file - where the CPO receives a phone call or other non-written communication, the main points shall be recorded and filed with the applicant's records.

6.2 The file of an unsuccessful applicant shall be kept for six months and then safely destroyed by the CPO.

6.3 Anyone working within BN has the right to inspect their own confidential records as at 6.1 above, and may do so on request to the CPO who shall not withhold consent unreasonably. The CPO may only withhold such agreement and access if to do so might jeopardise a Project or police or social services investigation relating to child protection matters or might lead to a child's welfare and safety being compromised. The CPO

need give no reason for such withholding of consent. S/he will report such a situation to the EC, purely on the lines that a request was made and refused for reasons relating to the welfare of children.

## **7. ACTIVITIES**

7.1 Prior to any activity /programme being commenced, the CPO shall ensure that adequate child protection procedures are in place.

7.2 The CPO shall ensure a site audit is undertaken to ascertain the layout of premises/site, helpers and supervision required to achieve adequate personal safety of children and young people. The audit shall be undertaken with a view to recognising any problems in terms of e.g. supervision of helpers, extended sites creating communications concerns etc. There may be a need to audit an existing site etc if; in the opinion of the CPO there have been significant changes since the last use of that site.

7.3 As a basic principle, no helper should work with less than three children on their own for any period longer than 10 minutes, and where possible each room should have two or more helpers and/or regular visits, at not less than 5 minute intervals. Regulations as regards helper: child ratios shall be observed.

**7.4 All sessions shall be conducted with the provisions, aims and objective of this policy in mind.**

7.5 Every activity shall be undertaken with the possibility in mind that a child may be suffering abuse outside BN, that a disclosure or symptom relating to this may become apparent within a BN activity, or that there will be children present who have not as yet revealed they are being abused. It is important that the environment created for a BN activity is as conducive to support of a child in such a situation as is possible.

7.6 For their own protection, but mainly as good practice and good manners, helpers are advised that children should initiate physical contact with helpers - this will not apply e.g. where a child needs to be removed from a situation threatening its or others' safety.

## **8. REPORTING OF CONCERNS**

8.1 Those working on BN activities have a duty to ensure that any suspicion, incident, allegation or other manifestation relating to child protection is reported as provided below.

8.2 Disclosure or evidence for concern may occur in any number of ways. This may be by what a child says, about itself or another child or children. It may be through interception of a written item, or through observation of activity or behaviour giving cause for concern. It may be through changes in behaviour or attitude. There may be physical, emotional pointers such as bruising, staining, inappropriate behaviour or knowledge. These and many other signs can be picked up by workers.

**8.3 IT IS VITAL FOR THE SUCCESSFUL OPERATION OF THIS POLICY THAT ALL INCIDENTS, OBSERVATIONS, HOWEVER INSIGNIFICANT-SEEMING, ARE LOGGED BY THE OBSERVER (S) IN AN APPROPRIATE ACCIDENT AND INCIDENT REPORT BOOK/FORMS.**

8.4 The observing worker, paid and voluntary, will make a verbal report to the CPO, and also will make a written report outlining in adequate detail what was heard, seen, reported, alleged etc. Verbatim quotes from a child are important, as is the retention of anything, which gave cause for concern such as a drawing, painting, writing etc. The worker will sign and date the report. The CPO will countersign the report, with any comments/ recommendations completing the form with comments etc as appropriate.

8.5 If more than one worker has an observation on the same incident on the day in question, a separate report is to be made by each worker and treated as above.

8.6 At the same time, opportunity must be made to discuss the matter and will note any matters that should be taken forward from the discussion.

**- THE BASIC PRINCIPLE IS THAT THERE CANNOT BE TOO MUCH DETAIL OR DISCUSSION WHERE THE PROTECTION OF CHILDREN IS CONCERNED.**

8.7 Many reports will be purely minor in nature. It is important to treat them with due seriousness, as there may already exist information within BN concerning a child or e.g. a related child.

8.8 BN will ensure the CPO has as much background, supplementary detail about a child or an incident as possible. The CPO will keep records in such a way as will enable appropriate cross-referencing of reports. The object is that any persistent pattern is identified as soon as possible.

8.9 After discussion with workers as in 8.6 above, where the matter is serious enough the CPO who will either attend the meeting or make arrangements to meet the relevant people together as soon as possible. The CPO **MUST** attend if there is a serious level of allegation or evidence of abuse, which may endanger a child or children.

8.10 At such a meeting that the CPO will chair and is minuted, the evidence and concerns will be reviewed and the CPO will consult in making a decision on action. The CPO will also consult any previous, relevant records. The CPO will record his/her decision by a memorandum, copy to the EC and copy filed in the appropriate restricted files.

8.11 The CPO will take an appropriate course of action as follows:

**a. Immediate Report to Police and/or Duty Officer at Social Services:** this covers any situation where, in the judgement of the CPO, after due consultation with the workers involved and EC there is perceived to be an immediate danger to a child or detection of criminal offences against a child or other form of obvious, ongoing/future/recent serious harm. Where a child seems at imminent harm of danger/ injury or worse, then the CPO is authorised to make a complaint to the Police in order to secure immediate action and protection of a child. **NO PROTOCOL SHOULD EVER INHIBIT THIS COURSE OF ACTION IF IT IS TRULY WARRANTED.**

**b. In exceptional cases, where action under a. above seems unable to guarantee child's welfare which appears to be under serious and imminent threat, the CPO and the Officers of the EC that can be quickly located, should consider direct action through obtaining of a suitable order through the Court.**

**c** Most situations will not require reference as in a. or b. above. It will be more appropriate for the CPO to raise them informally with a designated liaison contact at the Police or Social Services. The CPO will always strive to ensure that there is such an informal liaison arrangement so that concerns can be discussed informally and on a regular basis. It will be appropriate at such informal meetings for all recent reports to be copied to the liaison person.

**d** There may quite often be situations arising from the reporting process which will not require the urgent formal reporting of a. or b. above but where it will not be appropriate to wait until a liaison meeting as in c. In such circumstances the CPO should never hesitate to contact their liaison person on an informal basis as soon as possible. Such situations may arise e.g. where there is insufficient hard evidence or facts to warrant a complaint/ urgent formal referral, but there may be enough in terms of e.g. previous reports to justify referral of concerns in an informal manner.

8.12 **The point of making informal reports as in 8.11 above should not be under-estimated.** It may well be that, from a child protection viewpoint, the information given in a piecemeal manner, informally, is potentially a major way of picking up issues as they develop. Our piece of information may be one part of a jigsaw - it may even be the first piece. It may complete "a puzzle".

8.13 The CPO, and all members, should bear in mind that in this case we may not be privy to all or indeed much information about a given child's situation, as held by the Police or Social Services - but our item of information may assist in promoting a child's welfare

## **9. FEEDBACK AND REPORTING**

9.1 Workers will always wish to be assured that, having made a report, appropriate action has been taken. The CPO should always attempt to give such feedback from a reporting situation as is appropriate. The CPO him/herself may be short on information once a report has been made to the Police or Social Services, who for reasons of confidentiality may be unable to give specific details.

9.2 In giving any feedback, the CPO has to bear in mind "need to know" and confidentiality. So, the worker who made a report can be told what action has been taken by the CPO including any representations that e.g. the police should be brought in etc.

9.3 In regular reports on child protection matters to the EC, the CPO will report:

- all new applicant's results of police and other checks: the person's name and whether the checks were satisfactory or not (but without giving detail).
- any formal report to the Police or the Duty Social Worker, omitting children's and families' names; also any informal report made by the CPO to Police or Social Services via our liaison with them.

## **10. ALLEGATIONS AGAINST EC MEMBERS**

10.1 If a child or parent makes allegations to BN or a Club against a member of the EC, the following procedure will come into force - incident reports will be made at all stages as appropriate:

a. The person receiving the complaint will contact BN who on receipt of the complaint will contact the Police or Social Services to apprise them of the situation. Normally this will be by informal channels but if there is a criminal allegation, the contact will be formal.

**b. BN should inform the person against whom an allegation has been made as soon as possible UNLESS THERE APPEARS TO BE A CASE THAT THIS MIGHT PREJUDICE A CRIMINAL INVESTIGATION.** This will require consultation with the police to ascertain.

10.2 The course of action to be taken from thereon will be decided by the nature of the allegation(s).

a If a criminal allegation e.g. of sexual abuse and impropriety is made, or physical assault, or inappropriate behaviour, BN will activate the Disciplinary Procedure and suspend the person from any activity under the heading of alleged Gross Misconduct. The matter must then be reported immediately to the police and duty social worker. An incident report will be made and treated as confidential.

b If there is no criminal allegation the CPO will gather as much detail from available sources of information as possible, by way of investigation, but not including seeking to interview any child if there is a criminal allegation (which is a matter for the authorities). The CPO should examine to see if there is any company report relating to a child protection matter concerning any involved child. This is most important. Where appropriate, the CPO should consider whether suspension is advisable and recommend accordingly to the EC. This may include a situation, which though non-criminal, could lead to a decision of gross misconduct.

c The CPO will report to the EC on the outcome of such an investigation and will recommend whether the circumstances constitute grounds either:

A. to treat the matter as a disciplinary issue, either as misconduct or gross misconduct, with associated rights of appeal

or B. to dismiss the allegations as unfounded, or to make such other non-disciplinary recommendations as are appropriate.

The person against whom such non-criminal allegations are made should have opportunity to give an explanation or answer to any allegation at an interview conducted by the CPO and the course of such an interview should be minuted.

d. In the case of 10.2 b above the suspension will remain in force on completion of the CPO's enquiries if the EC is of the view that the misconduct is so serious as to constitute grounds for immediate termination of membership.

e. In the situation of 10.2 a above, if legal proceedings result in the conviction of the person for a serious offence involving a child, membership will be terminated and the name of that member will be included on the referral list.

f. In the situation of 10.2 b above the General Secretary shall write to the person concerned to inform them of the outcome of the investigation and will inform the person of any decision to terminate employment or of the date and conditions, if any, of a return to duties, where a disciplinary offence has been committed but is not of a nature as to warrant immediate termination of membership.

**g. Under no circumstances is any person suspended to re-enter BN premises or property whilst under suspension. This prohibition includes activities where there are no children/ young persons present.**

h. In appropriate circumstances, the CPOs may effect an instant dismissal if the evidence warrants it. For example, someone caught in the act of committing an offence involving a child on BN property or at a BN event. This will be reported in the manner detailed above, and the CPO will make the appropriate reference to the Police and/or Social Services. The personal file of such a member will have the necessary note of action taken entered in it.

- i. Lesser forms of misconduct involving a member in a child protection incident where the member's actions or behaviour are inconsistent with children's welfare should be reported and dealt with under the ordinary Misconduct provisions of the Disciplinary Procedure, with appropriate records made in the person's file. Police and/or Social Services should be informed if the matter is related to child protection, and it is possible they may express a view on the person's suitability to continue to be a member. Each case will be individual, judged on its own merits.
- j. Where the Police are called in, the provisions of Terms and

Conditions as regards e.g. interviews with workers etc and children apply.

## **11. INDUCTION AND TRAINING**

11.1 BN shall ensure that there is adequate and appropriate induction and ongoing training and information to all employed staff and voluntary workers concerning child protection matters, which shall be the responsibility of BN to devise and implement, in consultation and liaison with the CPO. All officers, employees and voluntary workers shall have this policy drawn to their attention on joining BN.

## **12. REVIEW OF THIS POLICY**

12.1 The EC shall review this policy, its effectiveness and regarding its implementation every two years and the CPO shall ensure that views, are sought and reflected in such a review process, and that any statutory authority input is sought as appropriate.