ECPAT UK

Safeguarding and Child and Young People Protection Policy

Updated 25th July 2019 by Debbie Beadle
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Designated Child Protection and Safeguarding Lead is:

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07846842738
Definitions

The policy applies to children and young people ECPAT UK works with.

Child - For the purposes of this policy, a “child” is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child.

Young person - persons between the ages of 15 and 24 who is or may be in need of care services by reason of trafficking or abuse and who is or may be unable to protect him or herself against significant harm or exploitation.

Child Protection
A broad term to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm. In the current context, it applies particularly to the duty of organisations – and individuals associated with those organisations – towards children in their care.

Child Abuse
- According to the World Health Organisation, “Child abuse” or “maltreatment” constitutes ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.’
- NSPCC similarly specify “cruelty to children” or “child abuse” as ‘behaviour that causes significant harm to a child. It also includes when someone knowingly fails to prevent serious harm to a child. All forms of cruelty are damaging – it can be harder to recover from the emotional impact than from the physical effects.’
- These definitions therefore point to four types of cruelty:
  - Physical abuse: including hurting or injuring a child, inflicting pain, poisoning, drowning, or smothering.
  - Sexual abuse: including direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.
  - Emotional abuse: repeatedly rejecting children, humiliating them or denying their worth and rights as human beings.
  - Neglect: the persistent lack of appropriate care of children, including love, stimulation, safety, nourishment, warmth, education, and medical attention.
- A child who is being abused may experience more than one type of cruelty.
- Discrimination, harassment, and bullying are also abusive and can harm a child, both physically and emotionally.

Online Abuse
Online abuse is any type of abuse which happens on the internet. This can happen on any devise which has internet access. The abuse can happen over social media. Text messages and messaging apps, emails, online chats, online gaming, live streaming sites.

Direct Contact with Children
Being in the physical presence of a child or children in the context of the organisation’s work, whether contact is occasional or regular, short or long term. In the UK, this could involve delivering talks to schools, churches and youth groups. Overseas this could involve project / site visits and attending conferences at which children are also present. [N.B. this list of examples is not exhaustive].

Indirect Contact with Children

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1) Having access to information on children in the context of the organisation’s work, such as children’s names, locations (addresses of individuals or projects), photographs and case studies.

2) Providing funding for organisations that work ‘directly’ with children. Albeit indirectly, this nonetheless has an impact on children, and therefore confers upon the donor organisation responsibility for child protection issues.

[N.B. this list of examples is not exhaustive].

Policy

‘A statement of intent that demonstrates a commitment to safeguard children from harm and makes clear to all what is required in relation to the protection of children. It helps to create a safe and positive environment for children and to show that the organisation is taking its duty and responsibility of care seriously.’

What is a Child Protection Policy?

A Child Protection Policy provides a framework of principles, standards and guidelines on which to base individual and organisational practice in relation to areas such as:

- Creating a ‘child safe’ and ‘child friendly’ organisations (in relation to environmental safety as well as protection against physically, psychological and sexual abuse)
- Prevention of abuse
- Guidelines of appropriate and inappropriate behaviour/attitude
- Personnel recruitment and training
- Recognising, reporting and reacting to allegations of abuse
- Guidelines for communications regarding children

This policy is not solely directed towards sexual abuse, but encompasses all aspects of child protection including, but not limited to: disciplinary measures, health and safety measures, physical harm, working with information about children, proper recruitment and managerial procedures, and the ramifications of misconduct.

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3 Setting the Standard: A common approach to Child Protection for international NGOs, Standard 1 (Policy).
ECPAT UK: Child Protection Policy

1. Introduction

ECPAT UK’s work with children is based on the UN Convention on the Rights of the Child, and the best interests of the child principle. The protection of children from all forms of abuse is of prime importance to ECPAT UK and is considered both a corporate and individual responsibility. Everyone who works for ECPAT UK must take all possible precautions to protect the children with whom they come into contact. The key ethical consideration for ECPAT UK representatives in working with children is ‘do no harm’.

Many of the children with whom ECPAT UK works suffer serious abuse by the nature of the conditions that we are working to end (e.g. commercial sexual exploitation, forced labour, forced criminality etc). This policy, and its reporting requirements, is primarily intended to be a conduct policy for representatives of ECPAT UK and includes process for observation of children. The level of intervention that may be appropriate in such situations will be a matter of judgement, but will be guided by these principles.

Additionally, this child policy will enable a standardised process within ECPAT UK in relation to the recruitment of employees, contractors, trustees, interns and volunteers, who have direct or indirect contact with children.

2. Code of Behaviour for Representatives of ECPAT UK

The following code of behaviour is designed to protect children, but is also intended to protect adults from false accusations of inappropriate behaviour or abuse. This code applies to all trustees, staff, volunteers and consultants (hereafter referred to as Representatives of ECPAT UK), especially those working directly with children and when travelling within the UK and overseas. Failure to comply with this policy constitutes gross misconduct within the terms of the contract of employment.

2.1 Representatives of ECPAT UK SHOULD:

- treat all children and young people with respect
- provide an example of good conduct that you wish others to follow
- ensure that whenever possible there is more than one adult present when interacting with a child or young person, or at least that you are within sight or hearing of others
- have a staff ratio of one adult to six children under 18 for all group activities
- respect a young person’s right to personal privacy
- be aware that even physical contact with a child or young person may be misinterpreted
- recognise that special caution is required in moments when discussing sensitive issues with children or young people
- challenge unacceptable behaviour and report all allegations/suspicions of abuse
- recognise that caution is required in all one-to-one situations
- be aware of the power balance between a child and an adult
- be aware of the potential for peer abuse between children
- provide access for children and young people to talk to others about any concerns they have
- remember that someone else may misinterpret your actions, no matter how well-intentioned
- never place a child at risk of abuse through actions or words
- not trivialise or exaggerate child abuse issues
- not make suggestive remarks or gestures, even in fun
- not behave in a way or use language that is discriminatory on the grounds of race, culture, age, gender, disability, religion, sexuality or political persuasion

2.2 Representatives of ECPAT UK MUST:

- never hit or otherwise physically assault or physically or emotionally abuse children and young persons;

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4 The above seven points are taken from NSPCC ‘Stopcheck: A step by step guide for organisations to safeguard children’.
5 It must be noted that this list is not exhaustive.
• never develop physical/sexual relationships with children

3. Employment of ECPAT UK Staff, Trustees, Contractors, Consultants and Volunteers

ECPAT UK will identify staff posts in which direct or unsupervised contact with children is possible or likely and ensure that extra care is taken in dealing with applications for such posts. Candidates will be selected for interview; be interviewed against a scoring system relevant to role; be asked to describe their previous experience of working with children; will provide two referees who can comment on their work with children; provide a self-declaration form about criminal convictions and complete the Disclosure and Barring Service (DBS) checks. These were previously the Criminal Records Bureau Check (CRB). [https://www.gov.uk/disclosure-barring-service-check/overview](https://www.gov.uk/disclosure-barring-service-check/overview).

4. Child Protection and ECPAT UK’s Partners

Although ECPAT UK does not currently work regularly with international partners, it is an area of work that will be done from time to time. Translating child protection policies across different contexts and cultures can be difficult. However, despite varying legal and cultural frameworks, ECPAT UK is committed to ensuring that the protection of children is paramount in its work, and in the work of its partners. ECPAT UK recognises that to be most effective, child protection policies need to be instigated and implemented by local organisations, rather than imposed. ECPAT UK is committed to providing partners support and assistance with this process.

ECPAT UK, through its representatives, will ask new partners what measures they have in place for the protection of children, and (where they are not already doing so) will encourage them to address child protection issues in their organisations and in the communities in which they work. ECPAT UK will work with partners to develop child protection policies. All partners will be made aware of the provisions of this policy and asked to confirm their agreement with the principles contained in the policy, and to accept the importance of implementing child protection policies and safeguarding procedures.

Representatives of ECPAT UK, in the course of their work, should support partners in their efforts to increase their awareness, knowledge and skills in relation to child protection issues. Since many partners have significant expertise in this area representatives of ECPAT UK should also be receptive in learning from the experience of partners in these issues.

4. Education, Training and Designated Staff

ECPAT UK will ensure that staff, trustees, contractors and volunteers are aware of the Child Protection Policy and safeguarding procedures and have access to a copy. On induction all staff and volunteers will be trained in safeguarding by the designated safeguarding lead (Debbie Beadle). Additionally, staff will receive an updated safeguarding training at least once a year.

Within ECPAT UK a designated member of staff will be made responsible for the implementation of the child protection policy, and in ensuring that all staff, trustees, contractors and volunteers are aware of the policy and reminding them of its provisions when the need arises. ECPAT UK CEO carries the responsibility for the Implementation of Child Protection Policy.

Designated Safeguarding Lead is Debbie Beadle, Director of Programmes d.beadle@ecpat.org.uk 07846842738

4. Raising and Reporting of Child Abuse or Breaches of this policy

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6 For the purposes of this guidance, children refers to those under 18. In UK law a child over 16 may consent to a sexual relationship and marriage. Representatives of ECPAT UK may not enter such relationships with children under the age of 18 who they come into contact with through their work for ECPAT UK, regardless of the consent of the child, or the legal status of the relationship.

7 It is not anticipated that volunteer posts will involve significant unsupervised direct contact with children. CRB checks will not be conducted for staff employed for less than three months, and who will not have direct contact with children.
Abuse, or suspicion or abuse or breach of this policy by ECPAT UK representatives must be reported in the following instances:

- If abuse is observed or suspected
- If an allegation of abuse is made
- If a child discloses abuse

All representatives of ECPAT UK should be alert to signs that may suggest a child is in need of help.

No representatives of ECPAT UK will prejudice their own position or standing with ECPAT UK solely by responsibly reporting potential or suspected child abuse.

If any representatives of ECPAT UK breaches any of the provisions of this code they should immediately inform their line manager and or the CEO of the incident, including all the circumstances, the CEO must be informed and a record of the report must be made and kept. The CEO will decide what further actions are appropriate to take.

If any representatives of ECPAT UK suspects abuse, or if a child makes a disclosure, the following process should be followed.

1) If the child is in immediate danger staff member must call the police on 999
2) Any concerns should be reported immediately to the safeguarding Lead (Debbie Beadle) and CEO (Katherine Mulhern)
3) Staff should fill out the safeguarding or Near Miss Incident report form found [here](S:\Safeguarding) which should be completed, signed and dated and passed to the safeguarding lead and CEO
4) The safeguarding lead will keep a record of the report, and decide what further action (including as appropriate further investigation, disciplinary procedures, or reporting to the police or sign posting to other organisations) to take. It is important to note that where representatives report concerns, it is not their responsibility to decide whether or not abuse is taking place, but it is their responsibility to pass these concerns on.

Particular care will be taken in regard to confidentiality and the sharing of information with appropriate people.

It is ECPAT UK’s policy to report any confirmed cases of child abuse to the police in the UK, or other relevant national authorities. ECPAT UK is required by law and government guidance to respond to all concerns, allegations or suspicions by reporting them to the local police and or the social services department. Failure to do so may result in a child continuing to be abused.
ECPAT UK Staff and volunteers should not use the Internet to investigate child or adult pornography. This includes:

- visiting child or adult pornography or pornography sites
- downloading child or adult pornography
- visiting chat rooms or newsgroups with a pornography interest

ECPAT UK Staff and Volunteers should not use the Internet to browse or search on issues that contravene the principles of ECPAT UK's work.

Any information on 'leads' sent to ECPAT UK regarding child or adult pornography sites should not be investigated but sent directly to the Internet Watch Foundation.

Personal use of the Internet (for checking hotmail addresses for example) should not exceed 15 minutes per day.

ECPAT UK staff and volunteers should be aware that Internet use through ECPAT UK computers is monitored.

**Action taken on inappropriate use of the Internet**

If any incident following investigation reveals that an ECPAT UK staff member or volunteer has used the Internet inappropriately, disciplinary action will be taken which may result in summary dismissal.
Appendix 1

Disclosure and Barring Service (DBS) checks (previously CRB checks)

The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) have merged to become the Disclosure and Barring Service (DBS). CRB checks are now called DBS checks for:

- certain jobs or voluntary work – e.g. working with children or in healthcare
- applying to foster or adopt a child

There are different rules for getting a criminal record check in Scotland and Northern Ireland.

Documents the applicant must provide

The person going through a DBS check (the applicant) must give ECPAT UK, or their employer (if not employed by ECPAT UK) original documents to prove their identity (not copies). The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

**Route 1** – The applicant must be able to show:
- 1 document from Group 1, below
- 2 further documents from either Group 1, or Group 2a or 2b, below

At least 1 of the documents must show the applicant’s current address.

**Route 2** – If the applicant doesn’t have any of the documents in Group 1, then they must be able to show:
- 1 document from Group 2a
- 2 further documents from either Group 2a or 2b

At least 1 of the documents must show the applicant’s current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

**Route 3** – can only be used if it hasn’t been possible to process the application through Routes 1 or 2. For Route 3, the applicant must be able to show:
- a birth certificate issued after the time of birth (UK and Channel Islands)
- 1 document from Group 2a
- 3 further documents from Group 2a or 2b

At least 1 of the documents must show the applicant’s current address. If the applicant can’t provide these documents they may need to be fingerprinted.

For details of the documents required under the different routes see - [https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide](https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide)
International Child Protection certificate

The International Child Protection Certificate (ICPC) is a criminal records checking mechanism developed jointly by the Child Exploitation and Online Protection Centre (CEOP) of the National Crime Agency (NCA), and the Association of Chief Police Officers (ACPO) Criminal Records Office (ACRO) in 2012.

Under this procedure, institutions abroad may require individuals (UK nationals or previous UK residents) to apply for a check similar to the Disclosure and Barring Services (previously known as Criminal Records Bureau) checks carried out in the UK before accepting applications for employment from persons who will be working with children. The ICPC check is carried out by CEOP, against police and intelligence databases in the UK, and reveals any prior convictions or factors that should prevent an individual from working with children, based on which CEOP will decide whether to issue a certificate to that individual.

Whilst ICPC is not yet a mandatory procedure, it should be encouraged as best practice. The cost has to be borne by the applicant.

The ICPC procedure is an invaluable tool in the fight against transnational child exploitation and abuse. As such, organisations involved in child protection activities should work on awareness raising on the ICPC procedure in destination countries, highlighting the need for this international criminal records checking mechanism, in order to ensure that persons with previous convictions, who are not suitable to work with children, are not employed in jobs where they will pose a potential threat to vulnerable children. Awareness raising campaigns would be targeted towards institutions that work with children, such as orphanages and schools, and also with the governments in destination countries, with the possible aim of making these checks mandatory at a legislative level.

For further details [http://www.acro.police.uk/icpc/](http://www.acro.police.uk/icpc/)
Annex 3

Guidelines for Staff and Other Representatives of ECPAT UK

Involving children and young people in advocacy: some do’s and don’ts

The following are guidelines to ECPAT UK staff in organising events or activities involving children.

The key ethical rule when involving children and young people in advocacy is ‘Do no harm’. The best interests of the child are paramount. This means:

1. Protect children or young person from any additional risks
2. Respect children’s and young person’s dignity
3. Ask permission of child or young person to use their stories, pictures or participation (not just the permission of adults/guardians/child advocates, even if they are present); Explain and seek permission, as far as is possible, for the way in which these will be used (e.g. for fundraising, campaigning, abroad or in country)
4. Try to ensure that children and young people fully understand the nature and consequences of giving permission, and that the consent they give is informed. This means assessing whether they are in a position to understand, and has understood, the nature and consequences of what is being asked
5. Respect children’s and young people’s decisions if they refuse to be interviewed or photographed
6. Use the best possible information; i.e. that is accurate, not distorting, respectful and truthful
7. Do not use negative, degrading or stigmatising images of children, either in pictures or in words
8. Do not identify individual children or young person or groups of children unless they have given their permission and you can be sure that they will be protected from further exploitation
9. Do not exaggerate, or use unnecessarily emotional language
10. Do not make promises to children and young people that you cannot keep
11. Do not raise expectations you cannot fulfil

Remember the dangers:

In involving children and young people in advocacy we have to avoid the real possibility that they are harmed through their participation. The following are examples of the ways that participation can negatively affect children and young people:

- Adults may exact retribution for the child and young person speaking out. For example, employers, potential employers, teachers, landlords may dismiss, take action against the child or physically abuse a child who is identified in an article or photograph.

- Individual children and young people may feel ashamed about having their stories or photographs used to illustrate articles about them as victims. Children and young people can be stigmatised by stories about them that suggest they are all sexually abused, or that they come from poor families;

- Children and young people are given unrealistic expectations of how their situation might improve as a result of their advocacy, and feel let down as a result

- Do not reinforce stereotypes that should be challenged.

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8 This is not part of the formal child protection policy, but guidelines only. Taken from Anti-Slavery International. Adapted from: Child Labour: Getting the message across, Judith Ennew and Dominique Plateau (Regional Working Group on Child Labour, 2001)
Annex 4

Safeguarding Concern Form⁹

If you have knowledge that a child’s safety might be in danger, please complete this form to the best of your knowledge. Please note that child protection concerns must be reported directly to the designated contact person immediately (preferably within the same working day). You may wish to complete this form before contacting the designated person in your organisation’s reporting process or you may wish to complete the report after contacting the designated person. This report is to be used as a tool to develop the most un-biased information-based report possible. For confidentiality reasons, the report should be written and signed solely by you. It should only be sent only to the designated contact person. It will be held in a safe and secure place and treated in the strictest confidence.

Designated contact person is Debbie Beadle d.beadle@ecpat.org.uk 07846842738

1. About You

Your name: _________________________________________________________

Your job title: _______________________________________________________

Workplace: _________________________________________________________

Your relationship to the child: _________________________________________

Contact details: ____________________________________________________

2. About the Child

Child’s name: ______________________________________________________

Child’s gender: _____________________________________________________

Child’s age: _________________________________________________________

Child’s address: ____________________________________________________

Child’s guardians: _________________________________________________

3. About your Concern

Was the abuse observed or suspected? _________________________________

Is this concern based on first hand information or information divulged to you by someone else? (If so who?) __________________________________________________________

Did the child disclose abuse to you? _________________________________

Date of the alleged incident: _________________________________________

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⁹ Based on tools and resources from Child Protection Policies of SENSE International and Tearfund.
Time of the alleged incident: ________________________________

Location of the alleged incident: ________________________________

Name of alleged perpetrator: ________________________________

Job title: ________________________________

Nature of the allegation: ______________________________________

Your personal observations (visible injuries, child’s emotional state, etc.) [N.B. Make a clear distinction between what is fact and what is opinion or hearsay]

Exactly what the child or other source said to you [if relevant] and how you responded to him or her: [Do not lead the child. Record actual details]

Any other information not previously covered:

Were there any other children/people involved in the alleged incident? ______________________________________

Action Taken:

Signed: ______________________________________

Date: ______________________________________
Annex 5

This form must be completed by an ECPAT UK member of staff

ECPAT UK – INCIDENT/NEAR MISS FORM

A. WHAT IS BEING REPORTED?

☐ ‘Near Miss’ - incident involving no injuries or damage ☐ Dangerous Occurrence (as defined under RIDDOR)
☐ Damage to equipment or premises ☐ Fire

B. DETAILS OF PERSON MAKING REPORT

<table>
<thead>
<tr>
<th>Family Name:</th>
<th>Other Names:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job Title:</td>
<td>Building:</td>
</tr>
<tr>
<td>Tel No:</td>
<td>Email:</td>
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</tbody>
</table>

C. INCIDENT DETAILS

<table>
<thead>
<tr>
<th>Date:</th>
<th>Time (use 24hr clock)</th>
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</thead>
<tbody>
<tr>
<td>Location:</td>
<td></td>
</tr>
<tr>
<td>Public place?</td>
<td>Location:</td>
</tr>
</tbody>
</table>

DESCRIPTION OF INCIDENT Give full details of what happened including the nature and extent of any damage which may have occurred.

ACTION TAKEN FOLLOWING INCIDENT

☐ Safeguarding Incident: Any situation involving children, young people, vulnerable adults which could be a safeguarding incident

Continue overleaf if necessary
**D. RESPONSIBLE PERSON** *This form must be countersigned by the supervising member of staff*

<table>
<thead>
<tr>
<th>Signed:</th>
<th>Date</th>
</tr>
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<tbody>
<tr>
<td>Name (please print):</td>
<td>Tel No:</td>
</tr>
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</table>

**WITNESSES**

<table>
<thead>
<tr>
<th>Signed:</th>
<th>Date</th>
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<tbody>
<tr>
<td>Name (please print):</td>
<td>Tel No:</td>
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<tr>
<td>Organisation:</td>
<td>Role:</td>
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<tr>
<td>Signed:</td>
<td>Date</td>
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<td>Name (please print):</td>
<td>Tel No:</td>
</tr>
<tr>
<td>Organisation:</td>
<td>Role:</td>
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</tbody>
</table>

**Data Protection Act 1998** – the information on this form is used for the purposes of investigation and securing the health, safety and welfare of people at work. It is held by Health and Safety Services staff. Any queries about data protection issues should be addressed to the CEO ECPAT UK

**Lessons Learned**

**Recommendations**