

OXFAM GB

Safeguarding Children Procedures - Retail

September 2021

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| Title: | Safeguarding Children Policy - Retail |
| Author: | Safeguarding Manager Retail |
| LT Sponsor: | Clifford Isabelle |
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| Confidentiality: | Public |

Policy Statement

This policy is for Oxfam Retail and specifically for Oxfam Shops. It applies to all paid staff and volunteers or anyone working on behalf of Oxfam Retail.

Oxfam is committed to the safeguarding of all children and young people with whom it has contact. The Children Act 1989 defines a child as **under** 18 years of age and makes it clear that the welfare of the child is paramount and that everyone involved in the care of children has a responsibility for the protection of those children from harm. All children, regardless of age, sex, disability, sexual orientation, race, marriage or civil partnership, gender reassignment, pregnancy or maternity, religion or belief have a right to be protected from all forms of harm, abuse, neglect and exploitation.

1. Purpose of the policy

2. Definitions

3. Legal Framework

4. Safeguarding Children Procedures

5. Useful Contacts

Appendix 1 – Oxfam Retail Safeguarding Procedure Flowchart

1. Purpose of the policy:

- To provide protection for the children and young people who give time to Oxfam.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing or be at risk of harm.
- This policy applies to all staff, including senior managers, paid staff, volunteers or anyone working on behalf of Oxfam Retail.
- It is not the responsibility of an employee or volunteer of Oxfam Retail to decide whether or not child abuse is occurring, but it is our responsibility to act on any concerns, in order that Oxfam can protect Children and Young People.
- We will seek to safeguard children and young people by:
 - a) Valuing them, listening to and respecting them
 - b) Adopting child safeguarding guidelines through procedures and a code of conduct for staff and volunteers

- c) Recruiting staff and volunteers safely, ensuring all necessary checks are made
- d) Sharing information about child safeguarding and good practice with children, parents, staff and volunteers
- e) Sharing information about concerns with agencies who need to know, and involving parents and children appropriately
- f) Providing effective management, for staff and volunteers through support and training.

2. Definitions: Child Abuse

The term “child abuse” is used to describe various ways that a child can be harmed or mistreated. Abuse can happen anywhere and at any time, but research indicates that the perpetrators of abuse are likely to be known and trusted by the child.

Child abuse is generally split into four categories - physical, neglect, sexual and emotional:

- **Physical abuse**

This may involve but not limited to hitting, kicking, shaking, throwing, squeezing, suffocating, drowning, burning or biting the child. Giving the child alcohol, drugs or poison are also forms of physical abuse. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child.

- **Neglect**

Neglect is the persistent failure to meet a child’s basic physical and psychological needs. This may include the failure to meet a child’s basic needs, like food, shelter, warm clothing or medical attention. Neglect may occur during pregnancy as a result of substance misuse and is also the failure to provide adequate supervision (including leaving children with inappropriate carers).

- **Sexual abuse**

Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve penetrative and non-penetrative acts or non-contact activities such as involving children in looking at, or in the production of pornographic materials, or encouraging children to behave in sexually inappropriate ways. Sexual abuse includes grooming a child in preparation for abuse, for example, via the internet.

- **Emotional abuse**

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe adverse effects on a child’s emotional development. This may involve a lack of love and affection, telling a child they are worthless, serious bullying or being constantly shouted at. Emotional abuse also occurs when the child is valued only insofar as they meet the needs of another person, when the child is overprotected and unable to explore and learn on their own or when they witness the ill-treatment or abuse of another (including domestic violence), or animal cruelty. Other examples are bullying, including cyber bullying, making fun of what the child says or how they communicate.

Possible signs of abuse include:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries or the explanation of the cause of the injury is ill-fitting.
- The child discloses abuse or describes what appears to be an abusive act.

- Someone else (child or adult) expresses concern about the welfare of another child.
- Unexplained change in behaviour, such as withdrawal or sudden outbursts of temper.
- Inappropriate sexual awareness or sexually explicit behaviour.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.
- Difficulty in making friends.
- Eating disorders, depression, self-harm or suicide attempts.

3. Legal Framework:

This policy has been drawn up on the basis of law and guidance that seeks to protect children as follows:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 2018
- Sexual Offences Act 2003
- Children Act 2004
- Children and Social Work Act 2017
- Mandatory Reporting of female genital mutilation (FGM) (Home Office 2016)
- Protection of Freedoms Act 2012
- Relevant government guidance on safeguarding children, particularly Working Together to Safeguard Children, Department for Education 2018
- Children (Scotland) Act 1995
- Young People (Scotland) Act 2014

4. Safeguarding Children Procedures

4.1 What to do if abuse is suspected:

If any staff member or volunteer of Oxfam Retail suspects abuse is taking place, they should immediately inform their Line Manager who with advice from the HR Business Partner or Retail Safeguarding Manager, will decide whether or not to take the matter further. See Reporting and Managing a concern Flowchart. (Appendix 1)

If a child discloses that they have been abused, you must refer this immediately. The referral can be to the Retail Safeguarding Manager, the HRBP or if the child is at immediate risk of harm, to the Police or Children's Services. A written record of the concern must be kept.

4.2 Key Roles

Supervision (of Young Volunteers)

Effective supervision is critical in order to safeguard Young Volunteers in our care.

- Young Volunteers should not be left alone in a property at any time.
- At least **two adults should be present** when a Young Volunteer is volunteering, of which one must be designated as the Young Volunteer's supervisor for the duration of their shift and must be Enhanced DBS checked.
- All Young Volunteers should have a substantive line manager (e.g. Shop Manager). However, we recognise there may be occasions when this person is not present, and the

Young Volunteer is left alone with two adult volunteers (e.g. if the Shop manager works part-time). In such cases one of these adult volunteers must be identified as the designated supervisor for the duration of the Young Volunteer's volunteering day. If in any doubt contact your Line Manager for advice.

- The Retail Director will have overall responsibility for Oxfam Retail on all Safeguarding matters.

The Retail Safeguarding Manager will advise on all safeguarding matters as follows:

- If it is felt that further investigation is required in order to keep the child safe, then the matter must be referred to Children's Social Care. Children's Social Care may be contacted at any time for advice and consultation. The Local Authority Designated Officer (LADO), Local Safeguarding Partnership for England or Social Services Child Care Team for Scotland and Wales must also be notified if the adult of concern is in a position of trust/Regulated activity within Oxfam. These roles include shop staff and lead volunteers with responsibility for supervising children.
- In the event of a referral to Children's Social Care all relevant information must be shared, including copies of correspondence, log of previous concerns and notes of dialogue. The Data Protection Act is not a barrier to information sharing where doing so is necessary to protect children.
- In the event that a Line Manager/HR Business Partner or Retail Safeguarding Manager is not available or contactable and you believe a criminal offence or harm may come to the child, this should not delay action being taken to protect a child. Any member of Oxfam may contact the police or Children's Social Care direct to raise their concerns. Any action taken must be recorded on the Trading Safeguarding Incident Record.
- If you're informed of abuse that is happening outside of the Oxfam environment to a member of staff or volunteer for example domestic abuse, seek advice from the Retail Safeguarding Manager.
- If you are informed by a volunteer that they are subject to child abuse and it is happening outside of Oxfam, seek advice from the Retail Safeguarding Manager or refer this to Children's Services - or if urgent, the police.
- Contact your local Social Services for Children's Social Care Team, which can be found via the internet or telephone directory. If there are any concerns about the immediate safety of a child, then the police must be contacted without delay.

4.3 Allegations against employee/volunteer

- Any suspicion that a child has been abused by a member of staff or a volunteer must be reported to the Line Manager, Retail Safeguarding Manager or HR Business Partner, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- The Line Manager, HR Business Partner or Retail Safeguarding Manager will decide if a referral is made to the LADO and/or Children's Social Care who may involve the police or will refer directly to the police if out-of-hours. This does not prevent any member of staff if they suspect child abuse has taken place or is disclosed to them, contacting Social Services and making a referral, however the HR Business Partner and/or Retail Safeguarding Manager must be notified of the referral ASAP or within 24 hrs.
- The HR Business Partner or Retail Safeguarding Manager will liaise with the Local Authority Designated Officer (LADO) or relevant Child Care Team whose responsibility it is to:

- Provide advice and guidance
- Liaise with the police and other agencies
- The parents or carers of the child will be contacted as soon as possible following advice from Children’s Social Care and/or the police.
- If the Line Manager/HR Business Partner or Retail Safeguarding Manager is the subject of the suspicion/allegation, the concern must be made to the Head of Safeguarding who will decide on the course of action, suspension, internal enquiry or refer the allegation to Children’s Social Care.
- Where there is a complaint against a member of staff or volunteer there may be three types of investigation:
 - A criminal investigation (Police)
 - A child protection investigation (Social Services)
 - A safeguarding investigation and risk assessment and/or disciplinary/misconduct investigation (Oxfam)

4.4 Internal Investigation and Suspension

- The Line Manager (with advice from the HR Business Partner and/or Retail Safeguarding Manager) will make an appropriate decision about whether any individual suspected of abuse should be temporarily suspended, pending further police and Children’s Social Care enquiries and/or Internal Enquiry.
- Where an individual is suspended it is advised that other employees /volunteers should have no contact until enquiries have concluded. Full support should be offered to the person under suspension.
- Irrespective of the findings of Children’s Social Care or police enquiries, Oxfam Retail via the appropriate procedures will assess all individual cases to decide if an internal investigation should be carried out and whether a member of staff or volunteer should remain suspended or be reinstated. **The welfare of the child should remain of paramount importance throughout.**
- All members of Oxfam Retail will receive a copy of this policy and/or undergo training as part of their induction to the organisation.

4.5 Digital Safeguarding

For Oxfam shops, it’s important that Shop Managers and Lead Volunteers clearly understand the risks posed to children via online activity and social media.

- being exposed to aggressive and violent content or sexual comments or images
- being befriended by adults (sometimes posing as teenagers) and groomed for sexual abuse or exploitation
- uploading inappropriate content of themselves, like embarrassing or intimate photos or videos of themselves or others
- sharing personal information with strangers – for example, phone numbers, date of birth or location
- cyberbullying
- radicalisation
- exposure to too much targeted advertising and marketing
- data breaches, like having their data sold on to other organisations

- putting a child at risk by using their photo and/or name in pictures of the shop team

To mitigate these risks while children are volunteering in Oxfam shops, the following policy points must be adhered to:

- Adult staff and volunteers must not be in online contact with under 18s or add them as friends on social media platforms
- No under 18s should be left alone to set up and run shops' social media accounts
- If U18s are to be used to help with social media, then there should be a risk assessment in place that covers parental consent, privacy settings, parental guidance locks and a clear safety induction for the young person
- The young person's supervisor should be aware of potential risks.
- Staff should be clear on how to report and seek help if there are any concerns

Oxfam Digital Safeguarding Policy has further information on safeguarding children online.

5. Useful Contacts

Retail Safeguarding Manager

Tel: 07554 332812 Email: kjay1@oxfam.org.uk

Oxfam Safeguarding Team

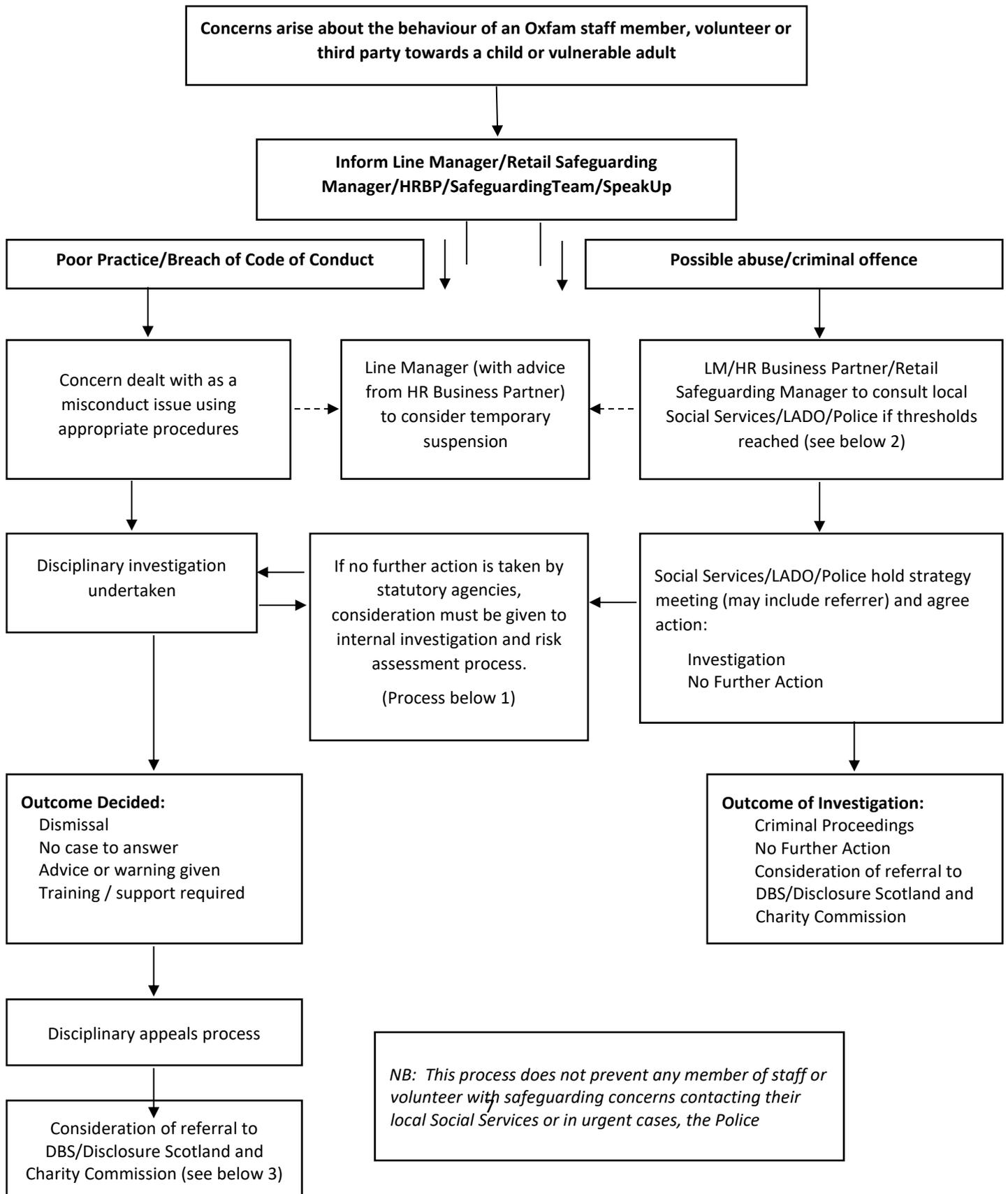
Safeguarding@oxfam.org.uk

Whistle-blowing Speak Up: speakup@oxfam.org.uk

Appendix 1

Retail Safeguarding

Reporting and Managing a Concern: Procedure Flowchart



1. Case Management Procedures, Retail

- All concerns, allegations, disclosures or blemished DBS/PVG disclosure risk assessments are logged onto Clue and given a case number and priority rating. (Clue case management process is detailed elsewhere)
- The investigation/risk assessment process is recorded on the Retail Safeguarding Investigation and Risk Assessment report form
- This form is to be used for safeguarding incidents, allegations or concerns regarding an employee or volunteer working within Oxfam Trading, *where an investigation and risk assessment is commissioned by an HRBP or by the Retail Safeguarding Manager*. It also applies to employees who are alleged to have abused children or adults in their private lives. In these circumstances, careful consideration needs to be given as to whether the employee or volunteer presents a risk to adults or children in their working environment. It should also be used where there has been an allegation of non-recent abuse or in the case of complex or serious conviction information on a disclosure.
- There should normally be two people present for the interview and subsequent risk assessment (referred to here as the interview team). The interview team would normally be the Retail Safeguarding Manager and one other person. This can be an HRBP or member of the Global Safeguarding Team, or other appropriately skilled person, but not the SoC's line manager or their line manager. This leaves the line management structure free for decision making and any appeal.
- The process for communications to the SoC and right to be accompanied should reflect the policies on "Dealing with Problems at Work" ([link](#)) and "Resolving Differences" ([link](#)). Please also refer to policies on Survivors ([link](#)) Safeguarding Children ([link](#)) and Safeguarding Adults ([link](#))

The process is in three parts:

1. Investigation/fact finding. All relevant information leading to the meeting should be listed on the form and recorded on Clue. Interview questions should be drafted and agreed in advance by the interview team.
2. Risk assessment. This will take place after the interview and when the investigation findings have been written up. The interview team should discuss the findings with reference to the risk indicators and guidance in Appendix 1 of the report template and agree a level of risk – current and future – along with any control measures to be put in place, if appropriate.
3. Recommendations. The interview team should forward the report and recommendations to the decision maker/s for the case. The decision maker for the case should be identified at the outset and would normally be the Area Manager for any shop employee or volunteer.

2. Threshold for referral to LADO

A staff member / volunteer has a concern about the behaviour of a member of staff / volunteer towards a child OR A child has made a disclosure of inappropriate behaviour made towards them by a member of staff or volunteer. This includes if a staff member or volunteer has:

- Behaved in a manner that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates that s/he is unsuitable to work with children

The allegation can be:

- In connection with employment, voluntary activity or work placement
- Regarding the individual's own children
- Related to the community or private life of a partner, family member or other member of their household

Following an allegation, the LADO, in consultation with the Oxfam staff member, will determine the action required. There are three potential courses of action

- A police investigation
- Enquiries and assessment by social care
- Consideration by an employer

Multi-agency Allegation Management Meetings are also convened by the Designated Officer to manage specific situations.

NB: Most LADOs will only take referrals about adults working in positions of trust (Regulated Activity). In Oxfam shops these people are Shop Managers, Deputy Shop Managers and some Lead Volunteers. If the concern is about an adult NOT in Regulated Activity, then the referral should be to Children's Social Care and/or the police

3. Thresholds for referral to DBS/Disclosure Scotland

If an employee or volunteer has been permanently removed from work for harmful behaviour towards a child, Oxfam has to send an employer referral form to DBS or Disclosure Scotland.

If a staff member or volunteer resigns during a safeguarding process, then a referral should also be made.