

Safeguarding policy

1. Overview

This policy has been prepared and approved to provide a framework for safeguarding and promoting the welfare of young people and vulnerable colleagues at Boots. The policy gives further information to support the policy statements, provides guidance on defining, identifying and reporting possible abuse, and has been developed with reference to the Safeguarding Children Board as well as procedures, Acts and guidance issued by relevant bodies and groups, such as:

- Working together to safeguard children 2018
- Children Act 1989 (amendment 2019)
- Safeguarding Vulnerable Groups Act 2006 (schedule 4 amended 2012)
- Keeping Children Safe in Education Sept 2021
- Children Missing Education (CME) 2016
- Equality Act 2010 (updated 2015)
- Ofsted Safeguarding Policy (updated 2021)
- Prevent Duty Guidance 2015

Related Boots policies and procedures which all staff must be aware of, and are accessible on the intranet or 'BootsLive' page are:

- Dignity at Work policy
- Safeguarding and Prevent policy statements
- Mental health Policy
- Health and Safety Policy
- Diversity and Inclusion Statement
- Colleague Privacy Policy
- Codes of Conduct
- Whistleblowing policy
- Grievance procedure
- Computer Security Policy

Caring for colleagues and keeping them safe is at the heart of our vision and it's an important and legal duty that we do the right thing to help those colleagues who may be at risk of harm, by reporting allegations and incidents of abuse when children and vulnerable adults are involved. The Designated Safeguarding Leads have a legal and moral duty to refer allegations and incidents of abuse to external agencies when appropriate. A child (or young person) is legally defined as *any person who is under the age of 18 years*.

The broad definition of a 'vulnerable adult', is a colleague over the age of 18 that may be vulnerable, permanently or temporarily, due to having a mental illness, physical or learning disability, being dependent on drugs or alcohol or being at risk of exploitation or radicalisation.

2. Definitions of abuse

Safeguarding incidents may be distinct from complaints from a colleague. To constitute a safeguarding incident there must be an allegation or suspected or actual evidence of abuse.

There are different types of abuse:

Physical abuse

This may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

Neglect

Neglect is the persistent or severe failure to meet their basic physical and/or psychological needs. It will result in serious impairment of their health or development.

Sexual abuse or exploitation

Sexual abuse involves them being forced or coerced into participating in or watching sexual activity. Their apparent consent is irrelevant.

Emotional abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on their behaviour and emotional development, resulting in low self-worth.

Radicalisation

This has been defined as 'the process through which an individual changes from passivity or activism, to become more revolutionary, militant or extremist, especially where there is intent towards, or support for violence'. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination
- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies or faiths

Financial abuse

This usually relates to theft or misuse of a young or vulnerable person's money.

Specific Safeguarding Issues

There are other specific issues that have become critical issues in Safeguarding, and below are some current key concerns.

- Child sex exploitation
- Domestic violence
- Drugs

- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Honour-based Violence
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking
- Psychoactive Substances

This gives details of what is meant by psychoactive substance, which is:

- a) Is capable of producing a psychoactive effect in a person who consumes it and
- b) Is not an exempted substance.

Further details/guidance can be found via

<http://www.legislation.gov.uk/ukpga/2016/2/contents/enacted>

Children Missing Education (CME) 2016

This duty is in relation to the Education Act 2002, and whilst it relates to children of compulsory school age, Boots recognise the implications of young people on an apprenticeship, missing or having poor attendance of training/work. Boots take responsibility to intervene where necessary, to help them achieve good attendance and promote re-engagement with their learning.

3. General policy statement and commitment for Safeguarding

We are committed to ensuring we provide a safe work environment and that we identify young or vulnerable colleagues who are at risk of or experiencing significant harm at work or at home. The first point of contact if you have a safeguarding concern about a colleague is PeoplePoint, via either of the following contact methods;

- Submit a 'contact request form' via the PeoplePoint page on Boots Live and select 'Safeguarding' as the reason for the query. This can be accessed via this link: <https://nsp.bootslive.co.uk/sites/bootslive/AllUKNonOpticiansUsers/Pages/PeoplePoint-%E2%80%93-Overview.aspx>
- Email peoplepoint@boots.co.uk, include 'Safeguarding' in the subject line and 'mark' the email as High Importance

Escalation where needed/appropriate would be to the HR Business Partner (HRBP) for your region or function (Functional Safeguarding Partner).

Our Designated Safeguarding Leads will review our Safeguarding policy and procedures at least annually so that they continue to be effective in raising awareness of safeguarding issues, helping with the identification of colleagues at risk and setting out clear processes to deal with concerns.

There are six Designated Safeguarding Leads at Boots, these are:

Trish Frettsome – *Quality and Funding Manager Apprenticeships*

Angela Corry – *Senior HRBP Finance*

Kirsty Pitcher – *Director of Workplace Experience*

Ruth Jamieson – *Head of HR - Retail*

Alison Ramage – *Head of HR - Pharmacy*

Louise Anderton – *Head of HR - Boots Opticians (Helen Brown from May 2021 to cover maternity)*

PeoplePoint Advisors, HRBP's and the Designated Safeguarding Lead will complete appropriate training to equip them to make decisions on when to refer a safeguarding matter internally or to the appropriate external agency and how to do this correctly. They also participate in training updates and share general safeguarding knowledge as a group and with all colleagues at Boots, to raise and maintain awareness.

A table showing which colleagues should undertake specific safeguarding and refresher training can be found at appendix A2.

The Designated Safeguarding Leads will meet at least twice yearly, to discuss and check, how well safeguarding duties are being discharged. They will also review current reported concerns along with actions taken/needed

4. Responsibilities of the PeoplePoint Advisors

They are responsible for:

- Completion of all relevant internal training to ensure they maintain knowledge of process and procedures
- Giving appropriate advice and guidance to colleagues calling with concerns to ensure appropriate safeguards are put in place for apprentices and/or colleagues
- Seek clarification and or guidance from relevant Functional Safeguarding Partners (HRBP's) as and when needed or appropriate
- Completion of detailed notes in 'Salesforce' system, appropriately tagged for any child protection or Safeguarding complaint or concern (even where that concern does not lead to a referral) to aid reporting
- Refer any concern rated as 'High' to the appropriate Functional Safeguarding Partner (HRBP)

5. Responsibilities of the HRBP's (Functional Safeguarding Partner)

- Completion of all relevant training to ensure they maintain knowledge of process and procedures (refresher training to be completed every 2 years)
- Seek clarification and/or guidance from Designated Safeguarding Leads as and when needed or appropriate
- Support the Designated Safeguarding Leads in providing advice and support to other staff on issues relating to child protection, and Safeguarding including the Prevent duty
- Liaising with appropriate managers to ensure appropriate safeguards are put in place for apprentices or students on work placements
- Ensuring young people and vulnerable colleagues are aware of our Safeguarding policy

- Follow up any 'high' referred safeguarding concerns from PeoplePoint (even where that concern does not lead to an external referral) and record follow up actions in 'Salesforce' system
- Dealing with any external referrals as appropriate, ensuring that the appropriate Designated Safeguarding Lead is informed

6. Responsibilities of the Designated Safeguarding Leads

They are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the Social Services access team and the Child Protection Officer of the local police, and the local Prevent Co-ordinator, as appropriate.
- Providing advice and support to other staff on issues relating to child or vulnerable adult protection, and Safeguarding including the Prevent duty.
- Ensure appropriate full records are maintained and stored appropriately, for any child protection or Safeguarding concern (even where that concern does not lead to an external referral)
- Liaising with the local Safeguarding Children Boards and other appropriate agencies
- Review policy and arrangements annually for effectiveness and consistency with the Safeguarding Children Board's requirements or guidance
- Ensuring that relevant colleagues are receiving basic training in safeguarding issues and are aware of Boots' Safeguarding and Prevent procedures (refresher training to be completed every 2 years)
- Reporting how they have discharged their duties regularly (at least twice yearly) to the Senior Leadership team through their Safeguarding meetings minutes.
- Report any deficiencies in policy, procedures or training provision to the Senior Leadership team without delay.

7. Responsibility of all Boots' colleagues.

All colleagues are responsible for reporting allegations, suspicion and actual cases of abuse involving young or vulnerable colleagues.

- Report concerns or incidents of suspected abuse or radicalisation to PeoplePoint or the HRBP (Functional Safeguarding Partner) as soon as possible.
- Apprentices and other young or vulnerable colleagues should be made aware of the Safeguarding and Prevent policy and their line managers should check that they know how to report potential or actual safeguarding incidents involving themselves or others.
- Safeguarding and Prevent awareness will be reinforced with apprentices throughout their learning programme.

8. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

If a young person, vulnerable adult or any colleague tells you about possible abuse or radicalisation:

- **Inform the individual that you must pass the information on to the HRBP via People Point and they may also need to refer the allegation or incident onto a Designated Safeguarding Lead and a third party if required. However, this will be the limit of disclosure.**
- **If they then decline to discuss the incident you must still inform the HRBP via People Point.**

NOTE: If the person is not under 18 or a vulnerable adult by definition, the designated person has no obligation legally to refer the incident onto a third party but should give guidance to the colleague concerned on what action is recommended.

- Listen carefully and stay calm.
- Do not interview them, but question normally and without pressure, in order to be sure that you understand what they are telling you.
- Do not put words into their mouth, influence or misinterpret the information
- Reassure them that by telling you, they have done the right thing.
- To aid information to be captured refer to the SCF form (appendix A1)
- Make a detailed note of the date, time, place, what the young person or vulnerable adult said, did and your questions etc.
- Staff should not investigate concerns or allegations themselves but should report them immediately or as soon as practically possible to PeoplePoint or the Function HRBP.
- Reconfirm that the incident will be referred to appropriate personnel
- The record of the discussion must be relayed to PeoplePoint as soon as possible

HRBP (Functional Safeguarding Partner) and Designated Safeguarding Lead procedures.

Where a referred 'High' concern from PeoplePoint to a designated person (HRBP) has been received they will investigate the allegation/concern. If it is an HRBP that is directly involved in the disclosure, then a Designated Safeguarding Lead will conduct the investigation.

Depending on the nature or seriousness of the allegation, the designated person may carry out the following procedure:

- Contact the colleague concerned and arrange, where possible, a face to face meeting with them to determine a course of action.
- Where allegations are made against another Boots colleague an investigation possibly involving them will occur. At this point the line manager or a senior leader will be informed of the allegation and be involved in the process. The colleague may be suspended or prevented from having contact with the person concerned and others until the investigation has been carried out. Where abuse has been proven, the company's disciplinary procedure will be applied.
- The young or vulnerable colleague will be informed of the outcome of the investigation by the designated person.
- At any point through the investigation, the designated person may contact a Designated Safeguarding Lead for support or advice

- In some cases, it may be appropriate to refer the case/individual to LifeWorks Support Service or Colleague Health etc
- In some cases, the designated person will contact external support agencies immediately to report the incident or obtain advice. Such cases may include situations where the individual is deemed to be in danger of being re-abused or abuse has been observed by a colleague, or where potential extremist behaviour has been observed or reported to Boots. In this instance the use of the 'Channel' scheme could also be considered.
- The colleague will be informed of the actions taken by the designated person.
- In all cases of safeguarding incidents, a clear record of the investigations and outcomes will be maintained in the 'Salesforce' system by the designated people responsible which is stored securely

9. Safer Recruitment within the Early Careers provision at Boots

- In line with safer recruitment requirements, an enhanced DBS check (Disclosure and Barring Service) will be requested and carried out on all appropriate staff that are involved in the Early Careers provision at Boots, prior to commencement of employment with Boots or before taking up their new position.
- Colleagues will be invited to disclose any incidents of current outstanding convictions within the interview process. Any false information provided by the applicant may lead to the position being withdrawn.
- Where unspent convictions relating to safeguarding and child abuse are identified within the DBS, under current legislation Boots will be unable to approve an appointment under the vetting and barring scheme and the job offer will be withdrawn.
- Further guidance should be sought in the Boots Recruitment Policy.

Further guidance

Disclosure and Barring Service (DBS)

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

'Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children.'

Designated Safeguarding Leads

- Trish Frettsome – Tel: 07384 237208
Email – trish.frettsome@boots.co.uk
- Angela Corry – Tel: 07725 427367
Email – angela.01.corry@boots.co.uk
- Kirsty Pitcher – Tel: 07823 524671
Email – Kirsty.pitcher@boots.co.uk
- Ruth Jamieson – Tel: 07734 056356
Email – ruth.jamieson@boots.co.uk
- Alison Ramage – Tel: 07734 056314
Email – alison.ramage@boots.co.uk
- Louise Anderton – Tel: 07384 908770
Email - Louise.Anderton@boots.co.uk
- Helen Brown – (*May 2021 to cover maternity for Louise Anderton*) – Tel: 07557 179950
Email - Helen.Brown1@boots.co.uk

Other referral and support agencies contact details:

- **Boots LifeWorks** –
Accessible via Boots intranet or www.lifeworks.com
Tel: 0800 077 8316
- **Boots Benevolent Fund** – Financial Hardship Fund
Accessible through LifeWorks
- **Children's Social Care** - 0300 500 80 80
Emergency Duty Team for out of office hours – 0300 456 45 46
- **Nottinghamshire Police** – 101 – in Emergency 999
- **Nottinghamshire Safeguarding Children Board (NSCB)**
County Hall
West Bridgford
Nottingham
NG2 7QP
Tel: 01159 773935
- **Local Authority Designated Officer (LADO):**
Tel: 01159 9773921

- Nottingham Vulnerable adults**
 Aspect House
 Aspect Business Park Floor 2
 Bennerley Road
 Bulwell
 Nottingham
 NG6 8WR
Tel: 0300 131 0300
Email: adult.contactteam@nottinghamcity.gov.uk
- Nottingham Safeguarding Adult Board (NCSAB)**
 Loxley House
 Station Street
 Nottingham
 NG2 3NG
Tel: 01159 8764762
Email: safeguarding.partnership@nottinghamcity.gov.uk
- PREVENT:**
 Sam Slack
 East Midlands Regional Prevent Coordinator HE/FE
Tel: 07384 452156
Email: sam.slack@education.gov.uk
- Dept of Education**
Tel: 020 73407264
Email: Counter.extremism@education.gsi.gov.uk
- ChildLine** – 0800 1111 (available 24 hours, 7 days per week)
- Young Minds** - Resource and advice for emotional wellbeing <https://youngminds.org.uk/>
- NHS – Better Health/Every Mind Matter** - <https://www.nhs.uk/every-mind-matters/>
- Qwell** – Online counselling and wellbeing for adults and carers <https://www.qwell.io/>
- Papyrus** – Charity for the prevention of young suicide <https://papyrus-uk.org/>
- NSPCC** – 0808 800 5000 (available 24 hours, 7 days per week)

Author/Reviewer	Apprenticeship Quality and Funding Manager (Designated Safeguarding Lead)
Date of last revision	Oct 2021
Authorising Body	Designated Safeguarding Lead Team
Date of next review	Oct 2022

A1 - Safeguarding Concern Form (SCF)

Please refer to, as guidance for information to be obtained/recorded, following reporting procedures in the policy

- Is the concern regarding a 16-17 year old Colleague Yes/No

- Is the concern regarding an adult Colleague (aged 18+) Yes/No

To be completed by the member of staff to whom a disclosure has been made, or the member of staff who has concerns about a Colleague

1. Colleague details:

Name of colleague:	Is the individual an apprentice: Yes/No
Gender:	Date of Birth:
Ethnicity:	Nationality:
Address of colleague:	Current location of colleague:
Colleague contact Tel no:	Next of Kin:
Tutor/Assessor Name if an apprentice:	Line Manager Name:

2. Disclosure details

Name of staff completing the form:	Name of Safeguarding Partner (HRBP) involved:	Name of Designated Safeguarding Lead involved:
Date of disclosure:	Time of disclosure:	Place of disclosure:

Please describe the nature of the incident/concern, including relevant background in as much detail as possible. (Please try to record the individual's words as accurately as possible, be factual)

3. Safeguarding Partner/Lead Investigation Report including log of ongoing actions with timeframes, and details of any external referrals:

Name of Safeguarding Partner/Lead conducting investigation:	Investigation Start date:	Safeguarding Category i.e. Safeguarding, Prevent (for reporting purposes):

Any siblings employed with Boots? Yes No <i>If yes, please give name and Business Area:</i>	Any younger siblings/Children at risk? Yes No <i>If yes, please give name and age:</i> <i>(Use only if making a referral to the Social Care Team)</i>

4. Investigation Conclusion including details of any external referrals:

[Empty box for recording investigation conclusion and external referrals]

Form for guidance only – detail should be recorded in ‘Salesforce’ System and updated as appropriate

A2 - Mandatory Safeguarding Training

Mandatory Training Events	Training for ALL Staff	Training for ALL Staff involved in Apprenticeship Delivery	Training for All Line Managers of Apprentices	Designated Safeguarding Leads only
Safeguarding & Prevent Policy (during induction) in house	√	√	√	√
E-Safety Policy (during induction) internal	√	√	√	√
E-Learning Safeguard and Prevent Awareness (internal)	√	√	√	√
Keeping Children Safe in Education (Part One) self-study guide (during induction) in house		√		√
ETF (Prevent on-line) - For Practitioners https://www.foundationonline.org.uk/		√		
ETF (Prevent on-line) – for Leaders and Managers https://www.foundationonline.org.uk/			√ <i>Mgrs only</i>	√
ETF (Prevent on-line) – for Employers https://www.foundationonline.org.uk/			√	√
ETF (Safeguarding on-line) – (within Teaching and Learning link) https://www.foundationonline.org.uk/		√		
ETF (Safeguarding and Safer recruitment on-line) – (within Teaching and Learning link) https://www.foundationonline.org.uk/			√	√

<p>Chanel Awareness (Prevent on-line) http://course.ncalt.com/Channel_General_Awareness/01/index.html</p>		√		√
<p>Designated Safeguarding Lead Training - (half day County Council training) or equivalent http://www.nottinghamshire.gov.uk/education/information-for-schools/safeguarding-in-schools-training</p>				√
<p>Designated Safeguarding Lead Training Refresher - half day <i>(Needed every two years)</i> http://www.nottinghamshire.gov.uk/education/information-for-schools/safeguarding-in-schools-training</p>				√