



Safeguarding and Prevent Policy

This policy has been prepared and approved to provide a framework for safeguarding and promoting the welfare of young people and vulnerable team members at Boots.

The Safeguarding and Prevent policy applies to Boots UK, Boots Opticians, UK No7 Beauty Company and all other team members on BMSL contracts.

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 and Adult Boards as well as procedures, Acts and guidance issued by relevant bodies and groups.

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

- Safeguarding and Prevent Policy statements
- Dignity at Work Policy
- Mental Health Policy
- Health and Safety Policy
- Colleague Privacy Policy
- Codes of Conduct and Ethics
- Grievance and Whistleblowing Policy
- Computer Security Policy

Caring for team members 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 team members 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 team member 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 team member. To constitute a safeguarding incident there must be an allegation or suspected or actual evidence of abuse (which can be to themselves or others).

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 [here](#)

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 work experience or 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 team members 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 team member is PeoplePoint (ER team), by completing the form via the link or QR code accessible on the main policy on the intranet or Store/HUB posters.

All safeguarding concerns received are flagged and an SLA for response to submitted forms is 2 hours from 'opening' for medium and high-risk concerns and 24 hours for low risk. Escalation for medium and high-risk concerns would be to the Employee Relation Partners (ERP) and where appropriate the ERP would link in with the relevant HR Business Partner (HRBP)/ (Functional Safeguarding Partner) and Designated Safeguarding Lead (DSL) for all high risk.

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

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

*Quality and Funding Manager Talent, Employability and Future Skills
Head of HR – Shared Enabling Functions*

Head of HR – Stores and Central Ops

Head of HR Healthcare

Head of HR Boots Opticians

PeoplePoint Advisors, ERP's, 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 an 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 team members at Boots as and when appropriate, to raise and maintain awareness.

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 Employee Relations Advisors (ERA's), Employee Relations Partners (ERP's) and Employee Relations Manager (ERM)

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 team members contacting with concerns to ensure appropriate safeguards are put in place for team members of concern
- 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
- Seek clarification and or guidance from relevant Employee Relations Partners (ERP'S) as and when needed or appropriate
- Refer any concern rated as 'Med' or 'High' to the Employee Relations Partner (ERP)
- ERP's to link in with HRBP's (Functional Safeguarding Partner) for any 'Med' risk concerns as and when deemed appropriate, and HRBP's and DSL's for ALL 'High' risk concerns.
- ERM consolidate a monthly report of all safeguarding concerns raised and send to the *Quality and Funding Manager Talent, Employability and Future Skills (DSL)*.

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 2-3 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 team members 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 team members, apprentices or students on work placements
- Ensuring ALL team members are aware of our Safeguarding and Prevent policy

- Follow up any 'Med' or 'high' referred safeguarding concerns from ERP's (even where that concern does not lead to an external referral) and where appropriate, liaise with ERP's to ensure appropriate follow up actions are recorded 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 any external agencies including but not limited to - Social Services access team, Child Protection Officer of the local police, local police, safeguarding boards and the local Prevent Co-ordinator, as appropriate.
- Providing advice and support to other team members 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)
- Review policy and arrangements annually for effectiveness and consistency with the Safeguarding Children and Adult Board's requirements or guidance
- Ensuring that relevant team members are receiving training in safeguarding issues and are aware of Boots' Safeguarding and Prevent procedures (refresher training to be completed every 2-3 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' team members.

All team members are responsible for reporting allegations, suspicion and actual cases of any type of abuse involving any team members including young or vulnerable team members.

- Report concerns or incidents of suspected abuse or radicalisation to PeoplePoint as soon as possible.
- All team members 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 team member tells you about possible abuse or radicalisation:

- **Inform the individual that you must pass the information on to PeoplePoint 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 PeoplePoint.**

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 team member 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.
- Make a detailed note of the date, time, place, what the team member said, did and your questions etc.
- Be clear in your note taking and try to write down/relay information exactly as its been told to you by the individual.
- Team members should not investigate concerns or allegations themselves but should report them immediately or as soon as practically possible to PeoplePoint.
- Reconfirm that the incident will be referred to appropriate personnel.
- The record of the discussion must be relayed to PeoplePoint as soon as possible via the previous mentioned reporting form.

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

Where a referred 'Med' or 'High' concern from PeoplePoint to a designated person (HRBP) has been received they will support/investigate/advise on 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 team member 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 team member 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 team member 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 team member 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 team member, 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 team member 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 ER team as needed and which is stored securely.

9. Safer Recruitment within the Talent, Employability and Future Skills 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 Talent, Employability and Future Skills provision at Boots, prior to commencement of employment with Boots or before taking up their new position.
- Team members 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.'

Safeguarding Support Contact Details	
Designated Safeguarding Leads	Contact details
<i>Quality and Funding Manager Talent, Employability and Future Skills</i>	As detailed on the main policy on the intranet or Store/HUB posters
<i>Head of HR – Shared Enabling Functions</i>	As detailed on the main policy on the intranet or Store/HUB posters
<i>Head of HR – Stores and Central Ops</i>	As detailed on the main policy on the intranet or Store/HUB posters
<i>Head of HR Healthcare</i>	As detailed on the main policy on the intranet or Store/HUB posters
<i>Head of HR Boots Opticians</i>	As detailed on the main policy on the intranet or Store/HUB posters

Other Internal referral and support contact details:

The following services are available to all team members -

- **Boots LifeWorks** – Via telephone on: 0800 077 8316 (UK) or 1800 818618 (ROI)
Online at: www.lifeworks.com for login and password details see main policy on the intranet
- **Boots Benevolent Fund** – Financial Hardship Fund
Accessible through LifeWorks or by contacting the Fund Team to request an application
Tel: 0115 9595166, Email: bbf@boots.co.uk

Examples of other external agencies and support lines available dependant on the need identified:

Nature of support required	National support services/helplines	Nottingham based support agencies (equivalent/similar regional ones should/may be available)
Child safety or Safeguarding concern	<p>ChildLine – 0800 1111 (available 24 hours, 7 days per week)</p> <p>NSPCC – 0808 800 5000 (available 24 hours, 7 days per week)</p> <p>Local Council Link to GOV.UK (www.gov.uk)</p>	<p>Nottinghamshire Safeguarding Children Board (NSCB) - https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/worried-about-a-child/ Tel: 0115 876 4800</p> <p>Local Authority Designated Officer (LADO): https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/worried-about-a-child/lado/ Tel: 0115 876 4762</p> <p>Key Regional Contacts information Nottinghamshire https://nottsdistrict.proceduresonline.com/chapters/p_key_reg.html</p>

		Nottinghamshire/local Police – Tel: 101 – in Emergency 999
Domestic Violence/ Abuse	<p>Refuge – National Domestic Violence Helpline Freephone, 24-hour Helpline 0808 2000 247 Website www.refuge.org.uk</p> <p>Respect – Men’s Advice Line – Freephone 0808 8010327 Website www.mensadviceline.org.uk</p> <p>Ask for Ani https://www.gov.uk/guidance/ask-for-ani-domestic-abuse-codeword-information-for-pharmacies</p> <p>Abuse against women and girls https://enough.campaign.gov.uk/?utm_campaign=Enough&utm_medium=Search&utm_source=Google&utm_content=Organisations-PM</p> <p>GOV.UK Forced Marriage Unit https://www.gov.uk/stop-forced-marriage fm@fcdo.gov.uk Tel: 020 7008 0151 From overseas: +44 (0)20 7008 0151 Monday to Friday, 9am to 5pm Out of hours: 020 7008 5000</p> <p>Met Police honour based violence support https://www.met.police.uk/advice/advice-and-information/honour-based-abuse/honour-based-abuse-support-organisations/</p> <p>GOV.UK support with modern slavery and human trafficking https://www.nidirect.gov.uk/articles/help-victims-modern-slavery-and-human-trafficking</p>	<p>Nottingham Vulnerable Adults – https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding-adults/</p> <p>Notts Help Yourself www.nottshelpyourself.org.uk – and/or via Customer Service Centre on 0300 500 80 80</p> <p>Nottinghamshire County Council Customer Service Centre – 0300 500 80 80 (Opening times; Monday – Friday 8.00am – 8.00pm, Saturday 8.00am - 12.00pm)</p> <p>Key Regional Contacts information Nottinghamshire https://nottsdistrict.proceduresonline.com/chapters/p_key_reg.html</p> <p>Nottinghamshire/local Police – Tel: 101 – in Emergency 999</p>

	<p>Scottish Women's Aid Scottish Women's Aid or call 0800 027 1234</p> <p>Welsh Women's Aid Welsh Women's Aid or call 0808 08 10 800</p> <p>LGBT anti-violence charity Galop or call 020 7704 2040</p>	
Radicalisation/ extremist views	<p>GOV.UK Prevent support and guidance - https://www.gov.uk/guidance/get-help-if-youre-worried-about-someone-being-radicalised</p>	<p>Sam Slack East Midlands Regional Prevent Coordinator HE/FE</p> <p>Contact details – See main policy on the intranet</p> <p>Nottinghamshire/local Police – Tel: 101 – in Emergency 999</p>
Mental Health – Children and Young People	<p>Young Minds - Resource and advice for emotional wellbeing – 0808 802 5544 https://youngminds.org.uk/</p> <p>Papyrus – Charity for the prevention of young suicide - 0800 068 41 41 https://www.papyrus-uk.org/</p>	<p>Child and Adolescent Mental Health Services – Nottinghamshire https://www.nottinghamshirehealthcare.nhs.uk/camhs-young-people Tel: 0115 8542 299</p> <p>Nottinghamshire NHS Crisis Helpline https://www.nottinghamshirehealthcare.nhs.uk/help-in-a-crisis Tel: 0808 196 3779</p> <p>AskLion Mental Health Crisis Helpline https://www.asklion.co.uk/kb5/nottingham/directory/service.page?id=7JEtQFBlttM Tel: 0300 300 0065</p>
Mental Health – Adults/All	<p>Mind UK – 0300 123 3393 - https://www.mind.org.uk/information-support/helplines/</p> <p>NHS – Better Health/Every Mind Matter - https://www.nhs.uk/every-mind-matters/</p> <p>Rethink Mental Illness – 0808 801 0525 - https://www.rethink.org/</p> <p>National Suicide Prevention Helpline UK - 0800 689 5652</p>	<p>Nottinghamshire NHS Crisis Helpline https://www.nottinghamshirehealthcare.nhs.uk/help-in-a-crisis Tel: 0808 196 3779</p> <p>AskLion Mental Health Crisis Helpline https://www.asklion.co.uk/kb5/nottingham/directory/service.page?id=7JEtQFBlttM Tel: 0300 300 0065</p> <p>Turning Point Nottinghamshire Mental Health https://www.turning-point.co.uk/services/nottingham-helpline Tel: 0808 196 3779</p>

	<p>Anxiety UK – 03444 775 774 - https://www.anxietyuk.org.uk/</p> <p>No Panic – 0300 772 9844 - https://nopanics.org.uk/</p> <p>OCD Action – 0300 636 5478 - https://ocdaction.org.uk/</p> <p>Qwell – Online counselling and wellbeing for adults and carers https://www.qwell.io/</p> <p>SOS (silence of suicide) – 0300 1020 505</p> <p>Samaritans - 116 123</p> <p>CALM – 0800 58 58 58</p>	<p>Notts Help Yourself www.nottshelpyourself.org.uk – and/or via Customer Service Centre on 0300 500 80 80</p> <p>Nottinghamshire County Council Customer Service Centre – 0300 500 80 80 (Opening times; Monday – Friday 8.00am – 8.00pm, Saturday 8.00am - 12.00pm)</p> <p>Nottingham Vulnerable Adults – https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding-adults/</p> <p>Tel: 0300 1310 300 and select option 2</p> <p>Nottinghamshire Safeguarding Adults Board <i>(Adults at risk of risk category only with registered care and support needs)</i> https://www.nottinghamcity.gov.uk/safeguardingadults</p> <p>Aspect House Aspect Business Park Floor 2 Bennerley Road Bulwell Nottingham NG6 8WR</p> <p>Tel: 0300 131 0300 Email: adult.contactteam@nottinghamcity.gov.uk</p> <p>Key Regional Contacts information Nottinghamshire https://nottsdistrict.proceduresonline.com/chapters/p_key_reg.html</p>
<p>Homelessness</p>	<p>Shelter - Homelessness - Shelter England Freephone 0808 800 4444</p> <p>Home - Shelter Scotland Freephone 0808 800 4444</p> <p>Shelter Wales - Home is everything Freephone 08000 495 495</p>	<p>Nottingham Vulnerable Adults – https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/safeguarding-adults/</p> <p>Tel: 0300 1310 300 and select option 2</p> <p>Notts Help Yourself www.nottshelpyourself.org.uk – and/or via Customer Service Centre on 0300 500 80 80</p> <p>Key Regional Contacts information Nottinghamshire https://nottsdistrict.proceduresonline.com/chapters/p_key_reg.html</p>

<p>Drug/Alcohol Abuse</p>	<p>NHS drug addiction support https://www.nhs.uk/live-well/addiction-support/drug-addiction-getting-help/</p> <p>Talk to FRANK – find support near you https://www.talktofrank.com/get-help/find-support-near-you</p> <p>Drug and Alcohol abuse support https://www.turning-point.co.uk/services/drug-and-alcohol-support.html</p>	<p>Free support for drug and alcohol abuse https://www.nottinghamrecoverynetwork.com/ Tel: 0800 066 5362</p> <p>Nottinghamshire county council drug and alcohol support https://www.nottinghamshire.gov.uk/care/health-and-wellbeing/drugs-and-alcohol-support Tel: 01158 960 798</p>
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