



Policy Documents

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1. Introduction

Rebecca Salter specialises in European Migration through storytelling, consultancy and education, with a focus on Early Childhood. Hereafter the work of Rebecca Salter will be defined in this document as 'the consultancy'.

2. Equal Opportunities policy

The consultancy is committed to equal opportunities for all people engaging with the services provided. Children, adults and family units should be treated fairly, with dignity and respect. This should be true regardless of family background, race, nationality, gender or ability. This applies no matter what individuals think or say, what language they speak or their life circumstances. Equality legislation and guidance will be followed, including but not limited to:

- The United Nations Convention on the Rights of the Child, 1989 (UNCRC).
- Children and Young People (Scotland) Act 2014.
- Equality Act 2010.

The consultancy is committed to ensuring that the services provided protect children from exposure to inappropriate activities, action, language and materials, this includes overt criticism or sarcasm to any child. The consultancy is also committed to avoiding stereotypical attitudes, racist terminology or gender bias.

3. Data Protection policy

Every aspect of the consultancy is guided by the Data Protection Act 2018 (this includes GDPR). Measures are taken to comply with the following guidelines.

The Data Protection Act 2018, including GDPR, requires personal data to be:

- Obtained and processed fairly and lawfully, and with consent.



- Be rectified if inaccurate.
- Only be disclosed in appropriate and necessary circumstances.
- Be accurate, relevant and not held longer than is necessary.
- Data must also be kept securely.

The work of the consultancy, including but not limited to storytelling, consultancy, education, training and community engagement, follows this policy:

- Hard copies of personal data and sensitive information are stored in a secure location, in a locked filing system.
- Personal data and correspondence via e-mail will be kept on password protected email accounts, with two-factor verification. Appropriate safeguarding in emails will also be followed; in some cases where sensitive information is included a child will be mentioned by initials/ a pseudonym. Personal data on the computer is kept on a password protected computer system. Hard drive backups are stored securely.
- Regular reviews will be taken of data stored and anything no longer relevant will be deleted completely/ destroyed by shredding.
- Clients have the rights to refuse the use of their information, even if anonymised, and will be contacted if it is deemed necessary to gain explicit permission share that information, for ethical or data protection reasons.

Under the Data Protection act, disclosure can be made without consent from the person involved (subject) in some circumstances for example if there are safeguarding issues regarding children or if people are at risk. This includes:

- Protecting an individual from neglect or physical, mental or emotional harm.
- Protecting the physical, mental or emotional wellbeing of an individual.
- If the individual is aged under 18, or aged 18 or over and at risk.
- If the processing is necessary for reasons of substantial public interest.

You can request to access, correct or delete any personal information held by the Consultancy at any time by sending an email to rebeccasalterconsultancy@gmail.com.

4. Safeguarding policy and procedure

Rebecca Salter (Self Employed as a Sole Trader) works with children and adults through education, storytelling, training and consultancy services and community engagement. This includes both in person and online contact.

In the work of Rebecca Salter Consultancy, there is a responsibility to:

- protect all children and young people during contact with its business, from any neglectful, physical, sexual and emotional abuse and to immediately report any abuse discovered or suspected,



- The purpose of this policy is to protect children and young people from abuse or risk of harm while in contact with this consultancy, and to ensure that concerns are effectively managed
- This policy applies to everyone working or volunteering on behalf of the consultancy.
- This policy will be updated annually.

Rebecca Salter consultancy recognises that the wellbeing and protection of all children and young people is everyone's responsibility and everyone's job, and there is an individual and collective duty to protect all vulnerable people in the community.

- If a safeguarding issue arises, effective assessments and decisions about a child's wellbeing and safety will be made.
- Relevant information will be shared with the appropriate people or organisations.
- Depending on where the event takes place, for example in Scotland or England, the appropriate local legislation and child protection policies will be followed where necessary.

5. Safeguarding policy and procedure in relation to the Data Protection policy

An individual (child or adult) is considered at risk if the consultancy has reasonable cause to suspect that the individual:

- Has needs for care and support.
- Is experiencing, or at risk of, neglect or physical, mental or emotional harm, and as a result of those needs is unable to protect themselves.

Rebecca Salter is Self Employed as a Sole Trader, and therefore is responsible for any decisions as to whether to disclose personal data. If this is needed the following procedure will be followed. 1. Liaise with the person making the request. 2. If it is safe to do so, liaise with the data subject. 3. Concerns will be recorded on the appropriate paperwork depending on the location of the incident, and stored securely for as long as necessary.

Personal data held on service users will not be disclosed to a third party unless:

- Permission has been granted by an individual
- A legal request has been made by the courts.
- It is believed, according to the professional opinion of the consultancy, that there is risk to a child or vulnerable adult that may lead to harm.

When an individual books a service, they should consult the data protection policy for clarity about how data is used.



6. Disclosure information

Rebecca Salter has PVG scheme membership with Disclosure Scotland for regulated work with children and has been a member since 2013.

Under the protocol for Disclosure Scotland, if a service user requires Rebecca Salter to undergo further Disclosure Scotland checks for any work contracted or employed for, then an 'Existing PVG Scheme Member Application' can be filled in. This can then be sent to the service user to countersign.

If you need any more information on this please do not hesitate to email rebeccasalterconsultancy@gmail.com.

Anticipated organisations that may require scheme records include schools, early years settings and businesses where the consultancy is specifically asked to work with children and protected adults.

For consultancy work including conversation cafes, public storytelling and English lessons, it is not anticipated that a scheme record is needed.

The above information about Disclosures is relevant to a Scottish context. If the consultancy's services are required in a different location, for example England, then the service user's organisation's rules relating to Disclosure protocols will be followed where necessary.

7. Risk Assessment policy

The consultancy will consider where risk assessments are necessary and carry these out in the course of the work it engages in.

In some cases, the consultancy will ask the venues they are asked to provide a service in for a risk assessment. In other cases, the consultancy will conduct their own risk assessments (see Appendix 1).

It is the responsibility of the service user, for example schools and early years settings, to make the consultancy aware of any allergies or other important, relevant information relating to those who will be engaging with services provided. This is important to enable the consultancy to ensure safety and equal opportunities in its various activities.

It is not possible to remove risk altogether in craft activities, but it is essential to reduce any such risk to acceptable levels by careful planning and selection of materials to be used.

All people working in craft activities must be safety conscious at all times and should carry out a basic Risk Assessment on their activity before the event (see Appendix 1).



Regular checks will be carried out on materials being used. If the consultancy is not happy with materials being used they must be withdrawn from use immediately.

For activities provided by the consultancy, the following guidelines should be followed:

- Ensure that **all** adhesives, paints, varnishes, etc. are suitable for use with children i.e. are **non-toxic** and **non-allergenic**.
- Check all **materials**, especially re-cycled junk materials, thoroughly for cleanliness, staples etc.
- Be aware that some children are **allergic** to unexpected substances like sandpaper and some even react to substances, which are generally considered to be safe.
- Be especially careful with the use of **“sharps”** e.g. scissors, craft knives and ensure these are all accounted for at the end of a session.

8. Safe Child policy relating to storytelling and other events

The consultancy will take all reasonable steps to ensure the safety of children involved in its organised events.

a. Activities

- Each activity and event will have a maximum number of children
- Age guidelines will be defined for all activities
- Craft and other activities will seek to adhere to safety measures.
- The consultancy has a commitment to the equality of opportunity for all children, including those with disabilities, to actively participate within its events.

b. Adult Supervision

The consultancy works with groups, however, it does not work one on one, in person, with children.

Those working for or on behalf of the consultancy must not be under the influence of alcohol or drugs while working with children, and must have adequate child protection training.

Accidents that occur during a service provided by the consultancy should be recorded following the service provider's protocol and the consultancy's Accident Report form (see Appendix 2).

Children under 8 years must not be left unattended

Children attending events should be collected by an agreed adult. Children should not leave events unattended.

c. Behaviour management of children

Behaviour that spoils the storytelling, education or other service provided by the consultancy, for other children, will be dealt with appropriately according to the setting.

d. In case of disclosure of sensitive information

If a person reports any incident of unacceptable behavior towards any child, or if a child discloses information which suggests they or someone else are at risk, the consultancy is committed to taking immediate and appropriate action, to ensure the safety of children within the event. Please see the **Safeguarding Policy and Procedure** on page 2 for more information.

9. Online classes and conversation clubs policy

1. Most online engagement for English lessons, classes and conversation clubs will be done through Zoom.
2. The consultancy will ensure appropriate training is accessed in relation to online lessons.
3. If children are joining these meetings, parents or other carers must be present at the beginning. In the case of children over 16, a parent or carer's written permission is acceptable in lieu of physical presence at the start.
4. The consultancy reserves the right to remove people from the classes if there is a safety risk. It also reserves the right to control settings such as muting participants where necessary.
5. Everyone must join with the camera on so that it is clear who is participating in the zoom meeting.
6. Any recording of a zoom meeting must only happen with the express permission of everyone (including children) taking part, and gatekeepers as well in the case of children.

10. Online articles and blog posts policy

1. Rebecca Salter Consultancy will endeavour to ensure that online posts are accurate at the time of writing. Ideas and content will be referenced/acknowledged where possible.
2. If anyone has a complaint to raise about online posts, please contact rebeccasalterconsultancy@gmail.com and this will be reviewed as soon as possible.

References:

<http://www.legislation.gov.uk/ukpga/2018/12/section/3/enacted>.

<https://www.gov.uk/data-protection>

<https://www.sfs.org.uk/content/safe-child-policy-document>

Updated 12th June 2020 by Rebecca Salter. To be reviewed annually.