Darjeeling Children's Trust Safeguarding Policy

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Darjeeling Children's Trust (DCT) works to advance the education, health & well-being of children and young people in Darjeeling and wider North Bengal through the

provision and improvement of education and health facilities, through improvements to their living conditions, through sponsorship and through such other charitable activities as may conduce to their general good and personal development.

As a charity committed to improving lives through better educational, health & well-being opportunities, we know that ensuring the safety of the children and young people we work with is integral to the effective operation of our organisation. The protection of children and young people requires everyone to take responsibility and be accountable. Keeping all children and young people safe from all types of harm, while upholding their rights is therefore at the core of all our operations.

The Structure of this Safeguarding Policy (as described in Section 1) is to create a framework for achieving our Core Safeguarding Principles, identifying to whom the Policy applies, and outlining the Implementation procedures we will use to achieve these objectives.

Our Core Safeguarding Principles (as described below and in Section 2) show respect for the fundamental rights of the child as stated in the United Nations Convention on the Rights of the Child (UNCRC) 1989, UK child protection laws, and reflect the unique characteristics of DCT and its work with children.

As described in Section 3 on the Scope of the Policy, our Safeguarding Policy applies to trustees, agents, volunteers and donors of DCT (DCT Team).

The UN Convention on the Rights of the Child (1989), Article 19 states: “parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.”

Having defined the Structure of our Safeguarding Policy, the Core Safeguarding Principles, and the individuals to whom this Policy applies, our final section identifies the key Implementation systems needed to execute the Policy. This includes the need for specific Risk Assessments, relevant Codes of Conduct, Reporting Steps and other systems and procedures that are needed to achieve our Safeguarding Objectives.

Finally, it is a guiding principle that DCT delivers sustainable development, which means providing ongoing support for Projects and Programmes and continuing engagement. It is the role of DCT to use its best endeavours to ensure that all individuals and organisations supported by funds made available by DCT or engaged by DCT observe and abide by local policies and regulations, and national and international laws in relation to the protection of children.

Section 1 - Structure of the Policy

The Structure of this Safeguarding Policy is to outline the key aspects that DCT uses to achieve its Safeguarding Objectives.

• DCT seeks to provide appropriate Safeguarding protection for anyone involved with DCT in connection with the delivery of its Projects and Programmes.

• To achieve this, the Policy outlines the Core Safeguarding Principles (Section 2) that DCT believes should guide our safeguarding activities.

• The Policy also sets out the Scope and application of our safeguarding activities (Section 3) so that all parties are clear as to their obligations with respect to Safeguarding.

• We will implement the Policy through detailed Implementation Procedures (Section 4) including Risk Assessments, Codes of Conduct and other procedures that will help ensure that our Safeguarding Objectives are achieved.

Section 2 - Our Core Safeguarding Principles

This Safeguarding Policy seeks to define the duty of care that is owed to any child or young person to protect them from harm. We believe that:

• The best interests of the individual child or young person is paramount and will be the primary consideration in DCT Safeguarding Policy and Implementation.

• All children and young people should have equality of opportunity and the chance to enjoy activities safely regardless of their gender, ability, race, ethnicity, circumstances or age, and vulnerable children require a particularly high duty of care.

• Children and young people have rights, including the right to protection and the right to be consulted and participate in decisions affecting their lives, and are therefore provided a role in the implementation and revision of this Policy.

More generally, and non-exhaustively:

• DCT will work in an honest and transparent way by informing those we work with about our Safeguarding Policy, and how we work to safeguard children and young people.

• DCT will ensure confidentiality to protect sensitive personal data. Information will only be shared and handled on a need to know basis - access to information must be necessary solely for the conduct of official duties.

• DCT will, where appropriate, work with others to protect children and young people including other nongovernmental organisations (NGOs), school and community leaders, law enforcement and specialist child welfare agencies.

• DCT will, through its senior Management, supervised by its Trustees, review the policies and implementation of the Safeguarding Policy on a regular basis.

Once approved, the Policy itself will be reviewed by the Trustees once each calendar year and through a regular agenda item at quarterly board meetings. Any significant issues or allegations with respect to Safeguarding shall be notified to the Board according to our response management procedures.

The following key action steps will be used to ensure these core principles can be embedded practically and effectively within the operating frameworks of DCT:

• Educating – DCT believes that the best method of achieving its Safeguarding objectives is to educate and train all individuals and groups to whom this policy applies.

• Monitoring – DCT believes that only by careful, systemised monitoring of the procedures outlined by this policy will its Safeguarding objectives be properly achieved.

• Responding – DCT believes that it is critical that effective, formal systems for responding to suspicions or allegations of breaches of this policy are effectively implemented and managed.

Section 3 - Scope of the Policy

This policy applies to the DCT Team and DCT Visitors as defined below.

This policy makes clear that Safeguarding is the responsibility of the entire DCT team and visitors who have contact with children and young people. This policy sets out the minimum standards expected, and all stated parties are bound to act according to the requirements it sets out.

This policy is integral to the operations of DCT and should be assumed to underpin all other policies and activities of the organisation.

Definitions:

DCT team – All trustees and agents of DCT. It is worth noting that although Safeguarding applies everywhere, it is likely that any problems are most likely to arise in India where DCT's activities most directly engage with children and more vulnerable individuals. Our policies and procedures are therefore more focused on Risk Assessments relating to visits by DCT Team members to India.

DCT Visitors – All volunteers, donors and other DCT on-site visitors present at a DCT project site. As above, policies and procedures are focused on Risk Assessments relating to contact by DCT Visitors with beneficiaries at project sites.

Section 4 - Implementation

a) Risk Assessment

Beyond the general application of the Principles and Scope of Safeguarding Policy, DCT believes that Safeguarding is most effective when it is targeted at the areas and situations where there is the highest risk. This is done by formal Risk Assessments which may be broad in focus. It is vitally important that these risk areas, general and specific, be under review on a defined timely basis. A template Risk Assessment is at Appendix 1.

b) Codes of Conduct

The second overarching procedure of our Safeguarding Policy is the use of a detailed Code of Conduct to give clear indications as to appropriate behaviour. The existence and details of a specific Code of Conduct will be guided by our formal Risk Assessments. Codes of Conduct are critical in distilling the most important aspects of DCT Safeguarding Policy, giving instructions relevant to the individual's involvement, and practical examples of what is or is not appropriate.

It is important that the Code of Conduct is reviewed on a regular basis, as established by this Safeguarding Policy. The Code of Conduct is at Appendix 2.

c) Key Actions

This is the third major component of this, DCT's Safeguarding Policy. The three identified key actions are: educating, monitoring and responding.

i. Educating

DCT provides compulsory Safeguarding Training (ST) for all members of the DCT Team as part of the Induction process. Safeguarding Training is designed to ensure that all DCT Team members know and accept the broad and detailed elements of this Safeguarding Policy. All members of the DCT team who, through their role, are in contact with children and young people will be expected to complete ST at an appropriate level on an annual basis to ensure that best practice is maintained and updated as needed. Likewise, appropriate Safeguarding Training will be provided to volunteers appropriate to the scale and scope of their involvement with the organisation.

ii. Monitoring & Responding

Monitoring is the process of ensuring that the core principles and key steps of the policy are being adhered to. Monitoring processes are typically reviewed on a quarterly basis. An Incident Reporting Form is at Appendix 3.

Responding is the process whereby concerns about possible breaches of Safeguarding Policy (including potential breaches in educating and monitoring) are raised and addressed in an appropriate and timely manner.

Any suspicion, suggestion or allegation of potential breach of Safeguarding Policy will be evidenced by any member of DCT Team or a DCT Visitor completing an Incident Reporting form and communicating that information to a specific individual within DCT.

DCT will also maintain an Incident Reporting Form Register. This Register is a logbook and file that includes all Incident Reporting Forms, evidence, documentation, deliberations and decisions with respect to that Cause for Concern, whether closed or not.

d) Management, Accountability and Review Ultimate responsibility for Safeguarding lies with the Board of Trustees of DCT. This Policy imposes responsibilities on every member of DCT Team or any DCT Visitor to perform actions within the key steps of Educating, Monitoring and Responding, and each Team member or Visitor is accountable to the Board for his or her actions.

It is the duty of DCT team to implement the DCT Safeguarding Policy and to provide appropriate and timely recommendations to the Board for any revisions to the Policy. At a minimum, a formal, comprehensive recommendation for any revisions to the Policy must be submitted to the Board at least once every Financial Year.

e) Safe Personnel Recruitment

In addition to the Key Actions outlined above, DCT believes that Safeguarding begins with recruiting appropriate individuals to DCT. The Safe Personnel Recruitment Protocol is at Appendix 4. This protocol covers both the DCT Team and Volunteers.

f) Communication Guidelines
DCT extends Safeguarding of children to include proper communications, data collection and retention and the informed consent for images of children (and other individuals). Appendix 5 Communications Guidelines outlines requirements with respect to these issues.

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Appendix 1

Risk Assessment

Identified risk	Potential impact	Initial rating	Existing control measure	Final rating	Additional action required (by whom & completion date)
e.g. volunteers on site	*Inappropriate contact with children*	*Low*	*Guidelines & code of conduct.*	*Low*	*Review each year by DCT team member*

Appendix 2
Code of Conduct

In keeping with its vision and values, Darjeeling Children's Trust (DCT) is committed to maintaining the highest degree of ethical conduct amongst individuals, international and local, working with DCT. To help increase understanding, this Code of Conduct details DCT's expectations in key areas.

Scope and purpose

This Code of Conduct applies to all individuals, international and local working with DCT. Its purpose is to set out the conduct expected of all individuals. The Code is applicable at all times.

Whilst recognising that local laws and cultures differ considerably from one country to another, DCT is an International Non-Governmental Organisation, and therefore the Code of Conduct is developed from international and UN standards. The DCT team are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

Mission and values

Darjeeling Children's Trust (DCT) works to advance the education, health & well-being of children and young people in Darjeeling and wider West Bengal through the provision and improvement of education and health facilities, through improvements to their living conditions, through sponsorship and through such other charitable activities as may conduce to their general good and personal development.

Code of Conduct Standards

As a member of the DCT team I will:

Uphold the integrity and reputation of DCT by ensuring that my professional and personal conduct is consistent with DCT's values and standards.

- I will treat all people fairly with respect and dignity.
- I will seek to ensure that my conduct does not bring DCT into disrepute and does not impact on or undermine my ability to undertake my role.

· I will observe the rules established for the safety and security of children, young people and vulnerable adults.

· I recognise the position of trust in which I have been placed and I will ensure that the relationships I form with the children, and young people associated with DCT are appropriate.

· I agree to put DCT's safeguarding policy into practice.

Not engage in abusive or exploitative conduct

· I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence.

· I will not exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance.

· I will not engage in sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

· I will not engage in any commercially exploitative activities with children or young people including child labour or trafficking.

· I will not physically assault a child or young person.

· I will not emotionally or psychologically abuse a child or young person.

Ensure the safety, health and welfare of the entire DCT team and associated personnel (volunteers and partners.)

· I will adhere to all legal and organisational health and safety requirements in force at my location of work.

· I will comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines.

· I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others.

Be responsible for the use of information, assets and resources to which I have access by reason of my work with DCT.

· I will ensure that I use DCT assets and resources entrusted to me in a responsible manner and will account for all money and property.

· I will not use DCT IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics or encourages extremism.

· I will not use DCT IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse.

Perform my duties and conduct my private life in a manner that avoids conflicts of interest.

- I will declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of DCT.

- I will not be involved in awarding benefits, contracts for goods or services, employment or promotion within DCT, to any person with whom I have a financial, personal, family (or close intimate relationship) interests.

Uphold confidentiality.

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so. This includes any safeguarding incidents.

Complaints and reports

Members of the DCT team are obligated to bring to the attention of the relevant manager any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code.

Members of the DCT team who have a complaint or concern relating to a breach of the Code should report it immediately to their line manager. If the team member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate member of the team. For example, this could be a senior manager or member of the board of trustees.

In accepting my appointment, I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of this Code.

Name:

Signature:

Date:

Appendix 3

Incident Reporting Form

IN STRICTEST CONFIDENCE WHEN COMPLETED. Any issues recorded that pertain to a child or young person residing in KBM will also be escalated immediately to Pema Bhante.

1.Your Name:	**2. Your Position:**
3. Name of child or young person:	**4. School or Training Institute of child or young person:**
5. Date of birth of child or young person:	**6. Address of school or training institute:**
7. Name and contact details of responsible adult, if appropriate:	**8. Time and date of incident:**
9. Your Observations:	

10. Record of exactly what the child said and what you said: (remember do not lead the child – record the actual details. Continue on separate sheet/s if necessary)		
Signature of DCT :		**Date:**

	To be completed by Safeguarding lead:
11. Action taken so far:	
12. Contact with school or training institute of child or young person if appropriate **Has contact been made? Yes/No – if yes, date and time, name and contact number Record of discussions had.**	

12. Other external agencies contacted: **Police Yes/No – if yes, date and time, name and contact number, case number if given and details of advice received:** **Other – (e.g. third sector organisations) agency, date and time, name and contact number and details of advice received:**		
13. If appropriate, have the child or young person's parents/carers been notified?: Yes / No		
Signature of SL:	**Print Name:**	**Date:**

Please remember to maintain confidentiality on a need to know basis.

Appendix 4

DCT Safeguarding Recruitment Policy

Why this policy

This document sets out DCT's policy on suitability and background checks. It is part of DCT's wider safeguarding strategy. The point of employment is an important moment in safeguarding, providing the charity with the opportunity to collect vital information about a potential volunteer or member of staff to help assess their suitability to work with and for children and young adults, and whether this individual is apt to act as an agent and representative of the organisation.

Who this policy applies to

This policy applies to anybody recruited by DCT, including paid employees, volunteers, and trustees. Anybody already recruited or in an ongoing volunteer role will be considered under this new policy and may be required to carry out some of the checks detailed below.

DCT is a charity that works for and with children and vulnerable adults. Seeking to safeguard those children and young adults is a priority for DCT. This policy is therefore concerned with the safety and wellbeing of children and young adults in Darjeeling. Employees and volunteers who are visiting Darjeeling or have a reasonable prospect of visiting Darjeeling and having contact with the children and young adults there are considered in Section A of this policy. Anybody else (ie those based in the UK who will not be having contact with the children and young adults) will be under Section B.

Consequences of this policy

If candidates are asked to carry out one of the checks below and refuse, the charity has the right to refuse employment or engagement until/unless they can be otherwise satisfied as to their suitability for the role. In doing so the charity will consider their obligations to the Charity Commission and the high standards they place on keeping young people and vulnerable adults safe.

If it comes to light that an applicant has withheld information from DCT that would impact safeguarding decisions or has in any way influenced or interfered with the

criminal records checks, the charity may decide to terminate employment/engagement.

Section A

This section applies to those who have a reasonable prospect of coming into contact with children and young adults, including virtually (online). Which suitability checks are most appropriate for those individuals will vary case to case, for example depending on where the applicant is based and the extent of their contact. However, this policy acts as a guide and a helpful minimum standard and the examples below should provide the information needed to determine what checks are most appropriate.

If additional reassurance is required, then additional checks can be made but it's important to note there are legal issues with data protection and a right to privacy which could be invoked if the questions asked by the charity are unnecessarily personal or invasive. If in doubt, discuss with DCT's Safeguarding Lead.

Possible safeguarding checks

DBS checks

There are four types of DBS check. Where DCT employs or recruits a volunteer to work in Darjeeling, they may be eligible for a DBS check if the suitability decision made by DCT in England or Wales.

A basic DBS check can be requested for any overseas aid work, but where a candidate is very likely to work with children or vulnerable adults, they will be engaging in regulated activities, which means DCT can seek an enhanced check. If there's only a chance that somebody will be taking part in regulated activities in the future, or would only do so in exceptional circumstances, then this isn't "very likely" and they may not be eligible for an enhanced check.

The certificate will contain details of both spent and unspent convictions, cautions, reprimands and warnings that are held on the Police National Computer. These will be UK records.

DCT will consider what checks are most appropriate and will apply for DBS certificates for candidates (if the right conditions are met) as part of the charity's safeguarding policy. If a DBS certificate isn't requested, the reasons why should be recorded.

DCT will use this tool to check what DBS check can be requested on a candidate depending on what activities they're engaging in: Find out which DBS check is right for your employee - GOV.UK (www.gov.uk)

ICPC checks

In addition to the DBS check there is an International Child Protection Certificate which covers criminal conviction and non-conviction information from other foreign

countries disclosed to the UK through existing exchange mechanisms. The information provided on an ICPC is broadly similar to that on a DBS certificate. This certificate could help where an additional level of scrutiny or reassurance is required, for example when a candidate has significant history outside England and Wales.

In some cases, both checks may be useful. A DBS check can provide UK-specific information, while an ICPC focuses on overseas child protection so there is that additional reassurance. Both require the applicant to have lived in the UK.

As above, DBS can only provide enhanced vetting checks for regulated activities where the employment decision is made in the UK. In cases that don't quite meet that criteria, the ICPC may be a good option for vetting of employees and volunteers looking to work in Darjeeling.

Overseas checks

If an individual has never lived in the UK, or has lived outside the UK for the majority of their time, the DBS and ICPC checks may not provide a complete view of their criminal record. It may be appropriate in certain circumstances to obtain overseas criminal records checks.

DCT will follow Home Office guidance[1] for the appropriate country. If the criminal records check is required in India, they will consult with the local police station.

Self- declaration forms

In certain circumstances, for example if the above checks are challenging because of time constraints or administrative issues, or because an additional level of reassurance is required, DCT may ask applicants to complete a self-declaration form. This is a form that allows the candidate to declare any relevant criminal convictions or history, and any potential issues that would cause safeguarding concerns, including previous disciplinary actions.

If the candidate is going to be in contact with children and vulnerable adults, they can be asked for their spent and unspent criminal convictions (and would use Form A self-declaration form). If they are not engaged in those activities, consult Section B below.

Examples

1. Volunteer or employee who is based in E&W and has plan to come into contact with children/young adults in Darjeeling. Decision being made by DCT in E&W.

   If the candidate is based or has ever lived in E&W then they will have UK police records. If they are engaging in a regulated activity (contact with children) then a standard or enhanced DBS check is the suitable form of check. This should be applied for at the point of recruitment, with the position dependant on the DBS result. It is important that the candidate does not start regulated activity until the result of the DBS is shared with the charity.

   Consider also a self-declaration form if additional reassurances are required. Suitable form is Form A (annexed).

Volunteer or employee who is living or has lived abroad and is going to come into contact with children/young adults.

If the candidate has ever lived in the UK and had a UK address, then the ICPC may be the appropriate certificate to obtain. If they have not had a UK address DCT will take a view on whether it's appropriate to obtain overseas criminal records. The DBS strongly recommends carrying out separate overseas criminal records checks where possible, and DCT should record the reasons why an overseas check couldn't be obtained in cases where there are no UK police records available either.

If the person is living in Darjeeling a local check could be undertaken with the Indian authorities. For India the suitable check is a local police report or a police clearance report which is available via direct application to an Indian police service in the applicant's local jurisdiction or via local regional passport office.

In this situation the charity may also consider obtaining local employment and character references, conducting a safeguarding interview with the candidate, and asking the candidate to complete a self-declaration form. The template forms A and B apply to candidates in England and Wales. A tailored form can be created for candidates from outside E&W on a case by case basis.

If the charity is unable to obtain relevant information and remains unsure about the candidate's suitability, they may refuse employment. If they decide to recruit and later on a piece of information comes to their attention that impacts safeguarding, and the candidate reasonable knew and did not share with the charity, DCT can decide to terminate employment.

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Section B

If DCT has confirmed that an individual isn't eligible for an enhanced or standard DBS check, if they're not taking part in regulated activity ie. contact with children, the charity can still consider requesting a basic check on their behalf. A basic check can be requested for any applicant who isn't eligible for a higher level of check, and will detail any unspent convictions they have, most commonly referred to as anything recent or serious.

This may not be necessary in every case, but as a charity that works for children and communities, it is important DCT upholds high standards of professionalism. It is reasonable to expect key trustees and representatives to be DBS checked. It may not be necessary for other employees or volunteers who have less prominent roles and don't have contact with the children.

There's no legal requirement that all trustees must have a certain level of DBS check, but an organisation is allowed to ask any trustee to have a basic check.

DCT can also consider a self-declaration form for those without contact with children and vulnerable adults. The appropriate form would be template B, which only asks for information on spent criminal convictions.

Examples

1. New trustee is recruited without plans to travel to Darjeeling and with no virtual contact with children or vulnerable adults.

   DCT can ask the trustee to get a basic DBS check. They may also consider a self-declaration form as an additional layer of reassurance.

2. Volunteer or employee based in E&W without plans to travel to Darjeeling and with no virtual contact with children or vulnerable adults. This person is going to be speaking at events about DCT and will play a prominent role in fundraising and media.

   If the candidate is going to be a prominent public representative for the charity it is reasonable to ask them to apply for a basic DBS check. Instead of that, or in addition, DCT may ask them to complete self-declaration form B. References should also be taken.

3. Volunteer or employee based in E&W without plans to travel to Darjeeling and with no virtual contact with children or vulnerable adults. Helps with desktop research.

   This person does not have a prominent role and doesn't take part in regulated activity. It's not necessary to ask them to get a DBS check. It may be that self-declaration form B is a disproportionate ask. The charity may instead ask them in interview/on offer of employment for the candidate to inform them of anything that may impact their safeguarding position, and reserve the right to cease employment if something comes to light.

Data handling and storage

The DBS/ICPC certificate will be issued to the individual. DCT will ask to see the certificate to ensure that they are recruiting suitable people into their organisation.

DCT will keep a record of that check, to reflect that the appropriate policies have been followed. This may include keeping a copy of the certificates.

All information candidates provide will be treated as confidential and managed in accordance with relevant data protection legislation and guidance, meaning personal data will not be kept for longer than needed. DCT's standard retention period for any personal data related to safeguarding and vetting is for the complete period of time the relevant person is in employment/a voluntary role, and for five years afterwards to retain enough data to enable the organisation to address any subsequent safeguarding concerns and defend any possible future legal claims. Any data that could not possibly be relevant to such a claim or safeguarding concern will be deleted.

All personal and sensitive information on candidates will be stored in a password protected folder and access will only be provided to a proportionate number of people, most probably the safeguarding and employment lead and key trustees.

Candidates have a legal right to access any information held about them, and DCT will respond within the appropriate time frames to any data subject access requests. At all times DCT will comply with GDPR.

Helpful resources:

DBS checks for people working overseas | NCVO

Working with adults in the charity sector and overseas aid organisations - GOV.UK (www.gov.uk)

www.gov.uk/find-out-which-DBS-check-is-right-for-your-employee

www.acro.police.uk

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[1] Home Office 'Criminal records checks for overseas applicants' guidance

Appendix 5
Communications Protocol

Purpose

These guidelines set out the standards expected for communications relating to Darjeeling Children's Trust (DCT). All interactions should be conducted in a way that protects children and young people, maintains appropriate boundaries and reflects DCT's values.

General Principles

The safety, wellbeing and dignity of children and young people must be the priority in all DCT communications.

All communications should:

- be **professional**, **clear**, **respectful** and **age-appropriate**;
- maintain **appropriate boundaries** between adults and children and young people;
- protect the **privacy**, **dignity** and **safety** of all individuals, particularly children and young people;
- be **necessary, relevant and appropriate to DCT activities**, with no communication taking place simply for personal or social purposes;
- be mindful that communications may be **shared**, **stored** or **reviewed**, and consider the potential impact of this.

Official DCT communications, including digital and social media communications, should only be conducted through approved platforms and accounts.

Communication with Children and Young People

Communication with children and young people should be **transparent**, use **age-appropriate language** and **relate to DCT activities or their involvement with DCT**.

Wherever possible, communications should take place through approved DCT channels and in ways that provide appropriate visibility and/or oversight.

Staff, Trustees and volunteers must not initiate private or personal communication with children or young people through personal phone numbers, messaging applications or personal social media accounts.

If a child or young person contacts a Trustee, staff member or volunteer through a personal phone number or other private channel, the adult should respond appropriately according to the nature of the contact. Any communication relating to a safeguarding concern should be

responded to appropriately and reported in accordance with DCT's Safeguarding Policy. If the contact is not safeguarding-related, the adult should not continue a private conversation and should redirect the communication to an appropriate DCT channel or member of staff.

Use of Images, Stories and Personal Information

DCT will obtain appropriate consent before using images, names or personal stories of children and young people in its communications.

Children and young people should be involved in decisions about communications concerning them in an age-appropriate way, and their wishes should be respected. Where consent is required, this should be obtained in accordance with DCT's safeguarding and data protection procedures.

Parents or other responsible care givers will be asked to give their consent on their children's behalf if they are under 16 years old.

Consent may be withdrawn at any time, and DCT will respect requests not to participate in communications where reasonably practicable.

All communications should:

- protect identity where appropriate, particularly in sensitive circumstances;
- portray children and young people in a dignified and respectful manner;
- avoid content that could be exploitative, intrusive, misleading or potentially harmful;
- minimise the personal information shared about children and young people.

Internal Communications

Communications between Trustees, staff and volunteers should remain **professional** and **respectful**.

Safeguarding or other sensitive information should be shared only on a **need-to-know basis** and through appropriate and secure channels.

Concerns about communications involving a child or young person should be raised promptly in accordance with DCT's Safeguarding Policy.