

### POLICY ON SAFEGUARDING

### Policy Statement

The Stationers' Company is committed to providing a safe and secure environment for all children (those up to the age of 18) and vulnerable adults, which is free from discrimination on any ground, promotes their welfare and respects their rights, wishes and feelings.

The Stationers' Company will seek to minimise the risk of its members and employees finding themselves in situations where their conduct might, deliberately or accidentally, cause harm to children and vulnerable adults.

The Stationers' Company recognises that children and vulnerable adults can be most exposed to harm when their relationship with others is unequal, such as in the relationship between a teacher and a student, a mentor and a mentee, a trainer and a trainee.

The Stationers' Company is committed to complete transparency in the safeguarding of children and vulnerable adults. It will never seek to cover up any allegations of harm to them and will report annually on all allegations made (whilst keeping all individual details completely confidential) and the outcome of them.

This policy should be read in conjunction with the Stationers' Company's policy on harassment.

# Definition of Safeguarding

Safeguarding is not just about protecting children and vulnerable adults from deliberate harm. It includes a wide range of issues relating to their welfare, health and safety.

Harm can be defined as physical abuse, sexual abuse, emotional (including oral and on-line abuse) and neglect.

The Stationers' Company expects its members and employees to ensure that they do no harm to children and vulnerable adults. Equally importantly, it also expects its members and employees to ensure that they report any concerns that children and vulnerable adults, with whom they have had contact, might be suffering harm by others.

#### Minimising Risk

The Stationers' Company will work with its partners to avoid creating situations in which its members and employees might, deliberately or accidentally, cause harm to children and vulnerable adults.

All Stationers' Governors of Stationers' Crown Woods Academy (SCWA) will have been successfully checked by the Disclosure and Barring Service, as organised by SCWA.

All members and employees who are acting as mentors to students at SCWA will undertake training from SCWA staff and strictly follow the rules established by SCWA for the organisation and management of the mentoring scheme.

All members and employees, who are acting as mentors to other school children, bursary winners, apprentices or others developing their careers in the Company's industry sectors, will have been successfully checked by the Disclosure and Barring Service, as organised by Company. They will also have read, and will follow, the guidance to mentors issued by the Stationers' Foundation.

No children may visit Stationers' Hall, or attend a Stationers' Company event elsewhere, without being accompanied by a 'designated responsible person', acting *in loco parentis*, such as a parent, grandparent, relation, carer or teacher.

No member or employee of the Company, who has not been successfully checked by the Disclosure and Barring Service, will meet with, or be left alone with, a child without the designated responsible person being present.

Bursary winners, apprentices or others developing their careers in the Company's industry sectors will all be allocated a designated responsible person, who will be responsible for their safekeeping during the period of their mentorship programme. This person will not be a member or employee of the Company and will normally be their course tutor, a representative of their training provider or a designated next-of-kin.

The Company's policy on the General Data Protection Regulation will protect children and vulnerable adults from harm caused by the unauthorised release of information about them, including photographs, that may be stored by the Company.

All members and employees of the Stationers' Company will have read the Company's policy on harassment.

## Reporting on concerns

It is the duty of all members and employees to report on any concerns that they may have that a child or vulnerable adult is being abused or neglected.

Whilst such concerns should otherwise be kept completely confidential, they must be passed to the designated responsible person as soon as possible. Members and employees should never promise a child or a vulnerable adult that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interest of the child or vulnerable adult.

If the concern or allegation relates to the designated responsible person, it should be passed, in the case of students of SCWA, to the Chairman of the Governors of SCWA and the Principal of SCWA (if appropriate), or, in all other cases, to the Clerk of the Stationers' Company.

Such concerns will always be documented but such documentation will be subject to the Company's policy on the General Data Protection Regulation.

Where a concern or allegation relates to a member or an employee of the Company, the complaints procedure, as set out below, will always be strictly followed.

#### **Complaints Procedure**

All complaints relating to the SCWA mentoring scheme will be dealt with by SCWA staff according to the rules of the scheme.

All complaints made by a child or vulnerable adult, which involve the conduct of a member or an employee of the Stationers' Company, should be addressed to the Clerk of the Company. If the complaint refers to the conduct of the Clerk, it should be addressed to the Master of the Company.

If a complaint involves any possibility that the law has been broken, it will always be passed immediately to the police to be dealt with in accordance with the law.

All other complaints will be investigated internally. The identity of the complainant will be kept confidential and the Company will ensure that he/she is protected from any additional harm arising from the act of making the complaint.

Investigations will normally be carried out by the Clerk. If the matter relates to the conduct of the Clerk, the Master will create a committee of three Past Masters to undertake the investigation. The complainant and/or the designated responsible person may opt for the investigation to be carried out by a different senior member of the Company's staff or a committee of three Past Masters.

All investigations will be done in liaison with the designated responsible person and the results will be communicated to the designated responsible person in writing.

A record will be kept of all complaints, investigations and outcomes, with the specific details anonymised to protect confidentiality. This record will be subject to the Company's policy on the General Data Protection Regulation.

## Sanctions and disciplinary measures

Any member or employees who has been found to have caused harm to a child or vulnerable adult under the terms of this policy is liable to any of the following sanctions.

- verbal or written warning
- demotion
- removal from office, from the Court or from membership of a committee, withdrawal of Livery privileges
- suspension from membership or employment
- dismissal or loss of membership
- temporary or permanent ban from attendance at Company events

The nature of the sanction will depend on the gravity and extent of the harm caused. It should be remembered that any or all of the above sanctions might be taken in addition to, but also irrespective of, any restriction or punishment imposed by the Courts.

## Implementation of the Policy

The Stationers' Company will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook and in the membership section of the Company's website. All new employees must be trained on the content of this policy as part of their induction into the company and all new members will be informed as to where to find it.

## Monitoring and Evaluation

The Stationers' Company recognises the importance of monitoring this policy and will ensure that it anonymously collects statistics and data as to how it has been implemented and whether or not it is effective.

The Clerk, in consultation with the Master and Wardens' Committee will report to the Court on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.

William Alden Clerk 15 February 2018