



Safeguarding and Insurance through BCT: Frequently Asked Questions

The questions set out below are based on enquiries BCT have received from bat groups. We have answered these questions to the best of our knowledge and understanding, but there is no guarantee that the answers will stand up in the case of an insurance claim. We will keep the safeguarding policy under review and are happy to try and answer further questions. Where necessary, we will refer any questions to our insurers for guidance.

Please note, general safeguarding and insurance enquiries should be routed through the relevant primary bat group contact with BCT i.e. Claudia Gebhardt (cgebhardt@bats.org.uk) for bat groups in Scotland, and Abby Packham (batgroups@bats.org.uk) for bat groups in all other parts of the British Islands.

1. Who is BCT's Safeguarding Officer? Should we set up a communication route for bat groups to contact this person?

BCT's Safeguarding Officer is Peter Crome, Head of Operations.

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As per section 2 of the policy, bat groups which use BCT's insurance must ensure Safeguarding Officer responsibilities are designated within the Group and that complaints and whistleblowing measures are in place.

If a bat group member is concerned about the safety/wellbeing of a child or vulnerable adult: inform the bat group person with safeguarding responsibilities who will decide whether a safeguarding agency needs to be involved

If a bat group member believes a child or vulnerable adult is in immediate danger: report this immediately to the Police or other appropriate agency (and report subsequently to the bat group person with safeguarding responsibilities).

If there is an allegation against a bat group member: the bat group person with safeguarding responsibilities should email pcrome@bats.org.uk with details of the allegation **without delay**.

2. It seems that all groups covered by the insurance will have to have policies for these issues. Will it be enough for groups to sign up to BCT's policies, or will they have to formally adopt their own?

Bat groups making use of our insurance must comply with BCT policies. They can use the BCT

policies exactly as shared (but do need to identify someone within the bat group who will have Safeguarding Officer responsibilities). BCT does not have the resources to check the policies that bat groups write themselves. However, provided those policies comply with the intentions, values, principles, responsibilities and relevant arrangements contained in BCT's policy they can of course have their own policies (indeed, some of the larger bat groups with lottery funded projects, for example, may already have their own policies in place).

3. May we have a copy of the BCT policies listed in section 4 of the safeguarding policy?

These are documents that BCT intends to produce and will be provided to bat groups as soon as they are available. We didn't want to hold-up provision of the safeguarding policy until these were completed. If you have any questions about these additional policies before they are available please do get in touch (see above for contacts).

4. Do bat groups need to have their own safeguarding officer?

As per section 2 of the policy bat groups which use BCT's insurance must ensure Safeguarding Officer **responsibilities** are designated within the Group and that complaints and whistleblowing measures are in place. It doesn't have to be a separate role, for example it could be part of the position of Chair, Events Officer, Secretary, etc.

5. What if no one wants to take on the role within the bat group?

Someone does need to have oversight and responsibility to make sure the safeguarding policy is followed. It doesn't have to be a separate role, for example it could be part of the position of Chair, Events Officer, Secretary, etc. However, someone **must** be identified to take on this role for the insurance through BCT to be valid.

6. How do we implement the policy? Are you able to provide guidance on what this means for us in practice?

The BCT document is a combination of policy and procedure, for example any activity should be risk assessed, this is an existing requirement of the insurance policy, so safeguarding should be included as a separate line within that risk assessment, i.e. you need to consider if there is a safeguarding risk within any given activity, what control actions should be taken, etc.

BCT is aiming to develop some example risk assessments with safeguarding in mind and will share these in due course.

7. What is the "DBS Check Guidance Note" referred to on p. 7, section 3.4.1 of the policy?

This is a BCT document which provides some guidance around the Disclosure barring Service checks that are required of people who work unsupervised with children and vulnerable adults. This document is available on the BCT website at:

<https://www.bats.org.uk/resources/resources-for-bat-groups/insurance-cover-for-bat-groups> alongside a supporting document from SAFEcic UK that bat groups may find helpful.

8. If a DBS Check is required can we organise this through BCT?

Unfortunately DBS checks cannot be organised through BCT for bat group members only for BCT staff. If you require a DBS check for a project or events please see:

<https://www.gov.uk/government/collections/dbs-checking-service-guidance--2>

9. In the compliance statement document what constitutes "full knowledge of other members of the group"?

This is here to ensure that any activities which are to be potentially covered by the insurance will have been undertaken in accordance with bat group (and relevant BCT) policies and procedures. The requirement that activities are undertaken with the knowledge of other members of the bat group has been part of the insurance for many years. It helps to ensure that claims do not arise from events organised by someone who happens to be a member of a bat group but has not adhered to the group (or relevant BCT) policies, e.g. they have not completed a risk assessment, or they have failed to do other things that would make the insurance cover invalid.

Bat groups can decide for themselves how "full knowledge of other members of the group" is implemented. It doesn't mean that every member of the group needs to be informed about an activity but rather that it is in some way recognised as an official bat group activity that is in line with insurance requirements.

10. Are all adults with disabilities considered as vulnerable? Does this apply to people with Asperger's, autism, how about people who are blind or deaf? There are many very competent bat workers with disabilities but this policy could be interpreted as meaning they are not allowed to be left on their own without some form of consent.

The short answer to 'whether all adults with disabilities are considered as vulnerable' is no, but it's not an exact science!

In the definition of 'vulnerable' in 1.5.2, BCT feels the emphasis is on vulnerable on account of the "needs for care and support". The list provides *guidance* as to the type of people who may fall into this category. People on the autistic spectrum, or other people with disabilities and health conditions may lead relatively successful and independent lives but still be vulnerable because of their needs for care and support. Just because a person appears able, does not mean they are not vulnerable. It is difficult for BCT, or anyone, to be prescriptive about vulnerability.

It is not always possible for an organisation to recognise if someone is vulnerable and we cannot be responsible for recognising it in cases where it is not apparent. The spirit of the policy is about raising awareness within our organisations that where someone discloses they are vulnerable, the policy will come into play.

If we are aware of a disability in someone who has proved themselves competent, it could be argued that it would be discriminatory to treat that person as vulnerable. BCT would interpret the statements in 1.5.4 and 3.1.2, as relating to adults who have been disclosed as vulnerable and/or where they are in need of care.

11. Is it the responsibility of bat groups to check on local authority policies in their area and ensure that these are complied with?

Section 4 of the policy references guidance from the local authority within whose area BCT headquarters are located. Local authorities in your area may also provide guidance so we suggest that bat groups check the website of their relevant local authority (or authorities).

This is a suggestion rather than a requirement. We have shared the outside sources of information that we have used in forming our policy in case groups wish to do the same. It is

helpful to understanding what local arrangements are in place in advance of any safeguarding incident, as you may need to go to your local authority safeguarding team.

There is also information available from the various regulatory bodies of charities:

- The Charities Commission www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities
- National Council for Voluntary Organisations (NCVO) www.ncvo.org.uk/practical-support/information/safeguarding

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