

# Multi-agency guidance for safer working practice for adults who work with children and young people in the Rochdale Borough

## 1. Overview

This guidance has been produced for adults who work with children and young people in the Rochdale borough to help them to establish the safest possible working environments which safeguard children and reduce the risk of being falsely accused of improper or unprofessional conduct.

The document brings together the Government Office North West ***Guidance for Safer Working Practice for Adults who Work with Children and Young People*** and the Safer Recruitment Consortium ***Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings***. (Both documents were originally published in 2009 were later archived by the government. [Safer Working Practice for Adults who work with Children and Young People in Educational Settings](#) was reviewed and updated in 2015 to reflect new and emerging professional conduct issues and this was updated again in May 2019 by the Safer Recruitment Consortium).

## 2. Status of the Document

This document has been endorsed by the Rochdale Borough Safeguarding Children Partnership. It is a generic document for all adults working with children, young people and families in the Rochdale borough. The guidance should complement existing professional procedures and protocols but is not intended to replace or take priority over advice or codes of conduct produced by employers or national bodies. It is for guidance only and should be used in line with the organisations internal policies and procedures. For unregulated individuals, parents groups, private foster carers etc. this guidance may be adopted to guide and assist in understanding safer working practices.

If agencies or employers adopt this guidance they should ensure that all staff and volunteers are aware of its contents. It is also good practice to notify parents, carers, children and young people that this guidance must be followed by all workers within the organisation.

### 3. Purpose of the guidance

It is important that all adults working with children and young people in the Rochdale borough understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This practice guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. The guidance aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist adults working with children to work safely and responsibly and to monitor their own standards and practice;
- support managers and employers in setting clear expectations of behaviour and/or codes of practice relevant to the services being provided;
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- support safer recruitment practice;
- minimise the risk of misplaced or malicious allegations made against adults who work with children and young people;
- reduce the incidence of positions of trust being abused or misused.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that this guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by their employer. It is expected that in these circumstances adults will always advise their senior colleagues of the justification for any such action already taken or proposed.

### 4. Underpinning Principles & Responsibilities

- The welfare of the child is paramount.
- All practitioners should understand their responsibilities to safeguard and promote the welfare of children and young people. Anyone who has concerns or is in doubt should refer to the document [What To Do If You're Worried a Child Is Being Abused](#) and follow that guidance.
- All practitioners who work with children are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- All practitioners should work and be seen to work, in an open and transparent way.
- All practitioners should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be recorded and reported.
- All practitioners should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern.
- All practitioners should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.
- Practitioners should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
- All practitioners should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other

proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity.

- All practitioners and managers should continually monitor and review practice to ensure this guidance is followed.
- All practitioners should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the Rochdale Borough Safeguarding Children Partnership [multi agency safeguarding procedures](#).
- It is good practice for organisations to inform parents/carers and the children and young people they work with about this document, the organisation's responsibility to follow child protection policies, arrangements for managing allegations against staff, and the Rochdale Borough Safeguarding Children Partnership [multi agency safeguarding procedures](#).
- Employers have duties towards their employees and others under Health and safety legislation which requires them to take steps to provide a safe working environment for their staff.
- Legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's Health and Safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.
- It is the responsibility of organisations to ensure that their staff and volunteers comply with the legislation and guidance that supports this document, including the Children Act 1989 & 2004, Child and Adoption Act 2006, Childcare Act 2006, Sexual Offences Act 2003, Serious Crime Act 2015, Children and Social Work Act 2017, General Data Protection Regulations Act 2018, Data Protection Act 2018 and other relevant legislation.

## 5. Definitions.

For ease of reading references will be made to;

- 'Organisations' or 'agencies' meaning any organisation or agency where people may work or volunteer with children and young people.
- 'Children and Young People' – this refers to children and young people from birth to the age of 18 years.
- 'Adults, Staff and Volunteers' – references made to adults, staff and volunteers refer to those who work with children and young people in an organisation in either a paid or unpaid capacity. This could include for example managers, governors, directors, trustees, staff, volunteers, students on placement. This also includes staff commissioned into an organisation or agency from another organisation or agency.
- 'Allegation' means where it is alleged that a person who works with children or young people has:
  - Behaved in a way that has harmed or may have harmed a child;
  - Possibly committed a criminal offence against or related to a child; or,
  - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

## 6. Making professional judgements

<p>This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for adults in all circumstances. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which adults have to make decisions or take action in the best interest of a child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.</p> <p>Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.</p>	<p><i>This means that where no specific guidance exists adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>discuss the circumstances that informed their action, or their proposed action, with their line manager or, where the adult does not work for an organisation, with the parent or carer. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted</i></li> <li>• <i>always discuss any misunderstanding, accidents or threats with their line manager</i></li> <li>• <i>always record discussions and actions taken with their justifications</i></li> <li>• <i>record any areas of disagreement and, if necessary refer to the <u>RBSCP escalation policy</u></i></li> </ul>
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## 7. Power and positions of trust and authority

<p>As a result of their knowledge, position and/or the authority invested in their role, all those working with children and young people are in a position of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one person is in a position of power or influence over another by virtue of their work or the nature of the activity.</p> <p>It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.</p> <p>The potential for exploitation and harm of vulnerable children and young people means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.</p> <p>Adults should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident.</p>	<p><i>This means that adults <b>should not</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>use their position to gain access to information for their own advantage and/or a child/young person's or family's detriment</i></li> <li>• <i>use their power to intimidate, threaten, coerce or undermine children and young people</i></li> <li>• <i>use their status and standing to form or promote relationships which are of a sexual nature, or which may become so</i></li> </ul>
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## 8. Confidentiality

The storing and processing of personal information is governed by the General Data Protection regulations 2017 (GDPR) and Data Protection Act 2018. Employers should provide clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.

Adults may have access to special category personal data about children, young people and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.

Adults should never use confidential or personal information for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child/young person's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which adults may be expected to share information about a child or young person, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, in line with [local safeguarding procedures](#).

If a child/young person – or their parent / carer – makes a disclosure regarding abuse or neglect, the adult the disclosure has been made to should follow their own agency's procedures and [local guidance](#). The adult should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

If an adult is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member

*This means that agencies and organisations should:*

- *Ensure that all adults who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that an adult gains consent or if to gain consent would place a child at risk*

*This means that adults **should**:*

- *know the name of the lead for safeguarding within their organisation and be familiar with RBSCP multi-agency protection procedures and guidance:*
- *treat information they receive about children, young people and families in a discreet and confidential manner*
- *seek advice from a senior member of staff (designated safeguarding lead) if they are in any doubt about sharing information they hold or which has been requested of them*
- *be clear about when information can/ must be shared and in what circumstances*
- *know the procedures for responding to allegations against adults and to whom any concerns or allegations should be reported*
- *ensure that where personal information is recorded using modern technologies that systems and devices are kept secure*

of staff or nominated safeguarding lead.

Any media or legal enquiries should be passed to senior management.

## 9. Standards of behaviour

All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard their welfare and best interests.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Adults should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in disciplinary action, a bar from engaging in regulated activity, or action by another relevant regulatory body.

The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS children's barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled. A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Private childcare settings, as well as schools, are also prohibited from employing a disqualified person in respect of early or later years childcare.

*This means that adults **should not**:*

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model*
- *make, or encourage others to make sexual remarks to, or about, a child*
- *use inappropriate language to or in the presence of children*
- *discuss their personal or sexual relationships with or in the presence of children*
- *make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such*

*This means that adults **should**:*

- *be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal lives, may impact on their work with children*
- *understand that a person who provides Early Years education or Childcare in domestic settings may be disqualified because of their "association" with a person living or employed in the same household who is disqualified.*

## 10. Dress and appearance

<p>A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However adults should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Adults should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.</p>	<p>This means that adults <b>should</b> wear clothing which:</p> <ul style="list-style-type: none"> <li>• <i>promotes a positive and professional image</i></li> <li>• <i>is appropriate to their role</i></li> <li>• <i>is not likely to be viewed as offensive, revealing, or sexually provocative</i></li> <li>• <i>does not distract, cause embarrassment or give rise to misunderstanding</i></li> <li>• <i>is absent of any political or otherwise contentious slogans</i></li> <li>• <i>is not considered to be discriminatory</i></li> <li>• <i>is compliant with professional standards</i></li> </ul>
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## 11. Gifts, rewards, favouritism and exclusion

<p>Organisations should have policies in place regarding the giving of gifts or rewards to children and young people and the receiving of gifts from them or their parents/carers and everyone should be made aware of and understand what is expected of them.</p> <p>Adults need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.</p> <p>There are occasions when children, young people or their families may wish to pass small tokens of appreciation to practitioners e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.</p> <p>Similarly, it is inadvisable to give such personal gifts to children, young people or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.</p> <p>Any reward given to a child or young person should be in accordance with agreed practice, consistent with the organisation's policy, recorded and not based on favouritism.</p> <p>Adults should exercise care when selecting children for specific activities, jobs or privileges in</p>	<p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>be aware of and understand their organisation's relevant policies, e.g. rewarding positive behaviour</i></li> <li>• <i>ensure that gifts received or given in situations which may be misconstrued are declared and recorded</i></li> <li>• <i>only give gifts to a child or young person as part of an agreed reward system</i></li> <li>• <i>where giving gifts other than as above, ensure that these are of insignificant value and given to all children and young people equally</i></li> <li>• <i>ensure that all selection processes which concern children and young people are fair and these are undertaken and agreed by more than one member of staff</i></li> <li>• <i>ensure that they do not behave in a manner which is either favourable or unfavourable to individual children</i></li> </ul>
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order to avoid perceptions of favouritism or injustice. Similar care should be exercised when children and young people are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

## 12. Infatuations and ‘crushes’

All adults need to recognise that it is not uncommon for a child or young person to be strongly attracted to an adult and/or develop a ‘crush’ or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

Any adult who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to their line manager. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

The line manager should give careful thought to those circumstances where the staff member, child/young person and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

*This means that adults **should**:*

- *report any indications (verbal, written or physical) that suggest a child or young person may be infatuated with an adult*
- *always maintain professional boundaries*

*This means that senior managers should:*

- *put action plans in place where concerns are brought to their attention*



## 13. Social contact outside of the workplace

It is acknowledged that adults who work with children and young people may have genuine friendships and social contact with their parents. Adults should, however, also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse. It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purpose of sexual exploitation or radicalisation. (See also Grooming Offences Page 10)

Staff should recognise that some types of social contact with children, young people or their families could be perceived as harmful or exerting inappropriate influence on children, and bring the organisation into disrepute (e.g. attending a political protest, circulating propaganda).

If a child, young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family. Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

*This means that adults **should**:*

- *always approve any planned social contact with children, young people or parents with senior colleagues.*
- *advise senior management of any regular social contact they have with a child or young person which could give rise to concern*
- *refrain from sending personal communication to children, young people s or parents unless agreed with senior managers*
- *inform senior management of any relationship with a parent where this extends beyond the usual parent/professional relationship*
- *inform senior management of any requests or arrangements where parents wish to use their services outside of the workplace (e.g. babysitting, tutoring) and seek appropriate agreements and approval by management.*

## 14. Communication with children and young People (including the use of technology)

In order to make best use of the many educational and social benefits of new and emerging technologies, children and young people need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.

Adults should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.

Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand held devices. (Given the ever changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Adults should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'

Adults should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

Adults should, in any communication with children, also follow the guidance in Section

*This means that adults **should**:*

- *only make contact with children for the purpose of their work, this should be agreed by managers and the appropriate work equipment, rather than personal equipment should be used.*
- *not give out their personal details*
- *use only equipment and internet services provided by their agency/organisation*
- *follow their agency/organisation's acceptable use policy and online safety guidance*
- *ensure that their use of technologies could not bring their employer into disrepute*
- *not discuss or share data relating to children, parents or carers in staff social media groups*

## 9 'Standards of behaviour'.

Adults should adhere to their establishment's policies, including those with regard to communication with parents and carers and the information they share when using the Internet.

### **The Sexual Offences Act involving the Internet and 'grooming'**

It is an offence under the Sexual Offences Act 2003 to meet a child following sexual grooming, which makes it a crime to befriend a child on the internet or by other means and meet or intends to meet the child with the intention of abusing them. The maximum sentence is 10 years imprisonment.

Section 67 of the Serious Crime Act 2015 introduced an offence of sexual communication with a child. This applies to an adult who communicates with a child and the communication is sexual or if it is intended to elicit from the child a communication which is sexual and the adult reasonably believes the child to be under 16 years of age. The offence covers both online and offline communication including social media, email, texts, letters etc. The Act also amended the Sex Offences Act 2003 so it is now an offence for an adult to arrange to meet with someone under 16 having communicated with them on just one occasion (previously it was on at least two occasions).

## 15. Physical contact

There are occasions when it is entirely appropriate and proper for adults to have physical contact with children and young people, that they only do so in ways appropriate to their professional role and in relation to the child or young person's individual needs and any agreed care plan.

Not all children and young people feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the child or young person's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Adults

*This means that adults **should**:*

- *be aware that even well intentioned physical contact may be misconstrued by the child, young person, an observer or any person to whom this action is described*
- *never touch a child or young person in a way which may be considered indecent*
- *always be prepared to explain actions and accept that all physical contact be open to scrutiny*
- *never indulge in horseplay or fun fights*
- *always allow/encourage children*

should acknowledge that some children and young people are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Adults should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact and/or form of communication which is acceptable to the individual.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child/young person, in one set of circumstances, may be inappropriate in another, or with a different child/young person. Any physical contact should be in response to the Child/young person's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should therefore, use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If an adult believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the manager and recorded. Where appropriate, the manager should consult with the Local Authority Designated Officer (LADO). Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Adults need to be aware that the child may associate physical contact with such experiences. They also should recognise that these children and young people may seek out inappropriate physical contact. In such circumstances adults should deter the child sensitively and help them to understand the importance of personal boundaries. A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each child. Children and young people with disabilities may require more physical contact to assist their everyday activity. The arrangements should be understood and agreed by all concerned, justified in terms of the child/young person's needs, consistently applied and open to scrutiny.

*and young people, where able, to undertake self-care tasks independently*

- *ensure the way they offer comfort to a distressed child or young person is age appropriate*
- *always tell a colleague when and how they offered comfort to a distressed child or young person*
- *establish the preferences of children and young people*
- *consider alternatives, where it is anticipated that a child or young person might misinterpret or be uncomfortable with physical contact*
- *always explain to the child or young person the reason why contact is necessary and what form that contact will take*
- *report and record situations which may give rise to concern*
- *be aware of cultural or religious views about touching and be sensitive to issues of gender*

## 16. Other activities that require physical contact

Adults who work in certain settings, for example, sports, drama, dance or outdoor activities may need to initiate some physical contact, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, or support a child so they can perform an activity safely or prevent injury.

Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the child or young person. Contact should be relevant to their age / understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the child/young person.

Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports governing bodies and should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent or carer.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities.

Keeping parents/carers and children and young people informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

*This means that organisations **should**:*

- ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management
- provide staff, on a 'need to know' basis, with relevant information about vulnerable children in their care

*This means that adults **should**:*

- *treat children and young people with dignity and respect and avoid contact with intimate parts of the body*
- *always explain to a child/young person the reason why contact is necessary and what form that contact will take*
- *seek consent of parents where a child/young person is unable to give this e.g. because of a disability*
- *consider alternatives, where it is anticipated that a child/young person might misinterpret any such contact*
- *be familiar with and follow recommended guidance and protocols*
- *conduct activities where they can be seen by others*

## 17. Intimate / personal care

Organisations should have clear nappy or pad changing and intimate / personal care policies which ensure that the health, safety, independence and welfare of children is promoted and their dignity and privacy are respected.

Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems. Children and young people should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in the vicinity who is aware of the task to be undertaken and that, wherever possible, they are visible and/or audible. Intimate or personal care procedures should not involve more than one member of staff unless the child or young person's care plan specifies the reason for this. A signed record should be kept of all intimate and personal care tasks undertaken and, where these have been carried out in another room, should include times left and returned.

Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual child or young person's care plan. The views of parents, carers and the child/young person, regardless of their age and understanding, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements.

Children and young people are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering. However, there needs to be an appropriate level of supervision in order to safeguard children and young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

*This means that organisations **should**:*

- *have written care plans in place for any child or young person who could be expected to require intimate care*
- *ensure that children and young people are actively consulted about their own care plan*

*This means that adults **should**:*

- *adhere to their organisation's intimate and personal care and nappy changing policies*
- *make other staff aware of the task being undertaken*
- *always explain to the child/young person what is happening before a care procedure begins*
- *consult with colleagues where any variation from agreed procedure/care plan is necessary*
- *record the justification for any variations to the agreed procedure/care plan and share this information with the child/young person and their parents/carers*
- *avoid any visually intrusive behaviour*
- *where there are changing rooms announce their intention of entering*
- *always consider the supervision needs of the children and young people and only remain in the room where their needs require this*

*This means that adults **should not**:*

- *change or toilet in the presence or sight of children/young people*
- *shower with children or young people*
- *assist with intimate or personal care tasks which the child or young person is able to undertake independently*

## 18. Behaviour management

All children and young people have a right to be treated with dignity and respect even in those circumstances where they display difficult or challenging behaviour.

Adults should not use any form of degrading or humiliating treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children and young people is completely unacceptable.

Where children/young people display difficult or challenging behaviour, adults should follow the behaviour policy outlined by their place of work and use strategies appropriate to the circumstance and situation.

Where a child or young person has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties, including, for example, a medical officer where appropriate.

Senior managers should ensure that the establishment's behaviour policy includes clear guidance about the use of isolation and seclusion.

The legislation on these strategies is complex and adults should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the child/young person's human rights and/or false imprisonment.

*This means that adults **should**:*

- *not use force as a form of punishment*
- *try to defuse situations before they escalate e.g. by distraction*
- *keep parents informed of any sanctions or behaviour management techniques used*
- *be mindful of and sensitive to factors both inside and outside of the organisations which may impact on a child/young person's behaviour e.g. bullying, abuse, exploitation or neglect*
- *follow the organisation's behaviour management policy*
- *behave as a role model*
- *avoid shouting at children other than as a warning in an emergency/safety situation*
- *refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)*
- *be aware of the legislation and potential risks associated with the use of isolation and seclusion*
- *comply with legislation and guidance in relation to human rights and restriction of liberty*

## 19. The use of control and physical intervention

There are circumstances in which adults working with children and young people displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. This is a complex area and organisations must have regard to government guidance and legislation and the policies and practice of their specific organisation.

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behaviour to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances.

When physical intervention is used it should be undertaken in such a way that it maintains the safety and dignity of all concerned.

The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used and the techniques deployed in line with recommended policy and practice.

Under no circumstances should physical force or intervention be used as a form of punishment. The duty of care which applied to all adults and organisations working with children and young people requires that reasonable measures are taken to prevent children being harmed. The use of unwarranted physical force is likely to constitute a criminal offence.

In settings where restrictive physical interventions may need to be employed regularly, i.e. where adults are working with children with extreme behaviours associated with learning disability or autistic spectrum disorders, the employer should have a policy on the use of such intervention, as part of a wider behaviour management policy. Individual care

*This means that adults **should**:*

- *adhere to the organisation's physical intervention policy*
- *always seek to defuse situations*
- *always use minimum force for the shortest period necessary*
- *record and report as soon as possible after the event any incident where physical intervention has been used*

*This means that organisations **should**:*

- *have a policy on the use of physical intervention in place that complies with government guidance and legislation and describes the context in which it is appropriate to use physical intervention*
- *ensure that an effective recording system is in place which allows for incidents to be tracked and monitored*
- *ensure that adults are familiar with and adhere to the policy on physical intervention*
- *ensure that staff are appropriately trained*



plans, drawn up in consultation with parents/carers and where appropriate, the child or young person, should set out the strategies and techniques to be used and those which should be avoided. Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported. This should include written and signed accounts of all those involved, including the child/young person. The parents/carers should be informed the same day.

## 20. Sexual conduct

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual behaviour between an adult and a child or young person with whom they work is unacceptable. Under the Sexual Offences Act 2003, sexual activity between a child under 18 and a person in a position of trust constitutes a criminal offence.

Children and young people are protected by specific legal provisions regardless of whether the child/young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children or young people to engage in or watch sexual activity or the production of pornographic material.

“Working Together to Safeguard Children” (2018), defines sexual abuse as “forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening”.

*This means that adults **should**:*

- *not have any form of sexual contact with a child or young person*
- *avoid any form of touch or comment which is, or may be considered to be, indecent*
- *avoid any form of communication with a child or young person which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact*
- *not make sexual remarks to or about a child or young person*
- *not discuss their own sexual relationships with or in the presence of children or young people*
- *not discuss sexual matters with or in the presence of children or young people unless part of their recognised job role*

There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour. Adults should also be aware of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a child or young person is being groomed.

## 21. One to one situations

All organisations working with or on behalf of children and young people should consider one to one situations when drawing up their policies.

It is not realistic to say that one to one situations should never take place. It is, however, appropriate to state that where there is a need, agreed with a senior manager and/or parents/carers, for an adult to be alone with a child or young person, certain procedures and explicit safeguards must be in place. This also applies to those adults who do not work as part of an agency or organisation but owe a duty of care to the child or young person because of the nature of their work.

Adults should be offered training and guidance for the use of any areas of the workplace which may place themselves or children in vulnerable situations. This would include those situations where adults work directly with children and young people in unsupervised settings and/or isolated areas within community settings or in street based projects for example.

One to one situations have the potential to make children and young people more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable,

*This means that adults **should**:*

- *ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed.*
- *Avoid meeting with a child or young person in remote, secluded areas.*
- *Always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by*
- *avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*
- *always report any situation where a child or young person becomes distressed or angry to a senior colleague*
- *carefully consider the needs and circumstances of the child/young person when in one to one situations*

<p>reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of children and young people and the adults who work with them.</p> <p>There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one to one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis. Meetings with children and young people outside agreed working arrangements should not take place without the agreement of senior managers and parents or carers.</p>	
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## 22. Home visits

<p>There are workers for whom home visits are an integral part of their work. In these circumstances it is essential that appropriate policies and related risk assessments are in place to safeguard children and young people and the adults who work with them.</p> <p>A risk assessment should include an evaluation of any known factors regarding the child/young person, parents and others living in the household.</p> <p>Risk factors such as hostility, child protection concerns, complaints or grievances can make adults more vulnerable to an allegation. Specific consideration should be given to visits outside of 'office hours' or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed. Where little or no information is available, visits should not be made alone.</p> <p>There will be occasions where risk assessments are not possible or not available, e.g. when emergency services are used. In these circumstances, a record must always be made of the circumstances and outcome of the home visit. Such records must always be available for</p>	<p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social workers</i></li> <li>▪ <i>adhere to agreed risk management strategies</i></li> <li>▪ <i>always make detailed records including times of arrival and departure and work undertaken</i></li> <li>▪ <i>ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken</i></li> </ul> <p><i>This means that employers <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>ensure that they have home visit and lone-working policies of which all adults are made aware. These should include arrangements for risk assessment and management</i></li> <li>▪ <i>ensure that all visits are justified and recorded</i></li> <li>▪ <i>ensure that adults are not exposed to unacceptable risk</i></li> <li>▪ <i>ensure that adults have access to a mobile telephone and an emergency contact person</i></li> </ul>
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<p>scrutiny.</p> <p>Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a senior manager and the parents or carers and a clear justification for such arrangement is agreed and recorded.</p>	
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## 23. Transporting children and young people

<p>There may be occasions when adults are expected or asked to transport children as part of their duties. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.</p> <p>Adults should not offer lifts to children unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that arise.</p> <p>Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.</p> <p>Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.</p> <p>It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats / booster seats for younger children.</p> <p>Adults should never offer to transport children or young people outside of their normal working duties, other than in an emergency or where not</p>	<p><i>This means that all organisations <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>have appropriate policies for transporting children and young people</i></li> </ul> <p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive</i></li> <li>▪ <i>be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer</i></li> <li>▪ <i>record details of the journey in accordance with agreed procedures</i></li> <li>▪ <i>ensure that their behaviour is appropriate at all times</i></li> <li>▪ <i>ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven</i></li> <li>▪ <i>ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned</i></li> <li>▪ <i>take into account any specific or additional needs of the child</i></li> </ul>
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doing so would mean the child or young person may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s).

## 24. Trips and Outings

Adults should take particular care when supervising children and young people on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.

The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, children or others during trips and outings, and the measures that should be taken to minimise these risks.

Where activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, young people, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring there is a safe staff/child ratio and suitable gender mix of staff.

*This means that adults **should**:*

- *always have more than one adult present in out of workplace activities, unless otherwise agreed with a senior manager*
- *undertake risk assessments in line with their organisation's policy*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times (see sections 4 & 7)*
- *never share beds with a child/children or young people.*
- *not share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with senior manager, parents, carers, children and young people.*

## 25. First Aid and administration of medication

Health and Safety legislation places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first aid arrangements. Any employee may volunteer to undertake this task but it is not a contractual requirement and appropriate training should be given before an individual take on a role which may require administering medication.

It is expected that adults working with children and young people should be aware of basic first aid techniques. It is not however, a contractual

*This means that adults **should**:*

- *adhere to the organisation's policy for administering first aid or medication*
- *comply with the necessary reporting requirements*
- *make other adults aware of the task being undertaken*
- *explain to the child what is happening.*
- *always act and be seen to act in the child's best interests*
- *report and record any administration of first aid or medication*
- *have regard to any health care plan which is*

<p>requirement and whilst adults may volunteer to undertake such tasks, they should be suitably trained and qualified before administering first aid and/or agreed medication.</p> <p>When administering first aid, whenever possible, Adults should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered.</p> <p>In circumstances where children or young people need medication regularly, a health care plan should have been established to ensure the safety and protection of children/young people and the adults who are working with them. Depending on the age and understanding of the child/young person, they should, where appropriate, be encouraged to self-administer medication or treatment, including, for example, the use of ointments, sun creams or inhalers. Adults taking medication which may affect their ability to care for children should seek medical advice regarding their suitability to do so and organisations should ensure that they only work directly with children if that advice confirms that the medication is unlikely to impair their ability to look after children. Risk assessment is likely to recommend that staff medication on the premises must be securely stored and out of reach of children at all times.</p>	<p><i>in place</i></p>
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## 26. Photography, videos and other images

<p>Working with children and young people may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of children and young people. Under no circumstances should adults be expected or allowed to use their personal equipment to take images of pupils at or on behalf of their employer/organisation.</p> <p>Organisations should have arrangements with regard to the taking and use of images, which is linked to their safeguarding and child protection</p>	<p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>only use equipment provided or authorised by the organisation</i></li> <li>▪ <i>only publish images of children where they and their parent / carer have given explicit written consent to do so</i></li> <li>▪ <i>be clear about the purpose of the activity and about what will happen to the images when the activity is concluded</i></li> <li>▪ <i>be able to justify images of children in their possession and store images in an appropriate secure place in the agency or organisation</i></li> </ul>
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policy. This should cover the wide range of devices which can be used for taking/recording images e.g. cameras, mobile-phones, smart phones, tablets, web-cams etc.

Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place.

Children and young people who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc.

Adults should remain sensitive to any child or young person who appears uncomfortable and should recognise the potential for misinterpretation. Any such concerns should be discussed with the Designated Safeguarding Officer.

Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media, or on the Internet.

For the protection of children, it is recommended that when using images for publicity purposes that the following guidance should be followed:

- if the image is used, avoid naming the child, (or, as a minimum, use first names rather than surnames)
- if the child is named, avoid using their image
- organisations should establish whether

- *avoid making images in one to one situations or which show a single child with no surrounding context*
- *ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.*
- *report any concerns about any inappropriate or intrusive photographs found*

*This means that adults **should not**:*

- *take images of children for their personal use*
- *display or distribute images of children unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child)*
- *take images of children using personal equipment*
- *take images of children in a state of undress or semi-undress*
- *take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care*
- *make audio recordings of a child's disclosure*
- *take images of children which could be considered as indecent or sexual*
- *use images which may cause distress*
- *take images 'in secret', or taking images in situations that may be construed as being secretive.*

<p>the image will be retained for further use, where and for how long</p> <ul style="list-style-type: none"> <li>• images should be securely stored and used only by those authorised to do so.</li> </ul>	
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## 27. Exposure to inappropriate images

<p>Organisations should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.</p> <p>There are no circumstances that will justify adult possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children and young people.</p> <p>Accessing, making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images), whether using the organisation's or personal equipment, on or off the premises, is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven.</p> <p>In the event of any indecent images of children/young people or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the police and Local Authority Designated Officer, (LADO) should be immediately informed. Adults should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be at risk of prosecution themselves.</p>	<p><i>This means that organisations <b>should</b></i></p> <ul style="list-style-type: none"> <li>▪ <i>have clear e-safety policies in place about access to and use of the internet by staff volunteers and children and young people.</i></li> <li>▪ <i>Consider the use of password protected use of the internet whilst using work devices to enable tracking appropriate use.</i></li> <li>▪ <i>make guidance available to both adults and children and young people about appropriate usage.</i></li> </ul> <p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>follow their organisation's guidance on the use of IT equipment</i></li> <li>▪ <i>ensure that children cannot be exposed to unsuitable material on the internet</i></li> <li>▪ <i>ensure that any films or material shown to children and young people are age appropriate</i></li> </ul>
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## 28. Personal Living Accommodation including on site provision.

<p>Staff should not invite children and young people to their living accommodation. If this does occur follow section 12. Social contact outside of the workplace guidance.</p> <p>It is not appropriate for staff to be expected or requested to use their personal living space for any activity, play, learning, counselling or support. Managers should ensure that appropriate accommodation for such activities is found within the setting or other workplace.</p> <p>Children should not be asked to assist with jobs or tasks either with or without reward at or in staff's personal or private accommodation.</p> <p>In employment and jobs where personal living space is used (for example child minding) the appropriate checks, risk assessments and safe working guidelines for inspection should be followed.</p>	<p><i>This means that adults <b>should</b>;</i></p> <ul style="list-style-type: none"> <li>• <i>Maintain their privacy at all times being mindful of personal and professional boundaries.</i></li> <li>• <i>Be mindful not to place themselves in vulnerable situations</i></li> <li>• <i>Refuse requests for their personal living accommodation to be used for work purposes.</i></li> <li>• <i>Not ask children to undertake 'jobs' or 'errands'</i></li> <li>• <i>Report to management any contact that a child might initiated at their personal living accommodation so this can be dealt with appropriately.</i></li> </ul>
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## 29. Topic Specific Work/ projects

<p>Many areas of work can include exploring subject matter that is explicit or of a political or religious sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to strategies / subject plans – which should also include risk assessments regarding the responses to the subject matter.</p> <p>This work can be supported by setting ground rules to create safe environments to explore more sensitive issues.</p> <p>Topics can sometimes lead to unplanned discussions of a sensitive nature. Responding to questions and debate requires careful judgement and staff should take guidance in these circumstances from their organisation's safeguarding lead.</p> <p>Organisations should have supporting policies and statements on their involvement in any spiritual, moral, social, cultural, sex &amp;</p>	<p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>Have clear lesson plans that adhere to organisational guidance for the relevant topic areas.</i></li> <li>• <i>Have sought appropriate parental/ carers consent.</i></li> <li>• <i>Clearly be able to link the topic based work to the organisations strategies and plans to cover the topic in question.</i></li> <li>• <i>Follow appropriate lone working policies if this includes 1 to 1 topic based work.</i></li> </ul> <p><i>This means that adults <b>should not</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>Overstep personal or professional boundaries when covering topic based areas.</i></li> </ul>
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<p>relationship education topic work which should be in line with laws and guidance available. Parents and carers have the right to decide to exclude children from some topic areas so this guidance should also be followed.</p>	<ul style="list-style-type: none"> <li>• <i>Enter into or encourage inappropriate discussions which may offend or harm others.</i></li> <li>• <i>Undermine laws and guidance covering these topic areas.</i></li> <li>• <i>Attempt to impose their personal values attitudes or beliefs on children and young people.</i></li> </ul>
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### 30. Whistleblowing

<p>Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Each employer should have a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Adults who use whistle blowing procedures should be made aware that their employment rights are protected.</p> <p>Adults should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children or young people may be at risk</p>	<p><i>This means that organisations <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>have a whistleblowing policy in place which is known to all</i></li> <li>▪ <i>ensure that they have clear procedures for dealing with allegations against adults which are in line with the <a href="#">Rochdale Safeguarding Children Partnership Procedures</a></i></li> </ul> <p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>report any behaviour by colleagues that raises concern regardless of source</i></li> </ul>
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### 31. Sharing concerns and recording incidents

<p>Adults should be aware of their organisation’s safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers.</p> <p>In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported a senior manager without delay. Adults should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards children/young people, so that appropriate support can be provided and/or action can be taken.</p> <p>It is essential that accurate and comprehensive records are maintained wherever concerns are</p>	<p><i>This means that adults <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>be familiar with their organisation’s system for recording concerns</i></li> <li>▪ <i>know how to contact the LADO and Ofsted/regulatory body directly if required</i></li> <li>▪ <i>take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the workplace</i></li> </ul> <p><i>This means that organisations <b>should</b>:</i></p> <ul style="list-style-type: none"> <li>▪ <i>have an effective, confidential system for</i></li> </ul>
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raised about the conduct or actions of adults working with or on behalf of children and young people.

*recording and managing concerns raised by any individual regarding adults' conduct and any allegations against staff and volunteers*