

Safeguarding Policy and Procedure	Version:	2.1
	Status:	Final
	Date:	15/1/21

1. Approval Record

Name	Role	Date
Rebecca Clarke	Head of People	1/8/20

2. Version History

Version	Date	Author	Description (nature of change/update)
0.1	1/6/20	Rebecca Clarke	Initial Creation – Document design proposal
2.0	1/8/20	Rebecca Clarke	Final version
2.1	15/1/21	Rebecca Clarke	Annual review and version control update

3. Related Documents

Document Title	Location	Version Number
Employee Handbook	HR System	V2.1
Recruitment Policy	HR System	V1.1
Anti-Bullying and Anti-Harassment Policy	HR System	V2.1
Equality Opportunities Policy	HR System	V2.1
Whistleblowing Policy	HR System	V1.1
Disciplinary and Grievance Procedure	HR System	V1.1
Anti Slavery and Human Trafficking Policy	HR System	V1.1
Health & Safety Policy	HR System	V2.1
IT Security and Social Media Policy	HR System	V2.1
Company Privacy Notice	HR System	V2.1
Anti-Radicalisation and Extremism Policy	HR System	V2.1

4. Review and Distribution List

Name	Role	Review Required
Gemma Higham	Trainer Network and Quality Assurance Lead	Contributor
Rebecca Clarke	Head of People	Contributor
All Staff		For Information Only

5. Regulatory Requirements

- Children Act 1989, 2004
- Children (Scotland) Act 1995, 2007, 2016
- Children and Young People (Scotland) Act 2014
- Childcare Act 2006
- Limitation (Childhood Abuse) (Scotland) Act 2017
- Education Act 2002, 2011
- Education and Skills Act 2008
- Safeguarding Vulnerable Groups Act 2006
- Protection of Vulnerable Groups (Scotland) Act 2007
- Apprenticeships, Skills, Children and Learning Act 2009
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended)
- Sexual Offences Act 2003
- Sexual Offences (Scotland) Act 2009
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- The Equality Act 2010
- Immigration, Asylum and Nationality Act 2006
- The Human Rights Act 1998
- Police Act 1997 Part V
- Criminal Justice & Court Services Act 2000
- The Care Act 2015
- Working Together to Safeguard Children 2018
- Counter Terrorism Act 2015
- General Data Protection Regulations (GDPR)
- Data Protection Act 2018
- Social Services and Wellbeing (Wales) Act 2014
- Working Together to Safeguard People (Welsh Govt) 2017
- The Protection of Children Act 1999
- Criminal Justice and Court Services Act 2000
- Working Together to Safeguard Children, 2015
- Keeping Children Safe in Education, 2015
- Well-being of Future Generations (Wales) Act 2015
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- All-Wales Child Protection Procedures

6. Introduction

This policy sets a framework for the expected standard of behaviour. We are Digital (WAD) is committed to ensuring that a safe and suitable environment is provided for all users of our services especially those who are considered adults at risk of harm, abuse and neglect as well children. We also look to protect our employees, customers, and sub contractors.

Our safeguarding policy and associated policies are based on the following principles:

- The welfare of children, young people and vulnerable adults is the primary concern;

- All children, young people and vulnerable adults have the right to protection from abuse;
- It is the responsibility of experts to determine if abuse has taken place, but it is everyone's responsibility to report any concerns using the appropriate procedures outlined in this policy;
- All incidents of suspicious practice and allegations must be taken seriously and responded to swiftly and appropriately;
- Confidentiality must be upheld in line with the Data Protection Act 2018, GDPR and the Human Rights Act 1998.

6.1 Purpose

The aim of this policy is to:

- give a clear statement of We are Digital's approach to Safeguarding
- clarify the roles and responsibilities of all employees, partners and subcontractors
- provide the principle upon which our processes and procedures are built
- signpost to the associated policies and procedures which support this aim
- be clear about how We are Digital will embed the principles of Safeguarding through their associated policies and procedures
- outline the associated support that will be available

6.2 Scope

This policy applies to:

- employees (individuals who work – or have applied to work for We are Digital either on a permanent, temporary, contractual or voluntary basis).
- Subcontractors and partners delivering who are in receipt of and/or are providing We are Digital services on our behalf.
- We are Digital service-users, customers, learners, trainees and apprentices.
- external stakeholders and visitors who may have access to service users or data

Failure to adhere to this and associated policies, will lead to disciplinary proceedings up to and including dismissal.

NB: When working on external sites/establishments all employees need to make themselves familiar with any policies relevant to the specific working location.

Some employee groups may have contractual requirements to undertake training, or work to standards as stated within local Safeguarding Policies and Procedures. We are Digital will ensure that those employees who are subject to these additional requirements are aware of these responsibilities.

6.3 Monitoring

This policy provides overarching framework, but it is recognised that specific service delivery may require additional guidelines and procedures. This policy will be reviewed annually, and all staff undergo annual mandatory training.

The policy will also be reviewed in the following circumstances:

- Changes in legislation and/or government guidance
- As a result of any other significant change or event.

7. Roles and Responsibilities

RACI	Role	Role Holder(s)	Key Responsibilities
Responsible	Process SME	Rebecca Clarke	<ul style="list-style-type: none"> Ensuring process document accurately reflects current practice Contributing to process changes and improvements, as and when identified
Accountable	Process Owner	Gemma Higham	<ul style="list-style-type: none"> Overall ownership and accountability for process definition and execution Leading change for improving the process Approval point for any changes/update to the process definition Ensuring that any changes are properly documented and communicated Ensuring that ongoing monitoring is in place and carried out
Consulted	Trainer Network and Quality Assurance Lead	Gemma Higham	<ul style="list-style-type: none"> Monitoring adherence to agreed process through periodic quality reviews
Informed	All Staff Subcontractors		<ul style="list-style-type: none"> Read and accept of document must be completed in HR system To be included in subcontractor paperwork

8. Instruction

What is Safeguarding?

Safeguarding is the promotion of the wellbeing of children, young people and vulnerable adults and the detection, referral and prevention of abuse.

What do we mean by “at risk” in Safeguarding terms?

A person becomes vulnerable of being harmed (whether it’s someone who uses our services or an employee) if they are at risk of harm from others.

An Adult at risk is someone 18 or over who: An adult is defined as vulnerable when they are in receipt of a ‘regulated activity’. This defined by the following 6 broad categories:

1. Providing health care
2. Providing personal care
3. Providing social work
4. Assistance with cash, bills and/or shopping
5. Assistance in the conduct of a person’s own affairs
6. Providing transportation of individuals where that transport is provided because of age, health or disability

They are unable to look after their own well-being, property, rights or other interests; and is at risk of harm (either from another person's behaviour or from their own behaviour); and have a disability, mental disorder, illness or physical or mental infirmity; these individuals are more vulnerable to being harmed than other adults.

8.1 Safeguarding Children

All children and young people under the age of 18 are deemed to be at risk of harm or abuse, with some being more vulnerable than others.

We are Digital believes every child regardless of gender, ethnicity, disability, sexuality or religion deserves to be comfortable and secure in their activities. Their carers, family or friends also need to feel sure that the people in charge of these activities are trustworthy, responsible and will do everything they can to keep the child safe from harm.

The Children Act and the Definition of a 'Child'

In September 2003 the UK Government published the Every Child Matters Green paper alongside its formal response to the Victoria Climbié Inquiry Report which had made many recommendations about the needs for change in the way local authorities and other agencies should be organised to deal adequately with children's services and in particular highlighted the lack of priority status given to safeguarding. The Green Paper proposed changes in policy and legislation in England to maximise opportunities and minimise risks for all children and their families, and the Children Act 2004 and the provisions therein came into force on 1 October 2005.

The key provisions in the Children Act 2004 include:

Section 11 - A specific duty to ensure that its functions are discharged having regard to the need to safeguard and promote the welfare of children. This requirement also extends to any other body providing services on behalf of We are Digital.

Sections 13-16 - A requirement to be represented on and participate in, Local Safeguarding Children's Boards (LSCB) to take a strategic overview with regards to Safeguarding and to monitor agencies adherence to the requirements of the Children's Act.

These duties relate to children from pre-birth to the age of 18. The fact that a child has become 16 years of age and is living independently, is in further education, is a member of the armed forces, is in hospital or detained within the secure estate does not change their status or entitlement to services or protection under the Children Act 2004. Where "children" are referred to in this policy it is inclusive of any child.

For the context of this policy when we refer to a 'child' we are referring to any person under the age of 18, as defined by The Children Act 1989. When we refer to 'children' they may also be more commonly known to us as pupils, learners, customers, clients, attendees, participants or carers; within this policy we shall use the term 'customer' or 'child/children' to describe this group.

Safeguarding in Wales – The Social Services and Well-Being (Wales) Act 2014, the Well-being of Future Generations Act 2015 and the Violence Against Women, Domestic Abuse and Sexual Violence Act 2015

The Social Services and Well-Being (Wales) 2014 Act came into full force on 6 April 2016. It repealed or dis-applied the pre-existing community care legislation in Wales.

The intention of the 2014 Act is to integrate social services to support people of all ages, and support people as part of families and communities – the “people” approach. It is intended to transform the way social services are delivered, primarily through promoting people’s independence to give them a stronger voice and control. It is expected that the integration and simplification of the law will provide greater consistency and clarity to people who use social services, their carers, local authority staff, their partner organisations, the court and the judiciary. The stated intention of the Act is to promote equality, improvements in the quality of services and the provision of information people receive. There is to be a shared focus on prevention and early intervention. The 2014 Act concentrates on delivering outcomes for individuals and improving the individual’s well-being. As part of that new scheme, new duties to report adults and children at risk were brought into being, as are the new Adult Protection and Support Orders.

New Safeguarding Adult Boards and Safeguarding Children Boards have been formed, the National Independent Safeguarding Board has been introduced and new duties were imposed to ensure co-operation between agencies. Safeguarding is intended to be improved by the implementation of these sections. Nothing within the Act is intended to undermine or detract from duties and powers in other legislative schemes which are designed to protect children and adults. We are Digital will work with all relevant Welsh Safeguarding Boards and any other relevant external agencies as appropriate.

The protective provisions of the Children Act 1989 remain in force and the remaining provisions of the Children Act 1989 co-exist with the Social Services and Well-Being (Wales) 2014 Act (NB – Part III of the Children Act 1989 no longer applies in Wales).

A child who is in need of protection under the Children Act 1989 may also be a child in need of care and support under Parts 3 and 4 of the Social Services and Well-being 2014 Act. Equally the duties and functions of Welsh social services authorities to all looked after and accommodated children are prescribed by Part 6 of the Social Services and Well-Being (Wales) 2014 Act.

In Wales strategic laws have been implemented which are intended to change the way Wales thinks as a Nation and to improve the well-being of the populace of Wales. The Well-being of Future Generations Act 2015 is now in force. It is intended that the 2015 Act will make the public bodies listed in the Act think more about the long term, work better with people and communities and each other, look to prevent problems and adopt a more joined-up approach. This will mean that public bodies must do what they do in a sustainable way. Public bodies when making decisions must take into account the impact they could have on people living their lives in Wales in the future. Hence when, for example, a local authority considers building new schools or recreation facilities or closing libraries, it must now consider not simply the immediate needs of the community it serves but its future needs. The intention is to ensure that the plans made by public bodies improve the future well-being of those who live in Wales.

How Wales responds to abuse and violence is legislated for in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. This Act does not alter the criminal law. However, the Act aims to improve the Public Sector response in Wales to abuse against women, and to improve arrangements to promote awareness of, and prevent, protect and support victims of gender-based violence, domestic abuse and sexual violence. It introduces a needs-based approach to developing strategies which aim to ensure strong strategic direction and strengthened accountability in relation to such acts through the appointment of a Ministerial Adviser whose role involves advising Welsh

Ministers and improving joint working amongst agencies across this sector. Joined up service provision is intended to ensure consistency and quality of service provision throughout Wales.

This new Welsh legislation, together with the Social Services and Well-Being (Wales) 2014 Act and the Well-being of Future Generations Act 2015, emphasises a shift in Wales towards meeting the well-being outcomes of individuals and improving the wellbeing of the nation as a whole. Whether in terms of the well-being of the individual or when looking at the populace as a whole, at the heart of well-being is the need to safeguard adults and children.

We are Digital also recognise the Welsh Government's national strategy ('Prosperity for All') and twelve well-being objectives ('Well-being Statement 2017'). Please see Appendix Two of this policy – 'Relevant Legislation Explained' for more details on legislation in England, Scotland and Wales.

8.2 Our Duty of Care and 'Protection'

We are Digital has a duty of care to safeguard all children and adults at risk involved in our services and provisions from harm. All children have a right to protection, and the needs of children who may be particularly vulnerable must be taken into account. We are Digital will ensure the safety and protection of all children and adults at risk involved in We are Digital through adherence to this policy.

'Protection' is a central part of safeguarding and promoting welfare. It is the process of protecting individuals identified as either suffering or at risk of suffering significant harm as a result of abuse or neglect. In this sense, 'protection' refers to the procedures that come into force when there is a particular concern or incident. Protection is a statutory responsibility. Early help and intervention helps to reduce the need for protection, but it is vital to have rigorous and clear procedures in place in case a problem arises. If a child or adult at risk suggests that they are being abused or if someone reports abuse or bad practice that could put a person's welfare at risk, these procedures must be understood and followed by everyone involved.

8.3 What is Abuse?

There are many different types of abuse and they all result in behaviour towards a person that deliberately or unintentionally cause harm. It is a violation of an individual's human and civil rights and in the worst cases can result in death.

Types of abuse:

- Physical
- Neglect
- Institutional
- Sexual
- Discriminatory
- Psychological
- Financial

We believe that it is always unacceptable for any child or adult at risk of harm, abuse and neglect to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of all children and adults, by a commitment to practice which protects them.

Please see Appendix One: Safeguarding – Types of Abuse (in this policy) for further guidance

For the context of this policy when we refer to “adult” they may also be more commonly known to us as learners, apprentices, customers, clients, attendees, participants or trainees; within this policy we shall use the term “customer” or “adult” to describe this group.

8.4 Our Commitment

To be considered trustworthy and responsible in keeping children and adults at risk of harm, safe from harm, abuse and neglect we will;

- avoid putting our employees or subcontractors in positions where abuse might be alleged, and to ensure that all employees and subcontractors know exactly what to do should abuse be suspected.
- enable all our employees and volunteers and those who work with us (including subcontractors) to make informed and confident decisions regarding safeguarding issues and take all suspicions and allegations of abuse seriously.
- recognise that anyone may become vulnerable at some stage in their life and that they may require extra support in the face of difficult situations such as ill health, bereavement, divorce, loss of income, or other challenges.
- ensure that all those involved in delivering our services and those receiving our services understand how to raise a concern and what to do
- We are Digital is committed to safeguarding and ensures that all staff and subcontractors understand that when working with children or adults at risk they are operating in a position of trust. That brings a certain amount of responsibility.
- We are Digital ensures that all members of staff and sub contractors have an understanding of their role that keeps both the child or adult at risk and employee safe.

8.5 Effective Safeguarding and Child Protection

Child Protection and the Safeguarding of Children and Vulnerable Adults is a statutory responsibility (more information is available in Appendix Two – Safeguarding – Relevant Legislation Explained).

Organisations should work together to safeguard children and be aware of the protective duties and responsibilities as outlined in all primary legislation (Children Act 1989 and Children Act 2004, Safeguarding of Vulnerable Groups Act 2006 etc.) and all other associated regulations and guidance as set out by the UK, Welsh and Scottish Governments.

The key elements to effective safeguarding and child protection are:

- Ensuring we practice safe recruitment in checking the suitability of employees and volunteers to work with children.
- Raising awareness of child-protection issues and equipping children with the skills needed to keep them safe.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting children who have been abused in accordance with his/her agreed child-protection plan.
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the potential in home contact with children, our employees are well placed to observe the outward signs of abuse.

We are Digital will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in their school whom they can approach if they are worried.

Our organisation operates in England, Scotland and Wales and we will take account of guidance issued by the Department for Education (England), Welsh Government and Scottish Government accordingly to:

- Ensure we have a designated senior person for safeguarding and child protection who has received appropriate training and support for this role.
- Ensure we have a nominated senior member of staff responsible for child protection.
- Ensure we follow the guidelines of all relevant local children's or adults safeguarding boards and liaise with both them and any relevant Multi-Agency Safeguarding Hub (MASH) and any other relevant safeguarding authority or external agency, be they in England, Scotland or Wales.
- Ensure every employee, Agency Worker and subcontractor and the Executive Board knows the name of the designated senior person responsible for child protection and their role.
- Ensure all employees and subcontractors understand their responsibilities in being alert to the signs of abuse and responsibility for sharing any concerns to the designated senior person responsible for child protection.
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child-protection matters including attendance at case conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely; separate from the main file of the child, and in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or subcontractor.

We are Digital employees will endeavour to support customers through:

- The content of the learning and our general engagement with the customer.
- The ethos of our provision which promotes a positive, supportive and secure environment and gives children a sense of being valued.
- Liaison with other agencies that support the Customer such as Children's Social Care, child and adult mental health services.

We recognise that:

- the welfare of our employees, children and adults at risk of harm, abuse and neglect is paramount
- all children, adults at risk of harm, abuse and neglect, regardless of age, disability, gender, race, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse

- Working in partnership with our employees, subcontractors, adults, children, their parents, carers and other agencies is essential in promoting their welfare.

8.6 Recruitment Procedures

We are Digital undertakes safe recruitment practices in all areas of the business. We adhere to the Disclosure and Barring Service Code of Practice and requires all employees who will work in eligible roles to complete a DBS/Disclosure Scotland check. Employees who work in roles outside of this eligibility will be required to complete a Basic check. These practices are aligned to the specific legislative, statutory and best practice guidelines for each individual business area.

8.7 Induction and Training

All new employees and agency workers will receive an induction that covers their responsibilities as employees / agency workers and as part of their job roles, the company's responsibilities to them in respect of all aspects of their employment, training, development, equal treatment, health and safety and their responsibility to others, including safeguarding.

- Safeguarding training is mandatory for all staff and takes place annually. It forms part of We are Digital's formal training programme which is evaluated, monitored and kept under review.
- Safeguarding training and acceptance of We are Digital's terms and conditions which layout the expectation and requirements are mandatory for all subcontractors delivering on behalf of We are Digital.
- We are Digital employees, agency workers and subcontractors will also have relevant health and safety procedures detailed to them as part of their induction.
- Some employee groups may have contractual requirements to undertake training, or work to standards as stated within local Safeguarding Policies and Procedures. We are Digital will ensure that those employees / agency workers / sub contractors who are subject to these additional requirements are aware of these responsibilities

8.8 Anti-Radicalisation and Extremism; Adhering to the Prevent Duty

At We are Digital we are committed to safeguarding the welfare of all our staff and customers. We recognise that as part of this process, safeguarding against radicalisation is important; we will work alongside other professional bodies and agencies to ensure that our staff and customers are safe from harm. Our policy regarding anti-radicalisation and commitment to the Prevent Duty can be found in the PREVENT Anti-Radicalisation and Extremism Policy.

8.9 Communication to Customers

We are Digital takes a whole organisation approach to safeguarding. This policy and associated documents are available to all learners, apprentices, customers and service-users. They are communicated at the induction stage of their engagement with We are Digital. All stakeholders are made aware of the procedure for reporting safeguarding concerns at the induction stage through literature and information provided.

8.10 Ensuring a Safe Environment

We are Digital is committed to ensuring that a safe and suitable environment is provided for all users of our services, and employees or sub contractors working in those environments. We will ensure that a comprehensive risk assessment is undertaken by a competent person. We would ensure that

sub contractors understand the need to conduct a dynamic risk assessment for all in home appointments. The assessment will determine the potential risks to both customers, sub contractors and staff. Risk Assessments will be reviewed on an annual basis and in response to any incident.

8.11 Support for Employees

We are Digital recognises that working with situations that involve the abuse of a child or vulnerable adult can be very upsetting and stressful for employees. Employees may also feel their personal safety may be put at risk or they have been placed under undue stress. Any concerns raised will be dealt with in a sensitive way. Counselling outside the workplace is available through the Employee Assistance Programme (EAP).

8.12 Protection of Employees Who Report or Allege Abuse

Reporting abuse, whether or not it is found to be correct, is never an easy option. We are Digital's Whistleblowing Policy sets out support and protection for staff who report abuse in the workplace.

8.13 Dealing with Suspicions or Allegations of Abuse Made Against We are Digital Employees or Subcontractors

We are Digital is committed to investigating allegations made against employees or subcontractors. Any action taken will be in line with statutory guidance and with regard to the following internal guides and procedures:

- Disciplinary and Grievance Procedure
- Subcontractor Contract Agreement Code of Conduct Procedure

If serious or suspected criminal offences appear to have been committed the allegation will be passed to a Director for further action including the involvement of other organisations/adults responsible for the care of the child/vulnerable adult, including notification of the police.

We are Digital understands its obligations under the Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012) to refer information to the DBS in cases where a person is dismissed or removed from working with children or adults at risk of harm, abuse and neglect (or would have been if the person had not left the business or resigned).

We are Digital is aware of the legislative and statutory guidance, local protocols and best practise in relation to managing allegations against staff or subcontractors who work with children and adult at risk of harm, abuse and neglect.

8.14 Managing Information and Confidentiality

All incidents or concerns will be handled in a sensitive manner; We are Digital will maintain confidentiality, with others informed on a "need to know" basis only. Safeguarding training will include guidelines for all employees when discussing the rights of confidentiality and safeguarding.

Any data, whether it be of a sensitive nature or otherwise will be handled in line with the General Data Protection Regulations (GDPR). See also the following Information Security Policies:

- IT Security and Social Media Policy
- Company Privacy Notice

Where the concern is appropriate to be disclosed to the client i.e. Housing Association; care and consideration will be given to protect the confidentiality and the contact will be made through the organisations own safeguarding team.

8.15 Photography, Videos and Other Creative Arts

Many activities of We are Digital will involve the taking of images which will often be used for publicity and/or to celebrate achievement. Employees need to be aware of the potential for these activities to be misused and should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of children for publicity purposes will require the age appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. It is recommended that when using a photograph, the following guidance should be followed:

- Ensure appropriate explicit consent has been granted (using a media consent form)
- If the photograph is used, avoid naming the child
- If the child is named, avoid using their photograph
- Establish whether the image needs to be retained for further use,
- Ensure appropriate measures are in place to securely store images, and are only used by those authorised to do so

8.16 Responsibilities

Designated Safeguarding and Prevent Lead will be the individual holding the post of Office and HR Lead.

This person:

- is level 3 trained and they have a responsibility to keep updated on Safeguarding issues.
- has knowledge of reporting procedures for incidents should they occur.
- be the point of contact for advice and support if external reporting of a Safeguarding issue occurs.
- will look to form links to Local Authority Safeguarding Boards and ensure We are Digital's reporting procedures are aligned
- will support with on-going CPD training for Safeguarding and Prevent representatives

Contact details: 03333 444019 Opt 6 is the main number for Safeguarding concerns and reporting incidents or HR@we-are-digital.co.uk for emails.

It is not the role of the Designated Safeguarding and Prevent Lead, or We are Digital, to decide whether abuse has taken place or not. The responsibility of the Designated Safeguarding and Prevent Lead is to ensure that concerns are shared, and appropriate action taken.

8.17 Appendix One: Safeguarding – Types of Abuse

This aim of this appendix is to provide guidance on types of abuse, it is not an exhaustive list. Some of the content here is duplicated from the main body of the policy here for your information.

Discriminatory Abuse:

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person's age, gender, disability, sexual orientation, race, cultural background or religion.

Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime. Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, racial, religion or disability; or occurs in a domestic violence situation; or perceived as a Hate Crime: the abuse will be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas, Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

Other types of Abuse which could be considered Discriminatory:

Hate Crimes: any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.

Ageism: discrimination based on age, especially against the elderly.

Gender Discrimination: is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives and status greater than those of the inferior sex.

Homophobia: discrimination against (fear or dislike of) homosexual people and homosexuality

Transgender Discrimination: discrimination against people who are transgender

Religious Intolerance: is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.

Racism: the belief that all members of each race possess characteristics or abilities specific to that race, especially so as to distinguish it as inferior or superior to another race or races.

Disablism: discriminatory, oppressive or abusive behaviour arising from the belief that disabled people are inferior to others.

Physical Abuse

Physical Abuse is the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, pinching, burning, force-feeding, misuse of medication or the withholding of medication or treatment, unwarranted or inappropriate restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction, rough handling causing injury or any injury not fully explained by the history given.

Signs and symptoms of Physical Abuse can include:

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries
- unexplained lacerations or abrasions to the mouth, lips, gums, eyes, external genitalia
- recoiling from physical contact or flinching
- malnutrition – rapid or continuous weight loss, insufficient supply of food on premises, dehydration, complaints of hunger
- lack of personal care, inadequate or inappropriate clothing, inadequate heating
- untreated medical problems
- unmanaged urinary / faecal incontinence
- signs of medication misuse such as drowsiness
- use of furniture and other equipment to restrict movement

Other types of Abuse which could be considered:

Domestic Violence: any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners, or family members regardless of gender or sexuality;

Forced Marriage: is a marriage conducted without the valid consent of one or both parties where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973;

‘Honour’ Based Violence: is an incident or crime carried out to protect or defend the honour or ‘izzat’ of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and / or collusion from the family and / or community. Honour based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy / abortion and in some cases murder. The family may perceive that the person has acted inappropriately and dishonoured the family and community. Consequently, the

violence carried out is to punish them for this. For more information about honour based violence visit Karma Nirvana's website www.karmanirvana.org.uk

Environmental Abuse: includes depriving someone of their liberty, sustained restrictions on a person's freedom of movement as a result of the physical environment the person is in, culture of the environment or institution. It can also mean a child living without expressions of love, living in unsuitable / unclean accommodation.

Sexual Abuse

Sexual abuse is the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent to, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, abuser touching the victim's body for their own gratification, indecent exposure, non-contact abuse (pornography), and sexual harassment, causing or inciting a person to engage in sexual activity without their consent. The use of social media and the internet has introduced 'cyber' sexual abuse such as 'sexting' and unauthorised sharing of sexual images.

Signs and symptoms of sexual abuse can include:

- full or partial disclosure or hints of sexual abuse
- signs of depression, stress
- recoiling from physical contact
- unusual difficulty in walking and sitting
- sexually-transmitted disease, urinary tract / vaginal infections
- love bites, bruises or finger marks on thighs or arms
- significant change in sexual behaviour, language or outlook
- fear of males or females
- pregnancy in a person who is not able to consent
- Worries over social media content and sharing of personal content (see Cyber Abuse)

Other types of Abuse which could be considered Sexual:

Female Genital Mutilation: FGM (more commonly known as female circumcision) is a practice with roots in religious communities of Asia, Africa and the Middle East. It is against the law in the United Kingdom.

Victims of FGM are likely to come from a community that is known to practise it but the children or young persons at risk may not yet be aware of the practice or that it may be conducted on them – sensitivity should be shown towards the child or young person if you have to approach the subject. If any We are Digital staff encounter this practice they should contact the Designated Safeguarding Lead immediately.

Sexual Exploitation: Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts and relationships where the vulnerable person receives 'something' (e.g. food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them performing, and/or others performing on them, sexual activities.

Psychological / Emotional Abuse

Psychological or emotional abuse is action or neglect by a person which impairs the psychological wellbeing of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. People who use social media can be at risk from being humiliated or abused 'on-line'

Signs and symptoms of Psychological/Emotional abuse can include:

- fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- ambivalence to carer
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- threats or intimidation, bullying or shouting
- significant pressure on a person to commit criminal acts
- threat to abandon person or put them "away"
- promises which are not kept
- few visitors, phone calls or outings
- locking the person in at home, or in a car
- significant community pressure for example anti-social behaviour
- Withdrawing from on-line or reality social groups (see Cyber Abuse)

Other types of Abuse which could be considered Psychological:

Anti-Social Behaviour: acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.

Discriminatory Abuse: as described above

Online Abuse: the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and wellbeing or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access. Threats can come through content, contact and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging and websites. Signs and symptoms can include spending long periods of time online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming.

Financial or Material Abuse

Financial abuse is the misappropriation of an individual's funds, benefits, savings, assets etc. or any other action that is against the person's best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions or benefits.

Signs and symptoms of Financial/Material Abuse can include:

- unusual or inappropriate bank activity
- a Power of Attorney obtained when a person is unable to comprehend

- recent change of deeds or title of house
- person lacks belongings or services which they can clearly afford
- recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- carer asks only financial questions of the worker, does not ask questions about care; withholding money
- person managing financial affairs is evasive or uncooperative.

Neglect and Acts of Omission

Neglect is the deliberate withholding OR unintentional failure to provide appropriate and adequate care and support. Section 44 Mental Capacity Act 2005 states “Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly ill-treat that person or if they wilfully neglect that person.” It does not matter whether the behaviour was likely to cause, or caused, harm or danger to the victim's health. Wilful neglect usually means that a person has deliberately failed to carry out an act they knew they had a duty to do.

Signs and Symptoms of Neglect and Acts of Omission can include:

- physical condition of the person is poor
- unexplained or untreated deterioration in health and wellbeing, including not seeking appropriate medical attention
- inadequate heating or lighting
- poor personal hygiene
- malnutrition – loss of weight
- dehydration
- demanding food or drink
- pressure sores
- inconsistent or reluctant contact with health or social agencies
- lack of social support and/or refusal to arrange access to callers / visitors
- inappropriate, old or shabby clothing, or being kept in night clothes during the day
- sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living
- accumulation of medication, or prescriptions not being collected from pharmacy
- increased number of incidents or accidents e.g. falls or physical altercations with others, which appear to have resulted from a lack of supervision both inside and outside of the home environment.

Extremism and Radicalisation

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There is a recognised threat from extremist groups attempting to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

We are Digital values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Individuals have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which

freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. We are Digital is clear on its legislative and moral duty to view exploitation and radicalisation as a safeguarding concern and act accordingly.

Signs and Symptoms of Extremism or Radicalisation can include:

- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour;
- experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis.

8.18 Appendix Two: Safeguarding – Relevant Legislation Explained

Safeguarding Vulnerable Groups Act 2006 & Protection of Freedoms Act 2012

In response to recommendation 19 of the Bichard Inquiry Report into child protection procedures following the Soham murders, new arrangements for people whose jobs and voluntary work bring them into contact with children and vulnerable adults (previously referred to as the Vetting and Barring Scheme) was phased in from October 2009 under the Safeguarding Vulnerable Groups Act.

During 2011 the Vetting and Barring Scheme was reviewed and one the key recommendations of the review were to abolish the registration scheme as recommended under the SVGA and to form a new body combining the criminal record checking services and the barring services together. Other key recommendations were to scale back eligibility enhanced criminal records checks. Following on from that in 2012 the ISA and CRB merged under the provisions of the Protection of Freedoms Act (2012) to form a new body called the Disclosure and Barring Service (DBS).

The DBS are responsible for:

- processing requests for criminal records checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list
- placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland

The Disclosure and Barring Service (DBS) issues criminal record certificates for specific positions, professions, employment, offices, works and licences included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

Types of DBS check available

Standard checks – To be eligible for a standard level DBS check, the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

Enhanced checks – To be eligible for an enhanced level DBS check, the position must be included in both the ROA Exceptions Order and in the Police Act 1997 (Criminal Records) Regulations.

Enhanced checks with children’s and/or adult’s barred list check(s) – To be eligible to request a check of the children’s or adult’s barred lists, the position must be eligible for an enhanced level DBS check as above and be specifically listed in the Police Act 1997 (Criminal Records) Regulations as able to check the barred list(s).

The Rehabilitation of Offenders Act (1974)

Anyone who has been convicted of a criminal offence, and received a sentence of not more than 2.5 years in prison, benefits as a result of the Act, if they are not convicted again during a specified period otherwise known as the 'rehabilitation period'. The length of this period depends on the sentence given for the original offence and runs from the date of the conviction. If the person does not re-offend during this rehabilitation period, they become a 'rehabilitated person', and their conviction becomes 'spent'.

Custodial sentences of more than 2.5 years never become 'spent'. There are exceptions to this Act. Occupations with duties involving “substantial, unsupervised access on a sustained or regular basis” to children and/ or vulnerable adults, are excepted from the Act. Application for work in such regulated positions requires full declaration and a subsequent disclosure check to identify spent and unspent convictions. Full details of all excepted occupations are noted in:

- The Rehabilitation of Offenders Act 1974 (Exceptions Order) 1975)
- The Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (No2) Order 2001

It must be stressed that We are Digital is committed to combating social exclusion and is in no way mandating or encouraging the exclusion of individuals purely because they have an unspent criminal conviction. While some individuals are likely to be unsuitable because of the nature and seriousness of their offences, there are no blanket bans. Rather, the best way to determine whether an individual is a risk is by discussing their offences and their attitudes to those offences with them. Decisions will not be made without giving individuals the opportunity to discuss their offences.

Protection of Vulnerable Groups (Scotland) Act 2007 (PVG)

A separate but aligned scheme has been set up in Scotland under the Protection of Vulnerable Groups (Scotland) Act 2007. Anyone included on a Barred List in Scotland will also be barred from working with children and vulnerable adults across the UK.

The Scottish scheme dovetails with the scheme established by the Safeguarding Vulnerable Groups Act 2006 for England, Wales and Northern Ireland. The UK Government and Scottish Government are seeking to avoid cross-border loopholes but recognise the need for distinct provision in each jurisdiction. <http://www.scotland.gov.uk/Publications/2007/11/01111737/2>

Implementation in Scotland is building on experience of operating the Protection of Children (Scotland) Act 2003 ("the 2003 Act") and existing disclosure arrangements. A distinct Scottish scheme also allows more flexibility in responding to Scottish circumstances and priorities and ensures appropriate accountability to the Scottish Parliament.

The Police Act 1997

This act contained the provision to set up the Criminal Records Bureau for England and Wales.

Under this act it is a criminal offence for an employer to:

- Not check an employee working with children or vulnerable adults.
- Give a job to someone who is inappropriate to work with children or vulnerable adults when they know this to be case.

The Protection of Children Act 1999

Under this act, childcare organisations (defined as those that are ‘concerned with the provision of accommodation, social services or health care services to children or the supervision of children’) must make use of the Disclosure Service in their recruitment and reporting processes and urges other organisations working with children to also do so.

Criminal Justice and Court Services Act 2000

This act covers Disclosures and child protection issues. It contains the list of convictions that bar offenders from working with children in ‘regulated positions’.

These types of ‘regulated positions’ are defined in this act and include:

- Any employment in schools, children’s homes, day care premises where children are present.
- Caring for, training, supervising, or being in sole charge of children
- Unsupervised contact with children.
- Other positions which give the kind of access or influence which could put children at risk if held by a disqualified person (e.g. management committee members).

Care Standards Act 2000

A CRB disclosure is required for most roles in organisations providing care or health services regulated under this act. This act also sets out the Protection of Vulnerable Adults scheme. (NB: CRB has now been replaced by DS/DBS).

The POVA or Protection of Vulnerable Adults scheme was launched in 2004 by the Department of Health and the National Assembly for Wales.

The Children Act 1989

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria on which to rely when judging what constitutes significant harm but consideration should be given to the following:

- The severity of ill-treatment which may include the degree and extent of physical harm, including, for example, impairment suffered from seeing or hearing ill-treatment of another
- The duration and frequency of abuse and neglect.
- The extent of premeditation.

Child abuse and neglect is a generic term encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child’s health or development. Children may be abused or neglected through the infliction of harm,

or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting by those known to them or, more rarely, by a stranger.

To understand and establish significant harm, it is necessary to consider:

- the family context
- the child's development within the context of their family and wider social and cultural environment
- any special needs, such as a medical condition, communication difficulty or disability that may affect the child's development and care within the family
- the nature of harm, in terms of ill-treatment or failure to provide adequate care
- the impact of the child's health and development
- the adequacy of parental care

It is important always to take account of the child's reactions, and his or her perceptions, according to the child's age and understanding.

Children's Act 2004

The Children's Act 2004 aims to improve and integrate children's services, promote early intervention, safeguard and promote children's well-being, provide strong leadership and bring together different professionals in multi-disciplinary teams in order to achieve positive outcomes for children and their families. Local authorities are given a lead role in securing the co-operation of partners in setting up children's trust arrangements and the Act allows some flexibility in how these are structured and organised.

The Act takes a child-centred approach and includes universal as well as targeted and specialist services. Part of the aim of integration of services, plans and information is to enable children's needs to be identified early to allow timely and appropriate intervention before needs become more acute.

Local authorities are now specifically required to establish co-operative partnership working arrangements to improve the well-being of children. Partnerships will range from joint commissioning, to single service partnerships, to the full integration of social care, education and some health services. County councils and single-tier authorities are the designated Children's Services Authority (CSA) with responsibility for ensuring that the Act is implemented locally. The main relevant measures of the Act include:

Section 10 - A duty to co-operate to improve the well-being of children

This Section of the Act, gives local children's services authorities a lead role in securing the co-operation of partners in setting up arrangements to improve the well being of children in the authority's area in relation to the five outcomes as indicated in the introduction.

The relevant partners as specified in the Act have a duty to co-operate with the children's services authority in the making of any such arrangements to improve children's well-being. These partners include the police, strategic health authorities and PCT's for the area and district and borough councils. The concept of well-being covers physical and mental health and emotional well-being, protection from harm and neglect, education training and recreation, contribution to society and social and economic well-being. Arrangements for co-operation must take account of the importance of parents and carers in improving the wellbeing of children.

Section 11 - A duty to safeguard and promote the welfare of children and young adults

This duty requires all agencies with responsibilities towards children and young adults and their functions with regard to the need to safeguard and promote the welfare of children. They must also ensure that anybody providing services on their behalf must do the same. The purpose of this duty is that agencies give appropriate priority to safeguarding children and share concerns at an early stage to encourage preventative action. The organisations are, in England: children's services authorities, district councils, Strategic Health Authorities, PCTs, NHS trusts, police, probation, youth offending teams, governors of prisons or secure training centres.

Working Together to Safeguard Children, 2015

This applies to England only Working Together sets out how organisations and individuals should work together to safeguard and promote the welfare of children in accordance with the Children Act 1989 and the Children Act 2004. It is important that all practitioners working to safeguard children understand fully their responsibilities and duties as set out in primary legislation and associated regulations and guidance

Keeping Children Safe in Education, 2015

This guidance replaces Safeguarding Children and Safer Recruitment in Education (December 2006). This is statutory guidance from the Department for Education issued under Section 175, Education Act 2002, the Education (Independent School Standards) (England) Regulations 2010 as amended by SI 2012/2962 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. The procedures for Managing Allegations against staff are also contained within this guidance.

Social Services and Well-being (Wales) Act 2014

This applies to Wales only This Act came into force on 6th April 2016. The Act provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales. <https://socialcare.wales/hub/sswbact>

All Wales Child Protection Procedures Review Group

The All Wales Child Protection Procedures are an essential part of safeguarding children and promoting their welfare. The common standards they provide guide and inform child protection practice in each of the Local and Regional Safeguarding Children Boards across Wales. They outline the framework for determining how individual child protection referrals, actions and plans are made and carried out. <https://socialcare.wales/hub/sswbact>

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 makes public bodies listed in the Act think more long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. The Act makes those bodies listed, carry out their tasks in a sustainable way. The Act also establishes Public Services Boards (PSBs) for each local authority area in Wales. Each PSB must improve the economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals. Furthermore, the Act established a Future Generations Commissioner for Wales, whose role is to act as a guardian for the interests of future generations in Wales, and to support the public bodies in the Act to work towards the well-being goals. <http://gov.wales/topics/people-and-communities/people/future-generations-act>

Prosperity for all – the National Strategy

The Welsh Government's well-being objectives (2017) This document sets out the aims of the Welsh government and provides clarity for partners about the changes the Welsh Government want to make in Wales. It also details how the Welsh Government want government and delivery partners to be part of a new approach to delivering priorities. There are twelve well-being objectives (these replace the initial objectives set out in November 2016). These objectives are integral to the Welsh Government's strategy, set out the areas that the Welsh Government can make the greatest contribution to the goals and provide the basis for strong partnerships with others. Prosperity for all – the national strategy <http://gov.wales/programmeforgovernment>

8.19 Appendix 3 - Behaviour Code for Adults Working with Children or Vulnerable Adults

When working with or for children, young people and vulnerable adults, you are acting in a position of trust. You are likely to be seen as a role model and must act appropriately.

Responsibilities

You are responsible for:

- prioritising the welfare of children, young people and vulnerable adults
- providing a safe environment for children, young people and vulnerable adults.
- having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following We are Digital principles, policies and procedures
- staying within the law at all times
- modelling good behaviour for children, young people and vulnerable adults to follow
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to the Designated Safeguarding and Prevent Lead
- reporting all allegations/suspicions of abuse following our reporting procedures. This includes abusive behaviour being displayed by an adult or child and directed at anybody of any age.

Rights

You should:

- treat children, young people and vulnerable adults fairly and without prejudice or discrimination
- understand that children, young people and vulnerable adults are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships

You should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid favouritism
- be patient with others

- use special caution when you are discussing sensitive issues with children, young people or vulnerable adults
- ensure your contact with children, young people and vulnerable adults is appropriate and relevant to the work of the project you are involved in
- ensure that whenever possible, there is more than one adult present during activities with children, young people and vulnerable adults.
- If a child, young person or vulnerable adult specifically asks for or needs some private time with you, ensure other staff or volunteers know where you and the individual are.

Respect

You should:

- listen to and respect children, young people and vulnerable adults at all times
- seriously, actively involving them in planning activities wherever possible
- In some cases it may be necessary to break confidentiality in order to follow child protection procedures; if this is the case it is important to explain this to the child or young person at the earliest opportunity.

Unacceptable Behaviour

When working with children, young people and vulnerable adults, you must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- develop inappropriate relationships with children, young people and vulnerable adults
- make inappropriate promises to children, young people and vulnerable adults
- engage in behaviour that is in any way abusive. This includes having any form of sexual contact with a child, young person or vulnerable adult.
- let children, young people and vulnerable adults have your personal contact details (mobile number, email or address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children, young people and vulnerable adults
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children, young people and vulnerable adults.

9. Quality Control Log

No	Risk/Issue	Control	Control in Place Y/N
1	Multiple handoffs	Central point of contact	Y

10. Glossary

Term	Description