



Children and Young People's Team

How To Develop
Child Protection
Policies & Procedures:
A Step-by-Step Guide for
Community Groups



About Action in rural Sussex

Action in rural Sussex (formerly called Sussex Rural Community Council) is a registered charity formed in 1931 to serve rural communities. Our major role is to identify problems and respond to the needs of rural communities – providing practical support and helping villages in Sussex remain vibrant living and working places. Action in rural Sussex works from a community development approach helping to support and build active and sustainable communities. Our activities are wide-ranging and include: enterprise, training, housing, transport and community health and care support.

Action in rural Sussex is committed to working on the issues that face children and young people in the communities we serve. We do this through our core work of giving advice to local communities, development work with specific communities across the two counties, and operating services that are of benefit or aimed at children and young people that live rurally. These include:

- **Children's Outreach Phone and Email Support Service (COPES)**, offering confidential support and information to children and parents as well as outreach family workers and play events.
- **The Your Bus Your Call Healthy Living Centre Project**, a mobile youth resource and helpline service.
- **The East Sussex Project** which supports targeted projects for young people in rural Wealden and Rother, funded from the Transforming Youth Work Fund.

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About the Local Network Fund

The Local Network Fund provides grants between £250 and £7,000 to small locally managed voluntary, community, or self-help groups to run projects or activities with disadvantaged children or young people aged 0-19 or their parents/carers.

Applications are assessed on a rolling basis. In order to receive an application form and grant guidelines, ring the national call centre: **0845 1130161**.

Action in rural Sussex is the local administrator for the Local Network Fund across the whole of East Sussex, West Sussex, Brighton and Hove. If you have questions about the Fund or if you have questions about your application, please call the LNF grants officer on 01273 473422.

All projects funded by the Local Network Fund must have a child protection policy and associated procedures that are specific to your group.

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This guide is available electronically at www.ruralsussex.org.uk under the Children and Young People's Team and Local Network Fund pages.

If you would like additional paper versions, please contact claire.reynolds@ruralsussex.org.uk or 01274 407305

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Throughout this guide, the Local Network Fund logo appears next to any steps that are essential for Local Network Fund supported groups. In other words, your group will not be able to receive funding from the Local Network Fund unless your policies and procedures include these essential steps.

Introduction ¹

Children have a right to be safe and happy in their activities. Parents and carers have a right to believe that the groups to which they entrust their children are safe. All groups therefore have a duty to care for the children for whom they provide activities or services.

If you run a group that provides activities for children, you are probably already taking precautions to ensure their safety and enjoyment. A set of thorough child protection policies and procedures will allow your group to formally recognise these efforts and can be a critical element to building a safe and comfortable environment. You can think of your group's child protection policies and procedures like a fire extinguisher—although you hope you will never have to use them, you should always know how to find and use them.

This guide is intended for community groups who do not currently have a child protection policy or for those groups who would like to update their existing policies and procedures. It is a step-by-step guide that takes you through the policies and procedures that your group needs. Note that the steps should be seen as a guide and that you may wish to add additional policies and procedures that suit your group's activities and needs.²

1 This guide is largely based on guidance from the Local Network Fund Working Group on Child Protection published in November 2002.

2 This guidance has been produced by Action in rural Sussex to assist groups in writing and implementing appropriate child protection policies and procedures. The guidance contained in this document is general, and any group using this guide is responsible for writing and implementing a rigorous policy that suits their work. Action in rural Sussex accepts no legal responsibility for policies that are written or followed as a result of consulting this guide.

Section 1:

Child Protection Policy Statement

To begin the process, you should write a basic child protection policy statement that lays out your group's basic commitment to child protection on just one sheet of paper. The policy statement provides basic information about child protection in your group including whose responsibility child protection is, who you should talk to if you suspect abuse, and what procedures will be put in place to protect children and young people.

Section 2:

Associated Procedures

Once you have written your policy statement, you should next consider the procedures that your group needs. For many groups, some of these procedures may already be in place. This is your chance to pull them together so people can find them easily. In this guide, there are eight types of procedures that your group may consider writing:

- | | | |
|---|--|---|
| 1 | Identifying types of abuse and how to recognise them | |
| 2 | Guidelines on how to respond to abuse or suspicions of abuse |  |
| 3 | Confidential records of concern |  |
| 4 | Contact names and details for other agencies and resources | |
| 5 | Safe recruitment procedures |  |
| 6 | Requirements for staff including training, monitoring, and supervision |  |
| 7 | Code of behaviour |  |
| 8 | Complaints procedure | |



At the end of this process, your group will have a simple policy statement that sets out your group's commitment to child protection together with the associated procedures that will put this commitment into operation.

Developing child protection policies and procedures is your group's chance to consider serious issues that affect staff, volunteers, parents, carers, children and young people. As agreed in Article 12 of the United Nations Convention on the Rights of the Child, children have a right to express views on all matters of concern to them and to have those views taken seriously. For these reasons, it is important that, whenever possible, **everyone is consulted** during the development or revision of your group's policies and procedures. With everyone's input, your group will also be able to ensure that the policies and procedures are workable.

Keep in mind that policies and procedures are useless if they remain only on paper. Your group should **put your policies and procedures into action** by ensuring that they are all implemented. This may include training, maintaining records,

updating policies and procedures, encouraging and supporting staff, and making sure everyone knows about the policies and procedures.

If your group does not have a child protection policies or procedures, don't worry – **support is available!** If you have any questions about this guidance, or if you want personal guidance, contact the case officers for Children and Young People at Action in rural Sussex, or, if you are applying for the Local Network Fund, the grants officer at Action in rural Sussex.








Finally, it is important to note that this guide will NOT provide a sample policy or template of procedures for you to adopt. We believe that it is very important that each group develops policies and procedures that are **tailored to your own activities and needs**. We do not recommend simply copying another group's policies. Instead, we hope that you will agree that the process of developing these policies and procedures is extremely valuable.

On the following page, we have provided a **checklist** that summarises the steps we describe in this publication.

Checklist for child protection policies and procedures³






Section 1:

Child Protection Policy Statement

- | | | | |
|---|----|--|--------------------------|
|  | 1 | Identify the name of the group and its objectives or activities | <input type="checkbox"/> |
|  | 2 | Address special scenarios if necessary | <input type="checkbox"/> |
| | 3 | Refer to principles, legislation and guidance that underpin the policy | <input type="checkbox"/> |
|  | 4 | State clearly the duty of paid workers and volunteers to child protection | <input type="checkbox"/> |
| | 5 | Clarify that the policies and procedures apply to all children/young people regardless of gender, ethnicity, disability, sexuality or religion | <input type="checkbox"/> |
|  | 6 | State that all activities will be planned and appropriate activities | <input type="checkbox"/> |
|  | 7 | State that children and young people will be informed of your policies and procedures as appropriate. | <input type="checkbox"/> |
|  | 8 | Include the nominated child protection representative's name and contact information | <input type="checkbox"/> |
| | 9 | Define when your policies and procedures will be reviewed | <input type="checkbox"/> |
|  | 10 | Refer to all associated procedures | <input type="checkbox"/> |

Section 2:

Associated Procedures

- | | | | |
|---|---|--|--------------------------|
| | 1 | Define the types of abuse and how to recognise them | <input type="checkbox"/> |
|  | 2 | Establish procedures for how to respond to abuse or suspicions of abuse | <input type="checkbox"/> |
|  | 3 | Maintain confidential records of concern | <input type="checkbox"/> |
| | 4 | Include contact names and details for other agencies and resources | <input type="checkbox"/> |
|  | 5 | Implement safe recruitment procedures | <input type="checkbox"/> |
|  | 6 | Outline requirements for staff including training, monitoring, and supervision | <input type="checkbox"/> |
|  | 7 | Outline a code of behaviour for staff and volunteers | <input type="checkbox"/> |
| | 8 | Outline a complaints procedure | <input type="checkbox"/> |

³ Reminder: Those items on this checklist with the Local Network Fund logo are mandatory for groups applying to the Fund.

Child protection policy statement

A child protection policy statement outlines the measures in place to protect children in the care of the group and the action that will be taken if any concerns arise. A policy statement on child protection is an integral part of any group working with children.

There are several reasons why it is important that your group has a policy statement:

- Everyone needs to be clear about what your group is trying to achieve, and how children and young people are protected within your work
- A policy statement makes it clear that safeguarding the welfare of children is a mandatory and integral activity for your group.
- It provides a structure for the procedures that the group will follow in order to maximise safety.

The basic policy statement may only be 1 or 2 sides of A4 paper. If you follow the next ten steps, you can easily draft a policy statement that can be reviewed by the other members of your group.



Step 1

Identify the name of the group

Briefly state the name and purpose or function of the group.



Step 2

Address special scenarios as necessary

Your policies and procedures need to be suited to your work. Some activities (e.g., trips away from home, working with children with disabilities) require additional consideration, and this should be noted in your child protection statement. In some

cases, groups might believe that they do not need a child protection policy because children do not come into contact with other adults by themselves (e.g., parent-toddler groups, capital only projects, child only groups). Whilst we understand the effort involved in producing a child protection policy, we strongly believe that **all groups benefit from a child protection policy**. Your group may also need to make special arrangements for projects that involve children and young people using the internet. The following areas of work/scenarios are all considered in **Appendix A**:

- a Trips away from home
- b Working with children with disabilities
- c Groups of parents and children
- d Working with older children
- e Children only groups
- f Capital only projects
- g Use of the internet

Step 3

Refer to principles, legislation and guidance that underpin the policy.

You should clarify in your policy statement what laws, professional or government guidance, or moral principles, you have used in developing the policy. **Appendix B** lists a number of laws and references on child protection.



Step 4

Recognise the group's responsibility in child protection

The policy statement should recognise the group's responsibility to the children and young people with whom it comes into contact. The policy should state clearly the duty of all those employed by or involved in the group in a voluntary capacity to prevent the physical, sexual or emotional abuse of all children with whom they come into contact.



Step 5

Clarify that the policies and procedures apply to all children

Make it clear that your group's child protection policies and procedures apply to all children and young people regardless of gender, ethnicity, disability, sexuality or religion.



Step 6

Designate a Nominated Child Protection Representative

It is essential that you choose someone within your group to be the nominated child protection representative. This representative is the first person children, staff, and volunteers should approach with concerns or suspicions of abuse. The representative is also responsible for ensuring that child protection policies and procedures are being implemented correctly. The *name and contact details of the nominated person should be stated in your child protection policy statement*. Training and roles for the representative are discussed further in the associated procedures on staffing requirements, but you may also want to state here that the representative will receive adequate training.



Step 7

State that all activities will be planned and appropriate

A key element of child protection is to have activities that are well thought out and appropriate for the group of children that you are working with. For example, you would not take a group of under 5s ten pin bowling. Your child protection policy should simply state that you are committed to carefully planning activities that are appropriate for the group of children and young people you work with.



Step 8

Require that all children and young people are informed of your policies and procedures as appropriate

Your group should inform children and young people about their rights, what they should do if they have concerns, and who the nominated child protection representative is. Your group should consider the most appropriate way of discussing child protection issues with children and young people. In most cases, handing out the policy would not be the best way to communicate the relevant information. Instead, the information can be conveyed through a talk with the children or young people, or through a leaflet, poster or notice board if the children can read. They need to know who to speak to if they are concerned about what is happening to themselves or others. They should be encouraged to raise concerns and/or use the group's complaints procedures.

Step 9

Define when your policies and procedures will be reviewed

Because groups are constantly changing, your policies and procedures should be updated on a regular basis. It is best practice to review such policies annually, for example at your Annual General Meeting (AGM). If your project is expected to finish in less than one year, you should review the policy and any issues of child protection at the end of your project.



Step 10

Refer to child protection procedures

In the next section, you will establish a number of child protection procedures. It is important to link these procedures explicitly to your policy statement. State that you will make sure that your policy is implemented by using your procedures and supporting documents.

Child protection procedures

There are a number of child protection procedures that can support the policy statement you have just set out. Each step in this section will guide you through writing procedures that will answer the following questions:

- 1 What are the types of abuse and how can they be recognised?
- 2 What should people do if they suspect abuse?
- 3 Where and how should records of concern be kept?
- 4 Who should people contact if they have questions about child protection?
- 5 How can your group safely recruit new workers and volunteers?
- 6 How can staff be best prepared to handle issues of child protection?
- 7 What is appropriate behaviour for workers and volunteers?
- 8 How will your group respond to complaints?

Step 1

Define the different types of abuse and how to recognise them

It is generally accepted that there are four main types of abuse. The following definitions are based on those from *Working Together to Safeguard Children* (see **Appendix B**).

Four Types of abuse

a Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. A person might do this because they enjoy or need the attention they get through having a sick child. Physical abuse can be caused through omission or the failure to act to protect.

b Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

c Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex or non-penetrative acts such as fondling. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Boys and girls can be sexually abused by males and/or females, by adults and by other young people. This includes people from all different walks of life.

d Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. It may involve a



parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It is often helpful to go one step beyond these definitions to outline the symptoms of abuse. In other words, how can one recognise a particular type of abuse? **Appendix C** includes a number of ways to recognise abuse.



Step 2

Define procedures to respond to abuse or suspected abuse

In this step, your written procedures need to set out what should be done if someone in your group suspects abuse. These procedures should apply to paid workers, volunteers, and young people. You can include the following:

- Step by step instructions for what someone should do if they suspect child abuse in any form. The first step is usually to approach the nominated child protection representative or an alternative person. It might be helpful to draw out a flow chart that follows different scenarios. An example of such a flow chart is included on the next page.
- Guidelines for how adults should respond to a report of abuse (see box on the right).
- A description of how your project will make referrals to social services.
- Directions on how to fill out a record of concern (see **Step 3** on page 9).
- Instructions on who to speak to about concerns if:
 - 1 the nominated person is away,
 - 2 they would prefer to speak to someone else,
 - or
 - 3 someone feels they are not being listened to.

Example Guidelines for responding to abuse or suspicion of abuse

DO

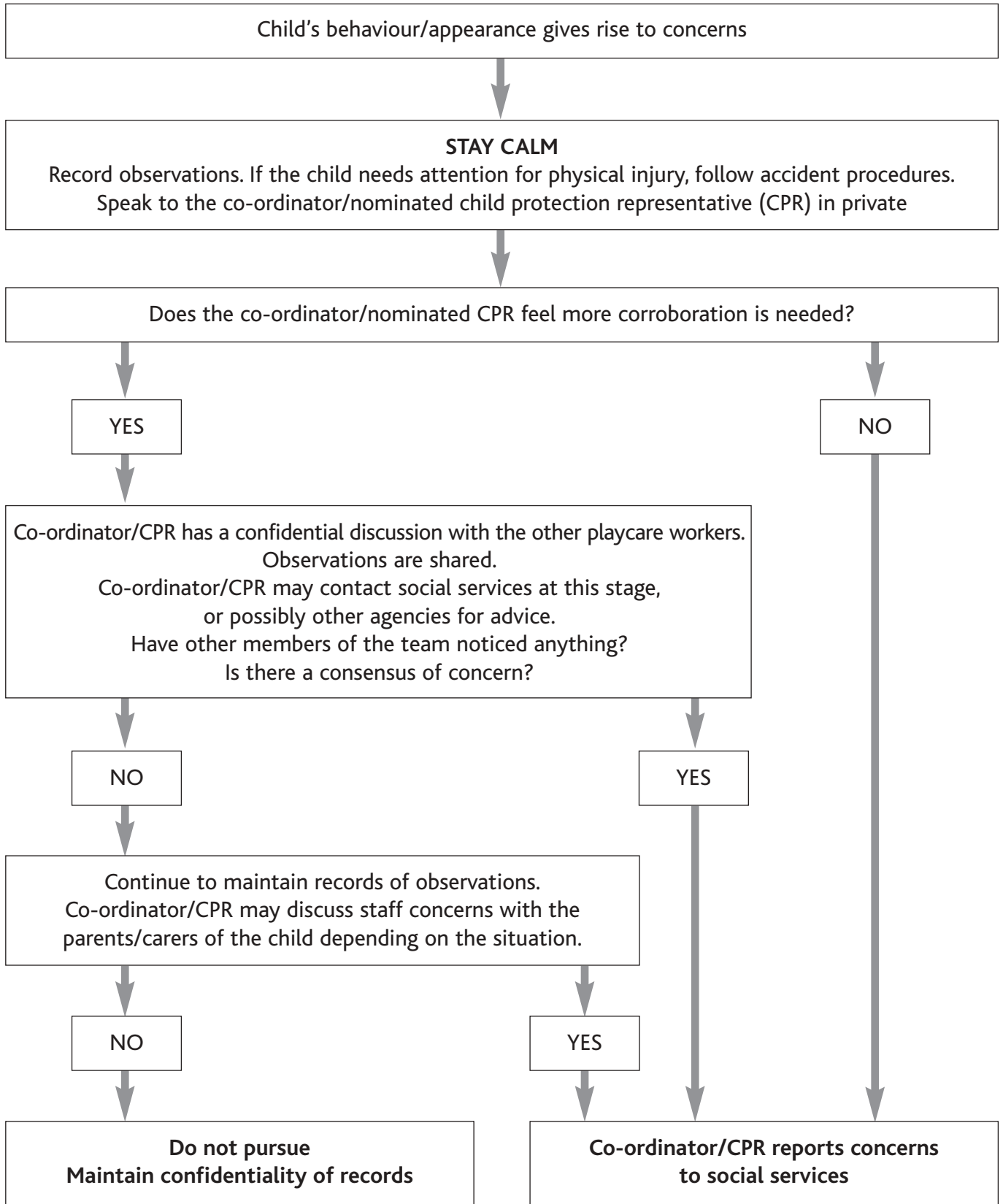
- **Do** treat any allegations extremely seriously and act at all times towards the child as if you believe what they are saying.
- **Do** tell the child they are right to tell you.
- **Do** reassure them that they are not to blame.
- **Do** be honest about your own position, who you have to tell and why.
- **Do** tell the child what you are doing and when, and keep them up to date with what is happening.
- **Do** take further action – you may be the only person in a position to prevent future abuse – tell your nominated person immediately.
- **Do** write down everything said and what was done (see **Step 3** on page 9).
- **Do** seek medical attention if necessary.
- **Do** inform parents/carers unless there is suspicion of their involvement.

DON'T

- **Don't** make promises you can't keep.
- **Don't** interrogate the child – it is not your job to carry out an investigation – this will be up to the police and social services, who have experience in this.
- **Don't** cast doubt on what the child has told you, don't interrupt or change the subject.
- **Don't** say anything that makes the child feel responsible for the abuse.
- **Don't Do Nothing** – make sure you tell your nominated child protection representative immediately – they will know how to follow this up and where to go for further advice.



Example Procedure for Suspected Abuse





Example Procedure for Disclosure of Abuse

A child says that they want to tell you something,
or begins to disclose what you think will be information about abuse.

STAY CALM

If the child asks you to keep it a secret you must explain that you may
have to tell another adult in order for you both to feel safe.
Even if you do not ask for it to be secret, make it clear before they continue that you may
have to tell someone else.

What are the circumstances?
Are there other adults or children within ear shot?
So you need to move in order to keep the information confidential?

Listen to what the child has to say, then go as soon as it is practical to your co-ordinator/nominated child
protection rep. and outline the disclosure. Make a record of this and keep it strictly under lock and key.
Keep any information or evidence you may need to show social services later.

The co-ordinator/CPR may feel it necessary to draw in other members of the team for a confidential
discussion, to gather other observations and keep staff informed of the situation.

The co-ordinator/CPR will contact Social Services/agencies for advice and support.
This may develop into a formal report through social services. (For details of the social services
procedures in the event of disclosure of abuse, contact your local patch office.)

REMEMBER

Don't dismiss a child's concerns
Listen carefully to what they say, don't jump to conclusions
Keep the child and you safe by telling your co-ordinator/nominated CPR
If the child continues to attend your service, make sure the team are aware of the issues
Make sure you know your local social services contacts, the better relationship
you share as colleagues, the more positive a response you can make.



Step 3

Establish confidential records of concern

When a child protection concern arises, it is essential that someone records what is said or seen and what action was taken. These records are extremely sensitive, and should be kept in a locked cabinet or drawer. Access should be limited to only the nominated child protection representative and the project leader or manager.

The record may be shown to the police or social services and could possibly be used in court, although this is rare. The young person concerned can be shown this document but discretion should be used. If appropriate, the young person's permission should be obtained before showing to the parent/carers.

Although your group's record of concerns may include additional information, the following box contains a list of items that should be included as far as possible:

Items to be included in a Record of Concern

- Name of child
- Child's address
- Name of parent/carer(s)
- Phone numbers for parent/carer(s) and child
- What is said to have happened or what was seen?
- When and where did it occur?
- Who else, if anyone, was involved and how?
- What was said by those involved?
- Were there any obvious signs e.g., bruising, bleeding changed behaviour?
- Was the child able to say what happened, if so, how did they describe it?
- Who has been told about it and when?
- Do the parents know?
- Signature of person filing the record
- Date of record



Step 4

Collect contact names and details for outside agencies

It will be useful to have outside contacts for advice and guidance if child protection issues arise and you are not sure how to respond. There are a number of agencies that can provide guidance on child protection, although none of those listed below work specifically with voluntary and community groups. *Your group should assess which of these agencies are relevant and then collect their names and contact details.* This list is a good starting point, but there might be other agencies that you should include.

Outside Agencies and Resources on Child Protection

- **Area Child Protection Committees (ACPC):** These are inter-agency forums made up of the main agencies and professionals working with children in each Local Authority area. They are responsible for making sure that child protection arrangements work effectively in each area and co-ordinating child protection across agencies. Your group should be aware of the local ACPC and the way it operates. If you have concerns about the abuse of a child, these will need to be reported to the ACPC by your nominated representative.
- **Social Services Departments, Education Departments, Police, Schools, Healthcare providers, Probation services and voluntary agencies** all have a role in identifying, reporting and in some cases investigating allegations of abuse. Your group should seek to make links with relevant agencies in their area.
- **National voluntary organisations** and their local branches (e.g. NSPCC, Barnardos, NCH Action for Children) may all have expertise in this field and may be of assistance in promoting the issue of child protection.
- **OFSTED/ Early Years Development and Child Care Partnerships (EYDCP):** Many groups providing day care or crèche services are required to register with OFSTED. It is a requirement of the registration process that groups have a child protection policy. Local EYDCPs have a statutory responsibility to support groups through their OFSTED registration process, including developing child protection policies, procedures and practices.
- **Criminal Records Bureau (CRB):** Since April 2002, the CRB carries out checks on the suitability of paid staff and volunteers to work with children and young people. More information about CRB checks is provided on the next page.



Step 5

Establish safe recruitment procedures

Determined abusers have often managed to gain access to children and young people. Your policies and procedures are important safeguards to stop this happening. They will be understood by good applicants and will put ill intentioned people off. It is best practice that all volunteers and staff, including temporary workers and helpers when possible, should be subject to a careful selection and vetting process that includes the following:

- Completion of an application form
- Checking the person's identity. Preferably, an identity check should be done with photo identification (e.g., passport).
- Taking up references, which are seen before the interview and verified by a follow up phone call
- An interview preferably by two people
- Identifying reasons for gaps in employment or inconsistencies
- Obtain full disclosure through checks from Criminal Records Bureau (see box below for details)
- Allowing no unsupervised access to children and young people until this has been completed (e.g., no appointment until references have been reviewed)
- Seeking advice about recruiting someone with a criminal record or other types of offences if you are concerned
- A supervised probationary period for new people to the project and a comprehensive induction period that includes training in your child protection policies and procedures

Criminal Records Checks and Vetting

Checks should be carried out on all people applying to work with children, including volunteers. This service has recently been taken over by the Criminal Records Bureau. The CRB will provide checks of:

- Police criminal records via the Police National Computer
- PoCA list (The Protection of Children Act List) and List 99 – lists of people who are disqualified from working with children and young people.

Information on the CRB is available at www.crb.gov.uk. In most cases, an application for a check will need to be put through a local 'Umbrella Body' registered with the CRB. For information on local agencies that act as 'Umbrella Bodies', contact Action in Rural Sussex or go to www.disclosure.gov.uk. There is likely to be a small administrative fee to the agency carrying out the checks. If you are applying to the Local Network Fund, you may include these administrative costs in your grant application.



Step 6

Requirements for staff training, monitoring and supervision

General Training

Your group should run or arrange for basic training and induction for current and new workers and volunteers.

Training should cover:

- Basic definitions of abuse
- Signs of abuse
- Behaviour of abusers
- What to do if someone tells you they are being abused
- What to do if you suspect abuse

After the training, you need to make sure that all project workers and volunteers understand the types of abuse and agree to report any concerns to the nominated person.

Training for Nominated Child Protection Representative

In addition, it is very important that the nominated child protection representative receives special training because he/she is the person with the responsibility for making sure any child protection issues are responded to properly.

In particular, the representative should:

- Be checked by the Criminal Records Bureau
- Know about signs and symptoms of abuse
- Know about how abusers (perpetrators) behave. Ask about training if you don't know these things
- Know about your local Area Child Protection Committee (ACPC) guidelines on dealing with concerns about abuse. Ask your local council's principal officer for child protection for a copy of the guidelines and about any training available from the ACPC
- Know who to contact in Social Services so that you can either:
 - Ask for advice when you are not sure what to do
 - Refer a case without delay where there are child protection concerns
- Make sure the children and young people using the project know:
 - About the child protection policies and procedures
 - You are the person to speak to if they have any concerns
 - Who to speak to if you are not there
 - Make sure staff and volunteers know how to respond if a child or young person talks to them about abuse
 - Make sure they have a copy of the project's code of behaviour and guidelines and have understood them



- Provide information about helplines and other sources of help for children and young people.
- Make sure you are aware of factors that cause children to be vulnerable to abuse. For example, research has demonstrated that disabled children can be particularly vulnerable to abuse for several different reasons. Reasons include:
 - a dependency on others for their primary needs such as feeding, clothing and intimate care
 - different communication methods or lack of appropriate vocabulary might provide a barrier for a child wanting to communicate about their concerns
 - isolation within a residential setting
- Ensure an environment in which staff have the opportunity to raise any child protection concerns. Fear of retribution can be a powerful silencer.
- Recognise that racism has demonstrated that children and families from minority ethnic groups often fail to receive an appropriate service from the statutory authorities when concerns are raised about a child's welfare. Over-action and inaction have both been shown to be based on misunderstandings and misinterpretations of different cultural patterns, which have led to failing to meet children's needs. More overt racist attitudes and behaviours also play a part in this process.

Monitoring and Supervision

Finally, your group should establish monitoring and supervision measures for paid workers and volunteers. These measures should ensure that workers and volunteers:

- understand the group's child protection policies and procedures
- adhere to the group's code of behaviour (see next step)
- remain vigilant and responsive.

These arrangements can be implemented through discussions and meetings with workers and volunteers. Staff evaluations may include child protection issues. Records should also be kept regarding staff training on child protection.

Finally, it is important that your group not only monitors but also supports workers and volunteers in child protection issues. Staff should be encouraged to ask questions and talk to the nominated child protection representative about any concerns related to child protection.



Step 7

Prepare a code of behaviour for staff and volunteers

A code of behaviour is for all volunteers and workers involved in a project. The code should make clear what is appropriate and what is not, for example, all adults working in pairs, advice about physical contact and restraint, how to manage intimate care tasks, etc.

A code of behaviour can include rules and arrangements for:

1 Appropriate conduct and relationships with children and young people

For example, with respect to physical contact, your code of behaviour may outline that staff should:

- Avoid initiating physical contact with children
- Avoid physical expressions of emotion such as kissing or hugging
- Avoid intrusive forms of play (e.g., tickling, rough and tumble). If physical contact is offered from a child, cease it at the earliest possible moment without causing the child to feel rejected
- Avoid any physical contact when alone with a child
- If a child persists in physical contact that is inappropriate, it must be explained that staff should not kiss/hug people that they work for or with.
- If the child continues to persist with inappropriate contact, the matter should be brought to the attention of a senior member of staff.

Your code of behaviour may state that the following specific behaviours should not be allowed:

- Sexual conduct
- Lending or borrowing of money or property
- Giving or receiving gifts
- Exclusive or secretive relationships
- Taking project users to your home

2 Physical restraint

For example: workers may be required to restrain a child in order to prevent imminent injury to an individual or themselves, or to prevent serious damage to any property.

3 Relationships between personnel

Your code of behaviour should state that relationships between personnel (both paid workers and volunteers) should be based on mutual respect. All employees should be expected to contribute and take responsibility to ensure a positive working environment and to conduct themselves accordingly.



Step 8

Prepare a complaints procedure

A complaints procedure allows people a safe and easy way of voicing complaints or concerns. Some complaints procedure may also incorporate the idea of "whistle blowing". "Whistle-blowing" is used to describe incidents where people publicly report an alleged wrongdoing within an organisation. An open, well-publicised complaints policy can encourage children and adults to voice concerns about abusive or unethical behaviour. A well-written and implemented complaints procedure will also ensure respectful responses to all complaints that are voiced.

Your complaints procedure should have three parts:

1 Introduction to the procedure

2 How to make a complaint

3 How your group will respond to the complaint

1 Introduction

Your complaints procedure should make it clear what it is intended to provide and who it is intended for.

You may wish to state that:

- Complaints are any clear expression of dissatisfaction with the group, its personnel, or its services
- The procedure deals with specific concerns including: a risk to the health or safety of any individual or improper conduct or unethical behaviour.
- Anyone may file a complaint including children, parents/carers, volunteers, paid workers, or other people outside the group.
- Making a complaint is as easy as possible
- Complaints are treated seriously whether it is made in person, by telephone, by letter, by fax, or by e-mail
- Complaints will be dealt with promptly, politely, and respectfully
- The group learns from complaints and uses them to improve its services



2 How to make a complaint

Your group should decide the most appropriate procedure for filing complaints. Below are a number of options:

- People may make a complaint in writing, by fax, by email, or by telephone. Complaints made in person should be made with someone else in the room to witness the complaint.
- Your group might want all complaints to be written down, even if they are made in person or the telephone, so that you can keep a confidential record of them
- The complaint may be resolved by taking it up immediately with the individual concerned, or with his/her immediate manager.
- If the individual concerned or his/her manager cannot resolve a complaint in this manner, the complainant should be directed to a member of the management committee.
- Your group should decide whether it will allow people to make anonymous complaints (possibly through an informal complaint process)

A formal complaint should include:

- The complainant's name and contact details (though in some cases, you may allow anonymous complaints)
- Copies of any relevant correspondence
- Name of people the complainant have written to or spoken to up to this point about the complaint
- Details about what has gone wrong or has been handled improperly
- An explanation of how the complainant would like the group to resolve the complaint

3 How your group will respond to complaints

The complaints procedure must outline a clear process by which complaints are handled. You might state:

- Who will respond to the initial complaint and within how many days.
- What happens if the complainant is not satisfied with the initial response
- What will happen if the complaint has still not been resolved – this may include calling in an independent body to assess the complaint
- Each response should include who to contact next if the person believes that the complaint has not been dealt with properly.
- A process for reviewing and incorporating what has been learnt from complaints

Appendix A

Special cases for child protection

a Trips away from home

Children need to be kept safe when taking trips away from home. It is therefore important that rigorous child protection policies and procedures are in place in addition to health and safety procedures, adequate insurance, etc. In putting together a trip away from home, some procedures to follow include:

General

- Ensuring children know how to behave, e.g. through a behaviour policy.
- Getting written consent from parents and, if necessary, holding a meeting for parents to give them a briefing on the outing.
- Asking parents about any special needs or requirements for their children.

Using activity centres and other external providers

- Using reputable organisations which have in place any licences or accreditation required (some adventure activities may require specific licences).
- If possible, visit the centre beforehand.
- Getting agreement on the activities to be undertaken if using an adventure activity provider.
- Ensuring external providers have proper safety procedures in place (e.g. insurance, maintenance of equipment/ transport, health and safety policies, recruitment of staff to work with children, child protection policies etc.).
- Ensuring the accommodation is suitable.

Staff/volunteers

- Having a person trained in first aid
- Have adequate staff ratios. These will depend on the age of the young people and the activity being planned, but DFES guidance on a typical school trip to a museum or historical site are:
 - 1 adult to 6 pupils for under-eights (more adults if under-fives).
 - 1 adult to 10–15 pupils for 8 to 11-year olds.
 - 1 adult to 15-20 pupils for over-elevens.

- Ensure all those attending are aware of their roles and responsibilities.
- Ensure staff/ volunteers are competent to lead children in activities.

Even greater care should be taken over trips abroad. The Local Network Fund, for example, is reluctant to fund trips abroad because of the increased risks.

Two publications in particular provide more detailed information on planning trips away are:

- * Safe Sport Away, produced jointly by the Amateur Swimming Association and the NSPCC.
- * Health and Safety of Pupils on Educational Visits, published by the Department for Education and Skills, available free or to download from www.dfes.gov.uk.

b Working with children with disabilities

For a number of reasons, children with disabilities are more vulnerable to abuse than others. For example children with disabilities may be more dependent on others for intimate care and may be less able to tell people about any abuse they experience. For these reasons, it is essential that rigorous child protection procedures are in place, especially with regard to recruitment checks on volunteers and paid workers, whistle blowing policies, and having clear guidelines setting out acceptable behaviour by those working with children with disabilities.

c Groups of parents and children.

In some cases, the volunteers on a project may consist solely of parents or carers looking after their own children. It is recommended that the group still have a policy to cover the activity, as the group and its trustees are still accountable for the project. However, the policies and procedures might be adapted, e.g. to focus more on a code of conduct for parents and children whilst using the project and how parents might deal with the reporting of an allegation of abuse by a child.



d Working with older teenagers, e.g. 16+

Given that child protection legislation covers all children and young people up to the age of 18, groups working with older children are still required to have child protection policies and procedures. The policy is likely to cover the same ground as a standard policy, but the section on acceptable behaviour might reflect the age of the young people.

e Projects only involving children and young people

In reality, few projects are likely to be made up solely of young people. In most cases, adults will have some responsibilities (e.g. as management committee members), or will come into contact in some way with the children on the project. In addition, children can abuse each other (e.g., bullying). It is therefore likely that a policy for such a group would cover the same ground as a standard child protection policy.

f Capital projects e.g. where group is to provide facilities for other groups

Some projects simply aim to provide facilities for other groups or young people to use, (e.g., skate park, playground, hall). On the face of it, it may seem that a group like this does not come into contact with young people and does not need a child protection policy. In reality, this is unlikely. If a project has any involvement of volunteers, any involvement of young people, or holds meetings, consultation events or even uses a public site, a child protection policy would be extremely valuable. Any contact with young people makes it necessary to have a child protection policy, and obviously this policy can be adapted to suit the nature of your project. In addition, complete child protection may also include health and safety concerns and appropriate insurance measures, and either provision or guidelines for the use of the equipment or venue once your project has ended.

g Use of the internet

The following procedures are recommended for community groups:

- Place the computer where everyone can use it and where everyone can see it, rather than out of sight in another room.
- Supervise use of the internet.
- Suggest sites that could be visited by children and young people, (e.g., those connected with children's TV programmes)
- Talk to children and young people about what sorts of sites they can and cannot visit.
- Inform children about chat sites are open to misuse and they should be as cautious of people they meet on the internet as adults they may meet in real life.
- Advise children and young people to not give out personal details over the internet, e.g. surname, address, phone number or e-mail address.
- Advise children to never arrange a face to face meeting with anyone they come into contact with on the internet.
- Encourage children to report anything they come across which they feel is abusive or offensive.
- Limit the amount of time children spend online.
- Explore the use of filters which block access to certain sites (although remember that these are unlikely to be foolproof and cannot replace proper supervision).
- In addition, groups should not publish recognisable photographs of children on their own websites

Appendix B

Child protection, the law and other references

a Legal context

There are a number of recent Acts of Parliament relevant to the area of child protection. The Acts mentioned below provide the legal framework in which child protection takes place. As such, any child protection policy should explicitly refer to these Acts to show how the policy fits within this legal framework.

- The Children's Act 1989: This Act sets out how the welfare and developmental needs of children are of paramount importance and over-ride other considerations. Two key sections of the Act are: Section 17, which sets out the rights of children to have an assessment of their needs and the role of statutory bodies in ensuring these rights are met. Section 47 which sets out a local authority's responsibility to investigate if it believes that a child is suffering is likely to suffer significant harm.
- The Protection of Children Act 1999: This Act sets out the framework to enable employers to check on the suitability of employees seeking to work with children. Groups defined specifically as 'childcare organisations' must apply the provisions of the Act, whilst other organisations working with children are encouraged to do so. The Act builds on the Police Act (1997) which set up the Criminal Records Bureau. A child care organisation is defined as an organisation 'which is concerned with the provision of accommodation, social services or health care services to children or the supervision of children'.
- The Human Rights Act 1998: This Act sets out the rights of children and families and reflects principles in international agreements. The Act gives the public the right to challenge what they perceive as an infringement of their human rights.
- Sexual Offences (Amendments) Act 2000: This Act introduced the concept of abuse of trust, whereby adults could commit an offence in engaging in sexual activity with someone younger than them if they are seen to be in a position of trust, even if the younger person is above the age of consent (e.g. teachers and pupils).
- The UN Convention on the Rights of the Child: This includes a young people's charter, setting out how all children should have access to basic human rights. The Convention on the Rights of the Child outlines in 41 articles the human rights to be respected and protected for every child under the age of 18 years and requires that these rights are implemented in the light of the Convention's guiding principles.

As a result of the Victoria Climbié enquiry and the Laming Report (2003), the government is reviewing the law regarding child protection, and the responsibilities of all agencies that care for Children and Young People. You should always make sure that you have the most up-to-date policies on which to base your work and procedures. You can find up-to-date information from the NSPCC (<http://www.nspcc.org.uk/>) or your local Area Child Protection Committee (<http://www.acpc.gov.uk/>).

b Government Publications

In addition to the laws in this area, government departments have produced a number of publications which give guidance on how the provisions or principles of the Acts are to be put in place. The main publications are as follows:

- Working Together to Safeguard Children (1999): This sets out the way in which all organisations working with children should seek to work together and have clear procedures on child protection, in line with the local Area Child Protection Committee (ACPC) procedures. (Home Office, Department of Health, Department of Education and Employment) <http://www.doh.gov.uk/quality5.htm>
- Safe from Harm (1993): This is a code of practice for safeguarding the welfare of children that is aimed at voluntary organisations. It sets out procedures which voluntary groups should consider adopting to safeguard children. Available from



Home Office, Publication enquiries, 50 Queen Anne's Gate, London SW1H 9AT;
www.homeoffice.gov.uk/acu/harm.htm)

- Caring for the young and vulnerable (2000): This is Home Office guidance on the need to ensure appropriate boundaries between volunteers or paid workers and young people. If these boundaries are broken, the volunteer or paid worker would be subject to prosecution and having the details recorded by the Criminal Records Bureau. Can be downloaded from the Home Office:
<http://www.homeoffice.gov.uk/cpd/sou/young.htm>

c Additional Resources

- Educare Home Study Programme (NSPCC). For further information, telephone the NSPCC National Training Centre on 0116 234 0804 or http://www.nspcc.org.uk/inform/CH_Training.asp £26.44 inc VAT
- First check: a step by step guide for organisations to safeguard children (NSPCC) Available from NSPCC, Tel: 0116 234 0804 or http://www.nspcc.org.uk/inform/CH_Training.asp. £21.50
- Health and Safety of Pupils on Educational Visits (DFES). Available from the Department of Education and Skills, http://www.dfes.gov.uk/h_s_ev/. The guide is free and can be ordered from DfES publications on Tel: 0845 6022260 or email dfes@prolog.uk.com. Quote Ref HSPV2
- Health and Safety in Youth and Community Work: A pocket guide (Doug Nicholls), Health and Safety in Youth and Community Work: A resource manual (Doug Nicholls) Both available from Russell House Publishing Ltd, 4 St Georges House, Uplyme Road Business Park, Lyme Regis, DT7 3LS)
- Safeguarding Children – Everybody's Business – video training pack (NSPCC) Available from NSPCC , Tel: 020 7825 2775. £80.25
- Safe Sport Away (Amateur Swimming Association & NSPCC). Available from NSPCC Child Protection in Sport Unit, Tel: 0116 234 7278.
- Working with Young People: Legal Responsibility & Liability, 5th Edition. Available from: The Children and Young People's Legal Centre, University of Essex, Wivenhoe Park, Colchester, Essex, CO4 3SQ Tel: 01206 872466

Appendix C

Ways to recognise child abuse and neglect⁴

a Physical Abuse

Visible Signs:

- Injuries to any part of the body
- Children who find it painful to walk, sit down, to move their jaws or are in some other kind of pain
- Injuries which are not typical of the bumps and scrapes associated with children's activities
- The regular occurrence of unexplained injuries
- The child who is frequently injured, where even apparently reasonable explanations are given

Behavioural Signs:

- Furtive, secretive behaviour
- Uncharacteristic aggression or withdrawn behaviour
- Compulsive eating or sudden loss of appetite
- The child who suddenly becomes ill co-ordinated
- The child who finds it difficult to stay awake
- The child who is repeatedly absent

What to listen for:

- Listen for confused or conflicting explanations of how the injuries were sustained
- Evaluate carefully what is said and preferably document it verbatim
- Consider if the explanation is in keeping with the nature, age and site of injury

Consider:

- What do you know about the family
- Is there a history of known or suspected abuse
- Has the family been under stress recently
- Do you have concerns about the family

b Emotional Abuse

The recognition of emotional abuse is based on observations over time of the quality of relationships between parent/carer and the child

Watch for parent/carer behaviours

- Poor attachment relationship with the child
- Unresponsive or neglectful behaviour towards child's emotional or psychological needs
- Persistent negative comments about the child
- Inappropriate or inconsistent developmental expectations of the child
- Parental problems that supersede the needs of the child
- Dysfunctional family relationships including domestic violence

Watch for child behaviours:

- Emotional indicators such as low self esteem, unhappiness, fear, distress, anxiety
- Behavioural indicators such as attention seeking, opposing, withdrawn, insecure
- Physical indicators such as failure to thrive/faltering growth, delay in achieving developmental, cognitive or educational milestones

⁴ From Recognising Child Abuse: a handbook for those who have the care of children and young people, East Sussex County Council. Approved by the East Sussex Area Child Protection Committee, 11 September 2001.



c Sexual Abuse

There may be no recognisable signs of sexual abuse but the following indicators may be signs that a child is or has been sexually abused:

Physical signs

- Signs of blood or other discharge on the child's under clothes
- Awkwardness in walking or sitting down
- Tummy pains
- Regression into enuresis
- Tiredness

Behavioural signs:

- Extreme variations in behaviour (e.g., anxiety, aggression, or withdrawal)
- Sexually provocative behaviour or knowledge that is incompatible with the child's age and understanding
- Drawings and/or written work which are sexually explicit (indirect disclosure)
- Direct disclosure; It is important to recognise that children have neither the experience nor the understanding to be able to make up stories about sexual assault.

d Neglect

Indicators of neglect are recognisable in the child, in the parent/carers' behaviour and within the home environment.

Physical signs

- Abnormal growth including failure to thrive
- Underweight or obesity
- Recurrent infection
- Unkempt dirty appearance
- Smelly
- Inadequate/unwashed clothes
- Hunger
- Listlessness

Behavioural signs:

- Attachment disorders
- Indiscriminate friendliness
- Poor social relationships
- Poor concentration
- Developmental delays
- Low self esteem

Environmental signs:

- Insufficient food, heating and ventilation in the home
- Risk from animals in the household
- Inappropriate sleeping arrangements and inadequate bedding
- Dangerous or hazardous environment