



# **Children and Adults at Risk Safeguarding Policy**

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Section	Page Number
<b>1. Contents</b>	2
<b>2. Context</b>	3
<b>3. Statement of Policy</b>	4
<b>4. Scope of Policy</b>	6
<b>5. Roles and Responsibilities</b>	7
<b>6. Application of Policy</b>	10
<b>7. Further Information and Guidance</b>	16
<b>8. Policy Ownership and Status</b>	18
<b>9. Appendices</b> Appendix A - Types of Abuse Appendix B - Code of Practice	19

The Company aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children and adults at risk coming onto its premises and engaging in Company-related activities. The Company encounters children and adults at risk in a variety of settings, including through its teaching and research activities, as well as through its outreach programs.

The term safeguarding is used to define actions taken to protect vulnerable groups from harm. This harm might come from adults or other children and, as someone with a responsibility for safeguarding at the Company, it is important for all members of the Company to understand what safeguarding is and why it is important.

The Company is fully committed to meeting the requirements of safeguarding, both in relation to children and adults at risk, in order to ensure that they are safeguarded whilst enjoying opportunities to develop their full potential.

The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Children Act 1989
- The Police Act 1997
- Protection of Children Act 1999
- Management of Health and Safety at Work Regulations 1999
- The Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (as amended by Protection of Freedoms Act 2012)
- Equality Act 2010
- Education Act 2011
- The Counter-Terrorism and Security Act 2015
- General Data Protection Regulation 2018

The Safeguarding Vulnerable Groups Act 2006 is of particular importance to this policy document as all decisions made to bar individuals from working with children or adults are made by the Disclosure and Barring Service (DBS) via this legislation.

This document states the Company's policy on preventing and reducing harm to children and adults at risk when they are in contact with Company staff, workers, volunteers, apprentices or students.

The policy aims to:

- Promote and prioritise the safety and wellbeing of children and adults at risk;
- Raise awareness that everyone who comes into contact with children/adults at risk (and their families) has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is centred around the vulnerable individual. This means that they should consider, at all times, what is in the best interests of the child and/or the adult at risk.
- Provide assurance to parents, carers and other parties that the Company takes reasonable steps to manage risks and keep children and adults at risk safe;
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training and support on safeguarding matters;
- Put in place proportionate safeguards to prevent the employment of individuals in work with children and/or adults at risk where they have been barred by the DBS or are deemed by the Company to pose an unacceptable risk to vulnerable groups;
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with Company staff, students, apprentices or volunteers, whether the harm has taken place on Company premises or not.
- Ensure all staff are able to reassure victims of abuse that they are being taken seriously and will be supported.

The Children and Adults at Risk Safeguarding Policy also seeks to manage effectively the risks associated with activities and events involving children and adults at risk through departments/institutions:

- Completing a risk assessment process which involves identifying risks and means of reducing or eliminating these;
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis;
- Ensuring that the appropriate DBS checks, or other appropriate screening checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children or adults at risk;

- Requiring new employees and individuals involved in working with children or adults at risk to familiarise themselves with the content of this policy and the associated Code of Practice.
- Ensuring appropriate whistleblowing procedures are in place for such safeguarding concerns to be raised with the Company's senior leadership team.

This policy requires that any suspicions and allegations involving harm to children and/or adults at risk are referred to the designated safeguarding lead, or their deputy, to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and sensitively. It will also ensure that appropriate steps are taken as a result of any investigations, which may include contacting the police, social services and/or fulfilling the legal duty to refer information to the DBS as required.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and adults at risk from abuse and the need to protect staff, students, apprentices and volunteers from false or unfounded accusations. Any individual who raises a child protection concern will not be subject to any adverse or detrimental treatment.

The Children and Adults at Risk Safeguarding Policy should be used as the basis of each department/institution's approach to preventing and reducing harm to children and adults at risk. However, departments/institutions are permitted to develop their own procedures, in line with the overarching policy, to address any safeguarding matters of particular relevance to them.

Departments/Institutions are not required to undertake screening checks for employees who are or will be working with other employees who may be deemed as Adults at Risk (as defined within the Scope of Policy).

The Company's employees, workers, volunteers, apprentices and students are subject to and in scope of this policy.

For the purposes of this policy, a child is defined as any person under the age of 18.

Under Statutory guidance, an Adult at Risk is a person aged 18 years or over, who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

The policy covers:

- Recruitment to a new or existing post which involves working directly with children and/or adults at risk;
- The commencement of new activities or events involving or potentially involving children and/or adults at risk; and
- Changes being made to activities or events involving or potentially involving children and/or adults at risk.

It is expected that external bodies utilising the Company's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities. In addition, whilst on our premises, external bodies are also expected to have due regard to this policy.

The policy does not apply to any separate legal entities that have responsibility for their own internal safeguarding policies and procedures.

### 5.1 Designated Safeguarding Lead (and deputy)

The Company's designated safeguarding lead is the Commercial Director. The Technical Director is the nominated designated safeguarding deputy.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility cannot be delegated.

In the event that the designated safeguarding lead or their deputy are unavailable, other officers will be identified to ensure a continuous provision of safeguarding oversight.

The designated safeguarding lead, or deputy, should always be available to discuss any immediate safeguarding concerns. The designated safeguarding lead and deputy should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The designated safeguarding lead, and/or their deputy, is responsible for:

- Promoting the Children and Adult at Risk Safeguarding Policy, both within HR and to departments/institutions.
- Dealing with any reported suspicions and allegations of abuse of children or adults at risk within the Company.
- Providing appropriate information when making referrals to external agencies (such as Social Services, the DBS or the Police) in all cases of suspected abuse of children or adults at risk.
- Ensuring that appropriate records are kept in relation to the reporting of any safeguarding incidents.
- Leading the review and update of the policy document on an annual basis and for working with PPD and Health and Safety to ensure that adequate training is available for staff on safeguarding.

### 5.2 Head of Department/Institution responsibilities

Each Head of Department/Institution is accountable for the adoption and implementation of this policy. They are required to promote the importance of safeguarding within their institution and ensure that appropriate systems are in place for:

- Familiarising all staff with the Children and Adults at Risk Safeguarding Policy, including the Code of Practice, during their induction;
- Ensuring that relevant staff are familiar with the department/institution's proposed activities and follow the Children and Adult at Risk Safeguarding risk assessment process.

In the event of suspicions or allegations being raised in a non-emergency context, the Head of Department/Institution is the first point of contact.

The Head of Department/Institution must then escalate matters to the Commercial Managing Director.

### **5.3 Individual responsibilities**

All staff, apprentices, students and volunteers working with children and adults at risk within the Company must be familiar with this policy. In addition, they must, wherever possible, conduct themselves in accordance with the Code of Practice. This provides guidance on acceptable and desirable conduct to protect both children and adults at risk who come onto Company premises to study and to visit, and those working with them.

It is the responsibility of the member of staff leading a recruitment campaign, activity or event which involves working with Children and Adults at Risk to:

- Identify that the Children and Adults at Risk Safeguarding procedure is applicable to a particular role, activity or event.
- Assess potential new recruits using a range of different selection methods, probing the candidates' attitudes, values and motivations in relation to working with vulnerable groups.
- Ensure that staff, workers, apprentices, volunteers and students working with children and adults at risk are familiar with the contents of the policy and its application before any new or changed activity/event, including the Code of Practice;
- Complete and update a risk assessment, where appropriate;
- Ensure implementation and review of the actions identified by the risk assessment;
- Identify whether individuals recruited or involved in an activity or event require a DBS check, or other appropriate screening check, and, where applicable, ensure that this is carried out in accordance with HR procedures.

### **5.4 The HR Team**

The HR Team processes DBS checks for staff and can advise of levels of checks required for roles.

The HR Team also manages the administration of DBS checks for students.



## **5.5 Temporary Employment Service (TES)**

TES provides advice and support for departments/institutions on the arrangement of work experience, including for children, to ensure that appropriate arrangements are in place and that there is compliance with relevant legislation. In addition, TES have procedures relating to engaging with children in the context of work experience.

The Department for Education defines five main types of abuse, which are outlined in Appendix A.

It is not always easy to recognise a situation where abuse may occur or has taken place and Company employees are not expected to be experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or adult at risk. It is important that the recipient of any complaint or accusation that a child or adult at risk has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

### **6.1 Examples of Company activities involving children and adults at risk**

Company staff or students may encounter children and adults at risk in a wide range of situations. For example:

- Teaching, training or instructing children, whether supervised or unsupervised;
- Work experience students and Apprentices under 18;
- Widening participation outreach activities with schools and colleges (in Birmingham and external);
- Student Community Action;
- Birmingham Science Festival (Science week);
- Childcare provision in the Company's nurseries and playschemes;
- School and nursery visits;
- Community sports projects;
- Photography of children for publication;
- First aid delivery;
- Open days;
- Workshops;
- Working with disabled students.

## 6.2 Safer recruitment/engagement practices

### 6.2.1 Raising awareness of the policy

Departments/institutions must ensure that all new members of staff, workers and apprentices are made aware of this policy and that they are given time to read it during their induction period.

Any person who will have direct contact with a child or adult at risk as part of their day-to-day employment, or event/activity, would be expected to undertake appropriate training. Any decision to undertake such training should be made on a proportionate basis.

Training is available via a variety of online providers. Relevant providers are as follows:

- NSPCC: <https://learning.nspcc.org.uk/training/>
- The Solihull Safeguarding Partnership Board: <https://www.safeguardingsolihull.org.uk/lscp/>
- Ann Craft Trust: <https://www.anncrafttrust.org/>

### 6.2.2 Risk Assessment Process

Organisations are required under health and safety legislation to conduct their business in such a way as to ensure, so far as reasonably practicable, that persons (non-employees) who are likely to be affected by it, are not exposed to risks to their health and safety. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Children and Adult at Risk Assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department/institution):

- Recruitment to a new or existing post which involves working with children and/or adults at risk;
- The commencement of new activities or events involving or potentially involving children and or adults at risk;
- Changes being made to activities or events involving or potentially involving children and or adults at risk.

The risk assessment should:

- Identify the nature, length and frequency of the contact and if it would be supervised or unsupervised;
- Consider if there will be children and adults at risk present;
- Consider whether any children or adult at risk have allergies, are on medication, have any disabilities (physical or mental), or any behavioural difficulties;

- Identify any potential areas for harm;
- Evaluate the risks;
- Determine actions to prevent harm occurring, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented;
- Identify those situations that would require a DBS check

Please note that where there are multiple posts, activities or events of a similar nature, it is unnecessary to complete an individual risk assessment for each of them. Instead, it is possible to complete an overarching assessment for a particular type of post, activity or event and ensure that it manages the relevant risks appropriately.

Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within their planning process and ensures that it is completed. A risk assessment must be completed in advance of the relevant recruitment campaign, activity or event by a competent person (where there are not current, adequate and documented risk management procedures already in place).

It is important to note that the Company's insurance may be invalid if a claim is made and no risk assessment is in place.

The purpose of the risk assessment is to enable the responsible person to identify, mitigate and remove any potential risks relating to contact with children or adults at risk. This can also be a prompt to consider alternative working practices, such as minimising occasions where an individual is alone with a child or adults at risk and considering whether the activity could be supervised or observed by others.

Any actions identified as a result of completing the risk assessment must be completed within the timescales specified on the form.

Completed risk assessments should be retained by departments/institutions whilst an activity/event is ongoing and for five years after it has ceased (or the risk assessment has been superseded). Where an activity is ongoing but unchanged, institutions should review the risk assessment on an annual basis to ensure that the measures put in place are still relevant and appropriate.

It is important for departments/institutions to remember to complete a risk assessment prior to any work experience placement being provided and provide this to the HR Lead.

### 6.2.3 Identifying required checks

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with children and/or adults at risk.

#### Disclosure and Barring Service (DBS) checks

Employers are entitled in law to apply for a Standard or Enhanced DBS check **only** where the activity is 'regulated' or the activity in question falls within one of the other statutory exceptions permitting checks on spent convictions. Basic DBS checks can be requested where the activity would not meet this criteria, but use of such checks must be proportionate to the type and length of activity.

There are three types of check available from the DBS:

- **Basic** – contains details of unspent convictions only. No criteria/eligibility in law to request such a check, but within the Company a basic disclosure can only be requested where the role meets certain relevant criteria set out by the DfE.
- **Standard** - contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not 'protected'. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS's web pages.
- **Enhanced** - contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with children or adults in regulated activity (particular types of work with children and adults).

### 6.3 Dealing with reported suspicions and allegations

Concerns for the safety and wellbeing of children and adults at risk could arise in a variety of ways and in a range of situations. For example, a child/ adult at risk may report or show signs of abuse, someone may hint that a child/adult at risk is or has been subject to harm, or that a colleague is an abuser, or someone may witness abuse.

Where an individual suspects or is informed that a child or adult at risk has been, is being, or could be harmed as a result of taking place in a Company activity/event or through contact with Company staff, workers, volunteers, apprentices, or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must take the following steps:

1. **In emergency circumstances** (i.e. where there is certain, immediate and/or significant danger to an individual, an individual has suffered or is likely to suffer significant harm, or a criminal act has been witnessed), **referrals must be made to the Police, social services or other appropriate authorities.** This should always be prior to consulting with the designated safeguarding lead, or their deputy. Where this is necessary, the designated safeguarding lead, or their deputy, should be informed immediately afterwards. In such cases, a criminal investigation may follow.
2. Where the situation is **not an emergency**, referrals should be channelled as follows:
  - i. The Head of Department/Institution; then
  - ii. The relevant Business Manager; then
  - iii. The designated safeguarding lead, or their deputy (Commercial Director or Technical Director);

Where one or more of the above is not available, the process should be followed through as above until a relevant individual can be contacted. If no relevant individual can be contacted, a relevant officer should then be notified (for example, the Head of HR or the Head of Administration)

3. (Optional) Where there are concerns about abuse, further advice and guidance can be sought from the NSPCC Helpline on 0808 800 5000 or Childline on 0800 1111. However, this should not take precedence over the two stage process, as above.

Where a complaint of abuse is reported, the designated safeguarding lead, or their deputy, will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant head of institution and take further action through the relevant internal procedures.

For all allegations raised, the following information must be recorded and retained in a confidential manner:

- a clear and comprehensive summary of the allegation, including who made it and who it was against;
- details of how the allegation was followed up and resolved;
- a note of any action taken, decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police (if applicable); and,
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained for 6 years after the end of the employment of the person the allegation was made against (in line with the retention period for most standard personnel records).

The Company has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral to the DBS must be made in line with the [DBS barring referral guidance](#).

The Company must not knowingly allow a barred person to work in 'Regulated Activity' (see 'Identifying required checks', below).

It is impossible to promise complete confidentiality when a concern is raised or an accusation made. This is because the Company must take reasonable steps to ensure the safety of children and adults at risk on its premises. However, as part of this policy, only people who need to be informed about an incident or concern, whether internal or external to the Company, should be informed.

Individuals should also give consideration to the following:

### **Prevent**

Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on specified authorities – including most higher education institutions – to have ‘due regard to the need to prevent people from being drawn into terrorism’. This is commonly referred to as the ‘Prevent duty’.

Where there is reason to believe that a student to whom this policy applies may be at risk of being drawn into terrorism, the Prevent Co-ordinator should be consulted.

### **Data protection**

The Company complies with the principles of the General Data Protection Regulation 2018 and Human Rights Act 1998 in the way it collects, holds and disposes of personal information.

All information relating to safeguarding (risk assessments, training, records of concerns raised, event management documentation, photograph consent forms, etc.) should be handled in line with the Company’s Data Protection Policy and retained in line with its Statement of Records Management Practice and Master Records Retention Schedule. This includes sharing on a need-to-know basis where appropriate and providing appropriate privacy notices as applicable.



## **Further guidance**

This policy should be read in conjunction with all other Company policies and procedures.

**8.****Policy Ownership and Status**

The Children and Adults at Risk Safeguarding Policy is owned by the HR Division. It will be reviewed annually, and updated where appropriate by the HR Division, in consultation with the Administration, to ensure compliance with relevant legislation and internal change.

The HR Division will ensure that each published version of this policy is archived, along with details of when it was in operation.

**Version Control**

<b>Version</b>	<b>Summary of Amendment</b>	<b>Date</b>
1.0	Draft of original policy to take account of new legislation and procedures	July 2022
1.5	Re-draft of original policy to take account of new legislation and procedures	August 2023

### 9.1 Appendix A – Types of Abuse

The categories of abuse below are produced from external guidelines<sup>4</sup>. A person may abuse or neglect a child/adult at risk by inflicting harm, or by failing to act to prevent harm. All staff should also understand the importance of challenging inappropriate behaviour between children and young people (peer on peer abuse), as defined below.

There are five main forms of abuse, although there are variations within these. Where reference is made to a child, such reference is also applicable to an adult at risk in all cases.

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which 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 fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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<sup>4</sup> The Department for Education guidance: "Keeping children safe in education" guidance (2019): <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical

contact, including assault by penetration, or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, nude, semi-nude or sexual images or videos, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

## 9.2 Appendix B – Code of Practice

When working with children and/or adults at risk, Company staff, apprentices, students and volunteers are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities.
- Wherever possible, work in an open environment with children where they can be seen by others.
- Avoid unnecessary physical contact.
- Avoid taking a child or adult at risk alone in a car on journeys, however short.
- Avoid taking a child or adult at risk to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person).
- In a situation where you are alone with a child or adult at risk, make sure that others can clearly observe you.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
- Avoid showing favouritism towards particular participants.
- Report incidents of alleged abuse in line with the guidance as contained within this policy.
- Report any concerns about poor practice to senior management in the relevant department/institution or your HR Business Manager/Adviser.
- Report any accidents to the designated person in the department/institution for recording and investigation where required.
- Avoid personal relationships with a child or adult at risk.
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”.
- Staff, apprentices, students and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
- Only official Company or department/institution social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with children or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).
- Do not make suggestive or inappropriate remarks to or about a child or adult at risk, even in fun, as this could be misinterpreted.
- Participate in training available to you to support you in your work with children and adults at risk.
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening.

- Do not take children or adults at risk to your home or alternative location which is not related to the specific activity/event.
- Maintain confidentiality about sensitive information where it is appropriate to do so.
- Where it is necessary for staff, apprentices, students or volunteers to take photographs or video images of children or adults at risk, doing so requires a lawful basis for processing under the UK GDPR. Where the taking of photographs or video images is optional, consent should be obtained. In circumstances where the taking of photographs or video images is necessary, another lawful basis of processing (such as legitimate interest) should be relied upon and the individuals (or parents/carers) must be given the opportunity to object.