



## **Albanian International School - Child Protection Policy**

**2022**

The AIS Board of Directors (BoD) and School Administration of Albanian International School (AIS) recognize that child protection and welfare considerations permeate all aspects of school life and must be reflected in all of the school's policies, practices and activities.

Therefore, the BoD of AIS has agreed to the following Child Protection Policy:

### **Albanian International School Child Protection Policy**

The Designated Contact Person (DCP) is Suzan Arrer, AIS Academic Director.

In its policies, practices and activities, AIS will adhere to the following principles of best practice in child protection and welfare. The school will recognize that the protection and welfare of children is of paramount importance, regardless of all other considerations.

AIS will:

- Fully cooperate with the relevant statutory authorities in relation to child protection and welfare matters.
- Adopt safe practices to minimize the possibility of harm or accidents happening to children and protect workers from the necessity to take unnecessary risks that may leave themselves open to accusations of abuse or neglect.
- Develop a practice of openness with parents and encourage parental involvement in the education of their children.
- Fully respect confidentiality requirements in dealing with child protection matters.

Certain policies such as our Code of Conduct, Anti-Bullying Policy, and Attendance Policy will take into account this Child Protection Policy. This Policy will also be considered with regard to the participation by pupils in school-related sporting activities, other extra-curricular activities, and school outings. Other school-related practices and activities, where child protection might have particular relevance, will take into due consideration the procedures outlined within this Policy. The BoD has ensured that the necessary policies, protocols, and practices as appropriate are in place with respect to each of the above-listed items.

This Policy has been made available to school personnel and is readily accessible to parents within the AIS Parent-Student Handbook as well as on request. It is available on our school website ([ais-tirana.org](http://ais-tirana.org)).

## **Designated Contact Person (DCP)**

The DCP at AIS is the Academic Director, Suzan Arrer; the Board of Directors has ratified this appointment.

The DCP has specific responsibility for child protection and will represent the school in all correspondence in connection with allegations of abuse.

The DCP acts in cases where there are reasonable grounds for suspicion or where an allegation has been made.

## **Confidentiality**

All information regarding concerns of possible child abuse should only be shared on a 'need to know' basis in the interests of the child. The giving of information to those who need to have that information is not a breach of confidentiality. This procedure exists for the protection of a child who may have been or has been abused.

## **Protection for Persons Reporting Child Abuse**

Albanian International School will provide immunity from civil liability to any person who reports child abuse 'reasonably and in good faith' to designated officers.

## **Definition and Recognition of Child Abuse**

Child abuse can be categorized into four different types:

- Neglect\*
- Emotional abuse
- Physical abuse
- Sexual abuse

\*Neglect can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, medical care.

## **Guidelines for Recognition of Child Abuse**

This policy draws attention to 'persistent evidence' of neglect, including indicators such as no lunch, lack of uniform, no homework, poor attendance, persistent health problems, lack of sleep, inappropriate television viewing late at night and other evidence that would indicate lack of supervision in the home. All signs and symptoms must be examined in the total context of the child's situation and family circumstances.

There are commonly three stages in the identification of child abuse:

1. Considering the possibility
2. Looking out for signs of abuse
3. Recording of information

## **Handling Disclosures from Children**

Staff is advised to deal with each situation sensitively, reassure the child but not to make promises that cannot be fulfilled.

The adult should not ask leading questions or make suggestions. They should explain that further help may have to be sought. The discussion should then be recorded accurately.

The record should include reference to what was observed with sketches of physical injury where necessary. It should also record when the alleged incident took place. Records should be kept in a secure place. The information should then be conveyed to the school DCP.

### **Allegations or Suspicions in relation to School Employees**

The Albanian International School and DCP are primarily concerned with the protection of the children in their care. However, employees must be protected against false and malicious claims.

Legal advice should be sought by the board in relation to the employee. If the allegation is against the DCP, the Chairperson of the BoD will assume responsibility for reporting the matter to the proper authorities.

### **Reporting**

When an allegation of abuse is made against a school employee, the DCP should first acquire a written statement of the allegation from the person/agency making the report. A parent/guardian may make a statement on behalf of a child. The DCP should always inform the Chairperson of the BoD.

School employees, other than the DCP, who receive allegations against another school employee, should immediately report the matter to the DCP. School employees who form suspicions regarding conduct of another school employee should consult with the DCP.

The employee should be informed by the DCP:

- a. That an allegation has been made against him/her
- b. The nature of the allegation
- c. Whether or not the authorities have been informed.

### **School Measures Taken to Protect the Children in Our Care**

There are several areas where common sense in our school should prevail in order to protect the children in the school and the staff who care for them. In relation to this, certain points should be noted:

1. A copy of the school's child protection policy, which includes the names of the Designated Contact Person (DCP) and Deputy DCP, will be made available to all school personnel and is readily accessible to parents on our website.
2. The name of the DCP and other relevant support services are displayed in a prominent position near the main entrance to the school.
3. Albanian International School will undertake an annual review of its Child Protection Policy and its implementation by the school. The school has put in place an action plan to address any areas for improvement which might be identified in the annual review. The Board of Management shall make arrangements to inform school personnel that the review has been undertaken.
4. Staff who take swimming classes should make sure that there are two adults in attendance at all times. The dressing rooms and pool area should be well supervised.
5. Staff should not be alone in a classroom with one child or detain a child on their own after school.
6. When possible children should work in groups.

## **APPENDIX A**

### **Child Protection Practices**

The AIS BoD and staff have identified the following as areas of specific concern in relation to Child Protection. Following discussion and consultation, the staff and Board of Management have agreed that the following practices be adopted:

- Physical contact between school personnel and the child should always be in response to the needs of the child and not the needs of the adult.

While physical contact may be used to comfort, reassure, or assist a child, the following should be factors in determining its appropriateness:

- It is acceptable to the child
- It is open and not secretive
- The age and developmental stage of the child

School personnel should avoid doing anything of a personal nature for children that they can do for themselves. (See Intimate Care Policy)

School personnel should never engage in or allow:

- The use of inappropriate language or behaviors
- Physical punishment of any kind
- Sexually provocative games or suggestive comments about or to a child
- The use of sexually explicit or pornographic material

All media products (YouTube clips, CDs, DVDs, etc.) should be checked for their appropriateness with regard to age and suitability.

### **Visitors/Guest Speakers**

Visitors/Guest speakers should never be left alone with pupils. The school (principal/ teachers) has a responsibility to check out the credentials of the visitor/guest speaker and to ensure that the material in use is appropriate.

### **One-to-one teaching**

It is the policy in this school that one-to-one teaching is often in the best interest of the child. Every effort will be made to ensure that this teaching takes place in an open environment. Parents of children who are to be involved in one-to-one teaching will be informed and their agreement sought.

### **Changing for Games/ PE / Swimming**

Students will be expected to dress and undress themselves for Games/ PE/ Swimming. Where assistance is needed, this will be done in the communal area and with the consent of parents. Under no circumstances will members of staff/ volunteers be expected to or allowed to dress/undress a child in a cubicle/private area. In such situations where privacy is required, the parents/guardians of the child will be asked to assist the child.

### **Attendance**

AIS school attendance will be monitored as per our Attendance Policy. With regard to child protection, we will pay particular attention to trends in non-attendance. Any pupil with a pattern of poor attendance will be monitored for signs of neglect/physical/emotional abuse.

## **Behavior**

Children are encouraged at all times to play cooperatively and inappropriate behavior will be addressed under our Code of Behavior. If an incident occurs which we consider to be of a sexualized nature we will notify the DCP who will record it and respond to it appropriately.

## **Bullying**

Bullying behavior will be addressed under our Anti-Bullying Policy. If the behavior involved is of a sexual nature or regarded as being particularly abusive, then the matter will be referred to the DCP.

## **Children travelling in staff cars**

Members of the school staff will not transport individual children in their cars at any time.

## **Communication**

Every effort will be made to enhance pupil-teacher communication. If pupils have concerns they will be listened to sympathetically. If teachers have to communicate with pupils on a one-to-one basis, they are requested to leave the classroom door open or request a colleague to attend.

## **Induction of Staff**

The DCP will be responsible for informing all new teachers and ancillary staff of the Albanian International School Child Protection Policy. All new teachers are expected to read and adhere to the Child Protection Policy.

## **Induction of Students**

All parents and children will be made aware of attendance rules and their implications. All new parents will be instructed in the school's enrolment policy, which outlines the procedures parents and children should use when contacting the school if there are absences or concerns of an educational/personal/family matter. Parents are encouraged to make an appointment with the class teacher/principal if they wish to discuss their child's progress. A copy of the school's Code of Behavior and Anti-Bullying Policy are available for download from the school's website.

## **Internet Safety**

It is the intention of the AIS Academic Director and staff to ensure that child protection concerns will be addressed in the school's Information and Communication Technology Policy.

## **Record Keeping**

Teachers will keep records on each child's reports using both the ALMA online student information system and the class registers. Roll books will be updated daily. Sensitive information regarding children will be shared on a need-to-know basis. All educational files of students who no longer attend the school are kept in a locked storage cabinet.

## **Supervision**

The school's supervision policy will be followed by all staff to ensure that there is comprehensive supervision of children at all breaks. The AIS Staff Handbook indicates agreed rules around break-times and procedures regarding teacher absences.

## **Visibility**

Teachers will ensure that children are visible in the school playground. Children will not be allowed to spend time in classrooms or toilets where they would not be under adult supervision. They are not to leave the school playground or to engage with adults who are outside of the school playground.

## Appendix B

### Reporting Form for Child Protection and Welfare Concerns

- Date of Report:
- Name of person reporting:
- Address of person reporting:
- Relationship of reporting person with the child concerned:
- Method of report (telephone call, personal call to office):
- Family Details:

#### Details of Child Concerned

- State whether you consider your report to indicate (a) suspected or actual child abuse or (b) need for family support, giving reasons:

	Suspect	Actual	Reasons
Physical Abuse			
Sexual Abuse			
Emotional Abuse			
Neglect			

- Name of Other Professionals Involved with Children and/or Parents/Guardians:

Public health nurse:

School doctor/nurse:

General practitioner:

Any other agency or professional involved (please describe the nature of any involvement):

#### Report Details

- Describe, as fully as possible the nature of the problem or incident being reported, giving details of times and dates of individual incidents, the circumstances in which they occurred, any other persons who were present at the time, and their involvement:

- Has any explanation been offered by the child, and/or parents/guardian, which would account for the current problem or incident? (Details)
- As far as possible, describe the state of the children's physical, mental and emotional well-being:
- If child abuse is being alleged, who is believed to be responsible for causing it? Include (if known):
  - Name:
  - Address:
  - Degree of contact with child:
  - Degree of contact with other children:
- Describe (in detail) any risks to which the children in this situation is/are believed to be exposed:
- How did this information come to your attention?
- What has prompted you to report your concern at this time?
- What evidence of harm exists at present?

- Are there any factors in the child and/or parents/guardians present situation, which may have relevance to the current concern? (for example, recent illness, bereavement, separation, addiction, mental health problem or other difficulty)
  
- Are there any factors in the child and/or parents/guardians situation which could be considered protective or helpful (for example, extended family or community support)?
  
- Has any action been taken in response to the current concern or incident? (Details)
  
- Are the child's parents/guardians aware that this concern is/may be reported to the authorities?
  
- Is there a need for urgent protective action at this point?
  
- Any other comments:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix C

Dear Parents/Guardians,

In recent years, as a society, we have become very aware of the problem of child abuse through neglect, emotional, physical or sexual abuse.

Each one of us has a duty to protect children. Teachers, who are the main caregivers to children outside the family, are particularly well placed to observe and monitor children for signs of abuse.

The Board of Directors of Albanian International School has adopted these procedures as school policy. This school policy is available on our website at [ais-tirana.org](http://ais-tirana.org). Consequently, if school staff suspect or are alerted to possible child abuse, they are obliged to refer this matter to the Albanian International School administration.

Yours faithfully,

Suzan Arrer,  
AIS Academic Director

Phone: +355 69 47 46 856

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# AIS Guidance for Safe Working Practice

## 1. Context

All adults who work with children and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults working in all settings to establish safe and responsive environments which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct.

## 2. 'Unsuitability'

The guidance contained in this document is an attempt to identify what behaviors are expected of adults who work with children and young people. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with children and young people.

## 3. Duty of Care

All adults who work with, and on behalf of children are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children and young people.

Whether working in a paid or voluntary capacity, these adults have a duty to keep children and young people safe and to protect them from sexual, physical and emotional harm. Children and young people have a right to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of children and young people. Failure to do so may be regarded as neglect.

The duty of care is in part, exercised through the development of respectful and caring relationships between adults and children and young people. It is also exercised through the behavior of the adult, which at all times should demonstrate integrity, maturity and good judgment.

Everyone expects high standards of behavior from adults who work with children and young people. When individuals accept such work, they need to understand and acknowledge the responsibilities and trust inherent in that role.

*This means that these guidelines:*

- apply to **all** adults working in all settings whatever their position, role, or responsibilities
- may provide guidance where an individual's suitability to work with children and young people has been called into question.

*This means that adults should:*

- have a clear understanding about the nature and content of this document
- discuss any uncertainties or confusion with their line manager
- understand what behaviors may call into question their suitability to continue to work with children and young people

*This means that adults should:*

- understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- always act, and be seen to act, in the child's best interests
- avoid any conduct which would lead any reasonable person to question their motivation and intentions
- take responsibility for their own actions and behavior

*This means that employers should:*

- ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored
- ensure that codes of conduct/practices are continually monitored and reviewed
- ensure that, where services or activities are provided by another body, the body concerned has

Employers also have a duty of care towards their employees. This requires them to provide a safe working environment for adults and provide guidance about safe working practices. Employers also have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. The Human Rights Act 1998 sets out important principles regarding protection of individuals from abuse by state organizations or people working for those institutions. Adults who are subject to an allegation should therefore be supported and the principles of natural justice applied.

An employer's duty of care and the adult's duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

#### **4. Confidentiality**

Adults may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances, they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in the child to do so. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned.

If an adult who works with children is in any doubt about whether to share information or keep it confidential he or she should seek guidance from AIS administration or designated DCP. Any actions should be in line with locally agreed information sharing protocols.

Whilst adults need to be aware of the need to listen to and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child young person under any circumstances.

Additionally, concerns and allegations about adults should be treated as confidential and passed to a senior manager without delay.

*appropriate safeguarding policies and procedures foster a culture of openness and support*

- *ensure that systems are in place for concerns to be raised ensure that adults are not placed in situations which render them particularly vulnerable*
- *ensure all adults have access to and understand this guidance and related, policies and procedures*
- *ensure that all job descriptions and person specifications clearly identify the competences necessary to fulfill the duty of care*

*This means that adults:*

- *should be clear about when information can be shared and in what circumstances it is appropriate to do so*
- *are expected to treat information they receive about children and young people in a discreet and confidential manner*
- *should seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of the*
- *need to know to whom any concerns or allegations should be reported*

## 5. Making a Professional Judgment

This guidance cannot provide a complete checklist of what is, or is not, appropriate behavior for adults in all circumstances. There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behavior to secure the best interests and welfare of the children in their charge. Such judgements, in these circumstances, should always be recorded and shared with a senior manager or if the adult does not work for an organization, with the parent or carer. In undertaking these actions individuals will be seen to be acting reasonably.

Adults should always consider whether their actions are warranted, proportionate, safe, and applied equitably.

## 6. Power and Positions of Trust

Because of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise because of this relationship.<sup>2</sup>

A relationship between an adult and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behavior which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust<sup>3</sup> with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

*This means that where no specific guidance exists, adults should:*

- *discuss the circumstances that informed their action, or their proposed action, with a senior manager, or with the parent/carer if not working for an organization*
- *report any actions which could be misinterpreted to their senior manager*
- *always discuss any misunderstanding, accidents, or threats with a senior manager*
- *always record discussions and reasons why actions were taken.*
- *record any areas of disagreement about course of action taken and if necessary referred to a higher authority*

*This means that adults should not:*

- *use their position to gain access to information for their own or others' advantage*
- *use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people*
- *use their status and standing to form or promote relationships which are of a sexual nature, or which may become so*

## 7. Propriety and Behavior

All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct to maintain the confidence and respect of the public in general and all those with whom they work.

There may be times, for example, when an adult's behavior or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behavior is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behavior.

Adults in contact with children and young people should therefore understand and be aware that safe practice also involves using judgment and integrity about behaviors in places other than the work setting.

The behavior of an adult's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to children and young people in the workplace.

## 8. Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression. However, adults should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work.

Adults who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake.

Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

*This means that adults should not:*

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.*
- *make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such*

*This means that adults should:*

- *be aware that behavior in their personal lives may impact upon their work with children and young people*
- *follow any codes of conduct deemed appropriate by their organization*
- *understand that the behavior and actions of their partner (or other family members) may raise questions about their suitability to work with children and young people*

*This means that adults should wear clothing which:*

- *is appropriate to their role*
- *is not likely to be viewed as offensive, revealing, or sexually provocative*
- *does not distract, cause embarrassment or give rise to misunderstanding*
- *is absent of any political or otherwise contentious slogans*
- *is not considered to be discriminatory and is culturally sensitive*

## 9. Personal Living Space

**No child or young person should be in or invited into, the home of an adult who works with them,** unless the reason for this has been firmly established and agreed upon with both parents/guardians and school administration.

Under no circumstances should children or young people assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.

## 10. Gifts, Rewards and Favoritism

The giving of gifts or rewards to children or young people should be part of an agreed policy for supporting positive behavior or recognizing particular achievements. In some situations, the giving of gifts as rewards may be accepted practice for a group of children, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan, recorded and discussed with senior manager and the parent or carer.

It is acknowledged that there are specific occasions when adults may wish to give a child or young person a personal gift. This is only acceptable practice where, in line with the agreed policy, the adult has first discussed the giving of the gift and the reason for it, with the senior manager and/or parent or carer and the action is recorded. Any gifts should be given openly and not be based on favoritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or groom a young person.

Adults should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favoritism or unfairness. Methods and criteria selection should always be transparent and subject to scrutiny.

Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

There are occasions when children, young people or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

*This means that adults should:*

- *be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations*
- *challenge any request for their accommodation to be used as an additional resource for the organization*
- ***be mindful of the need to maintain professional boundaries***
- *refrain from asking children and young people to undertake personal jobs or errands*

*This means that adults should:*

- *be aware of their organization's policy on the giving and receiving of gifts*
- *ensure that gifts received or given in situations which may be misconstrued are declared*
- *generally, only give gifts to an individual young person as part of an agreed reward system*
- *where giving gifts other than as above, ensure that these are of insignificant value*
- *ensure that all selection processes which concern children and young people are fair and that wherever practicable these are undertaken and agreed by more than one member of staff*

## 11. Infatuations

Occasionally, a child or young person may develop an infatuation with an adult who works with them. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behavior is above reproach.

An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with a senior manager or parent/carer so appropriate action can be taken to avoid any hurt, distress or embarrassment.

## 12. Communication with Children and Young People (including the Use of Technology)

Communication between children and adults, by whatever method, should take place **within clear and explicit professional boundaries**. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children to avoid any possible misinterpretation of their motives or any behavior which could be construed as grooming. **All communications between AIS and students/parents are to be done through the ALMA system only.** They should not give their personal contact details to children and young people including e-mail, home or mobile telephone numbers. Email or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based websites.

Internal email systems should only be used in accordance with the school's policy.

*This means that adults should:*

- *report and record any incidents or indications (verbal, written or physical) that suggest a child or young person may have developed an infatuation with an adult in the workplace*
- *always acknowledge and maintain professional boundaries*

*This means that the organization should:*

- *have a communication policy which specifies acceptable and permissible modes of communication*

*This means that adults should:*

- *not give their personal contact details to children or young people, including their mobile telephone number and details of any blogs or personal websites*
- *only use equipment e.g. mobile phones, provided by organization to communicate with children, making sure that parents have given permission for this form of communication to be used only make contact with children for professional reasons and in accordance with any organization policy*
- *recognize that text messaging is rarely an appropriate response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible*
- *not use internet or web-based communication channels to send personal messages to a child/young person*
- *ensure that if a social networking site is used, details are not shared with children and young people and privacy settings are set at maximum*

### 13. Social Contact

Adults who work with children and young people **should not seek to have social contact with them or their families**, unless the reason for this contact has been firmly established and agreed with senior managers, or where an adult does not work for an organization, the parent or carers. If a child or parent seeks to establish social contact, or if this occurs coincidentally, the adult should exercise her/his professional judgment in making a response but should always discuss the situation with their manager or with the parent of the child or young person. Adults should be aware that social contact in certain situations can be misconstrued as grooming.

Where social contact is an integral part of work duties, e.g. pastoral work in the community, care should be taken to maintain appropriate personal and professional boundaries. This also applies to social contacts made through interests outside of work or through the adult's own family or personal networks.

It is recognized that some adults may support a parent who may be in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the adult for support outside their professional role. This situation should be discussed with senior management and where necessary referrals made to the appropriate support agency.

### 14. Sexual Contact

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

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. 'Working Together to Safeguard Children'<sup>6</sup> defines sexual abuse as "forcing or enticing a child or young person

*This means that adults should:*

- *have no secret social contact with children and young people or their parents*
- *consider the appropriateness of the social contact according to their role and nature of their work*
- *always approve any planned social contact with children or parents with senior colleagues,*
- *advise senior management of any social contact they have with a child or a parent with whom they work, which may give rise to concern*
- *report and record any situation, which may place a child at risk or which may compromise the organization or their own professional standing*
- *be aware that the sending of personal communications such as birthday or faith cards should always be recorded and/or discussed with the line manager.*
- *understand that some communications may be called into question and need to be justified.*

*This means that adults should not:*

- *have sexual relationships with children and young people*
- *have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact*
- *make sexual remarks to, or about, a child/young person*
- *discuss their own sexual relationships with or in the presence of children or young people*

*This means that adults should:*

- *ensure that their relationships with children and young people clearly take place within the boundaries of a respectful professional relationship*

to take part in sexual activities, whether or not the child is aware of what is happening”.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favor upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behavior.

## 15. Physical Contact

Many jobs within the children's workforce require physical contact with children as part of their role. There are also occasions when it is entirely appropriate for other adults to have some physical contact with the child or young person with whom they are working. However, it is crucial that in all circumstances, adults should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.

Not all children and young people feel comfortable about physical contact, and adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Permission should be sought from a child or young person before physical contact is made. Where the child is very young, there should be a discussion with the parent or carer about what physical contact is acceptable and/or necessary.

When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Adults, nevertheless, should use their professional judgment at all times, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.

Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless there is explicit agreement on the need for, and nature of, that contact. This would then be part of a formally agreed plan or within the parameters of established, agreed and legal professional protocols on physical contact e.g. sport activities or medical procedures. Any such

- *take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanor and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.*

*This means that adults should:*

- *be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described*
- *never touch a child in a way which may be considered indecent*
- *always be prepared to report and explain actions and accept that all physical contact be open to scrutiny*
- *not indulge in 'horseplay'*
- *always encourage children, where possible, to undertake self-care tasks independently*
- *work within Health and Safety regulations*
- *be aware of cultural or religious views about touching and always be sensitive to issues of gender*
- *understand that physical contact in some circumstances can be easily misinterpreted*

*This means that organizations should:*

- *ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management*
- *make adults aware of relevant professional or organizational guidance in respect of physical contact with children and meeting medical needs of children and young people where appropriate*
- *be explicit about what physical contact is appropriate for adults working in their setting*

arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If an adult believes that their action could be misinterpreted, or if an action is observed by another as being inappropriate or possibly abusive, the incident and circumstances should be reported to the senior manager outlined in the procedures for handling allegations and an appropriate record made. Parents/carers should also be informed in such circumstances.

Where a child seeks or initiates inappropriate physical contact with an adult, the situation should be handled sensitively and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support given to the adult concerned.

It is recognized that some children who have experienced abuse may seek inappropriate physical contact. Adults should be particularly aware of this when it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to some actions being misinterpreted. In all circumstances where a child or young person initiates inappropriate physical contact, it is the responsibility of the adult to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior manager and the parent/carer.

## 16. Other Activities that require Physical Contact

Adults who work in certain settings, for example sports drama or outdoor activities will have to initiate some physical contact with children, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a child so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice.

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

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

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers, children and young people informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

## 17. Behavior Management

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

**Adults should not use any form of degrading treatment to punish a child.** The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards used should be part of a behavior management policy which is widely publicized and regularly reviewed.

*This means that adults should:*

- *treat children with dignity and respect and avoid contact with intimate parts of the body*
- *always explain to a child the reason why contact is necessary and what form that contact will take*
- *seek consent of parents where a child or young person is unable to do so because of a disability.*
- *consider alternatives, where it is anticipated that a child might misinterpret any such contact,*
- *be familiar with and follow recommended guidance and protocols*
- *conduct activities where they can be seen by others*
- *be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact*

*This means that organizations should:*

- *have up to date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behavior and conduct.*
- *ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.*

*This means that adults should:*

- *not use force as a form of punishment*
- *try to defuse situations before they escalate*
- *inform parents of any behavior management techniques used*
- *adhere to the organization's behavior management policy*
- *be mindful of factors which may impact upon a child or young person's behavior*

The use of corporal punishment is not acceptable and whilst there may be a legal defense for parents who physically chastise their children, this does not extend, in any circumstances, to those adults who work with or on behalf of children and young people.

Where children display difficult or challenging behavior, adults must follow the behavior policy outlined by their place of work, and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behavior management strategies have failed.

Where a child has specific needs in respect of particularly challenging behavior, a positive handling plan may be drawn up and agreed by all parties. Only in these circumstances should an adult deviate from the behavior management policy of the organization.

## **18. Use of Control and Physical Intervention**

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

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behavior if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned.

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

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

*e.g. bullying, abuse and where necessary take appropriate action*

*This means that the organizations should:*

- have in place appropriate behavior management policies*
- where appropriate, develop positive handling plans in respect of an individual child or young person*

*This means that adults should:*

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

*This means that organizations should:*

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

## 19. Children and Young People in Distress

For all adults working with children there will be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for example after a fall, separation from parent etc. Adults should use their professional judgment to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with a senior manager and parents/carers.

## 20. Intimate Care

Some job responsibilities necessitate intimate physical contact with children on a regular basis, for example assisting young children with toileting, providing intimate care for children with disabilities or in the provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice or guidance and/or be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of an agreed care plan. The emotional responses of any child to intimate care should be carefully and sensitively observed, and where necessary, any concerns passed to senior managers and/or parents/carers.

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible.

The views of the child should be actively sought, wherever possible, when drawing up and reviewing formal arrangements. As with all individual arrangements for intimate care needs, agreements between the child, parents/carers and the organization must be negotiated and recorded.

*This means the adult should:*

- *consider the way in which they offer comfort and reassurance to a distressed child and do it in an age-appropriate way*
- *be circumspect in offering reassurance in one-to-one situations, but always record such actions in these circumstances*
- *follow professional guidance or code of practice where available*
- *never touch a child in a way which may be considered indecent*
- *record and report situations which may give rise to concern from either party*
- *not assume that all children seek physical comfort if they are distressed*

*This means that adults should:*

- *adhere to the organization's intimate care guidelines or code of practice*
- *make other staff aware of the task being undertaken*
- *explain to the child what is happening*
- *consult with senior managers and parents/carers where any variation from agreed procedure/care plan is necessary*
- *record the justification for any variations to the agreed*
- *procedure/care plan and share this information with parents*
- *ensure that any changes to the agreed care plan are discussed, agreed and recorded.*

## 21. Personal Care

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Adults need to be vigilant about their own behavior, ensure they follow agreed guidelines and be mindful of the needs of the children and young people with whom they work.

## 22. First Aid and Administration of Medication

It is expected that adults working with children and young people should be aware of basic first aid techniques. It is not however, a contractual requirement and whilst adults may volunteer to undertake such tasks, they should be suitably trained and qualified before administering first aid and/or any agreed medication.

When administering first aid, wherever possible, adults should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered.

In circumstances where children need medication regularly a health care plan should have been established to ensure the safety and protection of children and the adults who are working with them. Depending upon the age and understanding of the child, they should where appropriate, be encouraged to self administer medication or treatment including, for example any ointment, use of inhalers.

*This means that adults should:*

- *avoid any physical contact when children are in a state of undress*
- *avoid any visually intrusive behavior*
- *where there are changing rooms announce their intention of entering*

*This means that adults should not:*

- *change in the same place as children*
- *shower or bathe with children*
- *assist with any personal care task which a child or young person can undertake by themselves*

*This means that the organizations should:*

- *ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention*
- *ensure there are trained and named individuals to undertake first aid responsibilities*
- *ensure training is regularly monitored and updated*
- *always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication*

*This means that adults should:*

- *adhere to the organization's policy for administering first aid or medication*
  - *comply with the necessary reporting requirements*
  - *make other adults aware of the task being undertaken*
  - *explain to the child what is happening.*
  - *always act and be seen to act in the child's best interests*
  - *report and record any administration of first aid or medication*
  - *have regard to any health plan which is in place*
- always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities*

### 23. One-to-One Situations

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

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

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

One-to-one situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one-to-one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of children and young people and the adults who work with them.

There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one-to-one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.

Meetings with children and young people outside agreed working arrangements should not take place without the agreement of senior managers and parents or carers.

*This means that adults should:*

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

## 24. Home Visits

**Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend.** If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a senior manager and the parents or carers and a clear justification for such arrangement is agreed and recorded.

*This means that adults should:*

- *agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social workers*
- *always make detailed records including times of arrival and departure and work undertaken*
- *ensure any behavior or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken*

*This means that employers should:*

- *ensure that they have home visit and lone-working policies of which all adults are made aware. These should include arrangements for risk assessment and management*
- *ensure that all visits are justified and recorded*
- *ensure that adults are not exposed to unacceptable risk*
- *ensure that adults have access to a mobile telephone and an emergency contact person*

## 25. Transporting Children and Young People

There will be occasions when adults are expected or asked to transport children as part of their duties. Adults, who are expected to use their own vehicles for transporting children, should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Adults should also be aware of current legislation and adhere to the use of car seats for younger children. Where adults transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV7- staff should ensure that they have an appropriate license and insurance to drive such a vehicle.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

*This means that all organizations:*

- *should have appropriate policies for transporting children and young people*

*This means that adults should:*

- *ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgment and/ or ability to drive*
- *be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer*
- *record details of the journey in accordance with agreed procedures*
- *ensure that their behavior is appropriate at all times*
- *ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven*

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

## 26. Trips and Outings

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

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

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace.

## 27. Photography and Videos

Working with children and young people may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well being of children and young people. Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose.

Careful consideration should be given as to how activities involving the taking of images are organized and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media, or on the Internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

*ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned*

*This means that adults should:*

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

*This means that adults should:*

- *be clear about the purpose of the activity and about what will happen to the images when the activity is concluded*
- *be able to justify images of children in their possession*
- *avoid making images in one-to-one situations or which show a single child with no surrounding context*
- *ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.*
- *only use equipment provided or authorized by the organization*
- *report any concerns about any inappropriate or intrusive photographs found*
- *always ensure they have parental permission to take and/or display photographs*

It is not appropriate for adults to take photographs of children for their personal use.

*This means that adults should not:*

- *display or distribute images of children unless they have consent to do so from parents/carers*
- *use images which may cause distress*
- *use mobile telephones to take images of children*
- *take images 'in secret', or taking images in situations that may be construed as being secretive.*

## **28. Access to Inappropriate Images and Internet Usage**

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven.

*This means that organizations should*

- *have clear e-safety policies in place about access to and use of the internet*
- *make guidance available to both adults and children and young people about appropriate usage.*

Adults should not use equipment belonging to their organisation to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with children.

*This means that adults should:*

- *follow their organization's guidance on the use of IT equipment*
- *ensure that children are not exposed to unsuitable material on the internet*
- *ensure that any films or material shown to children and young people are age appropriate*

Adults should ensure that children and young people are not exposed to any inappropriate images or web links. Organizations and adults need to ensure that internet equipment used by children have the appropriate controls with regards to access. e.g. personal passwords should be kept confidential.

## 29. Sharing Concerns and Recording Incidents

Individuals should be aware of their organization's child protection procedures, including procedures for dealing with allegations against adults. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance. Adults who are the subject of allegations are advised to contact their professional association.

In the event of any allegation being made, to someone other than a manager, information should be clearly and promptly recorded and reported to a senior manager without delay.

Adults should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with children and young people so that appropriate support can be provided or action can be taken.

It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.

*This means that adults:*

- *should be familiar with their organization's system for recording concerns*
- *should take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the workplace*

*This means that organizations:*

- *should have an effective, transparent, and accessible system for recording and managing concerns raised by any individual in the workplace*