



CHILD PROTECTION POLICY

INTRODUCTION

This policy applies to all activities, across the organisation, in relation to children and young people from birth to 18 years, with whom the organisation has contact or knowledge.

Responsibility for ensuring that this Policy is implemented and reviewed rests with the Board of Trustees, who may decide to delegate these powers to certain employees.

This Policy is in line with legislation and current guidelines. Please refer to 'Multi-Agency Child Protection Procedures' if necessary.



[Click here to access Multi-Agency Child Protection Procedures](#)

We will ensure that:

- the welfare of the child is paramount.
- all children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse.
- all suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.

- all employees (paid/unpaid) have a responsibility to report concerns to the appropriate individual.
- All staff use a GIRFEC approach, in line with the Children & Young People (Scotland) Act 2014 in order to improve outcomes and support the wellbeing of children and young people by offering the right help at the right time from the right people. All staff will support children and their parent(s) to work in partnership with the services that can help them.

Staff/volunteers are not trained to investigate situations of abuse or to decide if abuse has occurred.

1. POLICY STATEMENT

We recognise our duty of care to safeguard all children involved with us from harm. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account. We will ensure the safety and protection of all children involved in the organisation through adherence to these Child Protection guidelines.

For the purpose of this Policy, a child is defined as a person under the age of 18.

The organisation has identified 3 Child Protection Officers. They are contactable at anytime with a Child Protection concern:

Shirley Thomson (Project Manager) CPO: Simply Play
Mobile 0796 036 2230

Simon Henderson (Chief Executive Officer) CPO: Broxburn Projects
Mobile 0781 234 0008

Angela Douglas (Projects Manager) CPO: Armadale Projects
Mobile 0790 375 1165

1.1 POLICY AIMS

The aim of this Child Protection Policy is to promote good practice:

- providing children and young people with appropriate safety and protection whilst in our care.
- allow all employees /volunteers to make informed and confident responses to specific child protection issues.

1.2 PROMOTING GOOD PRACTICE

Child abuse can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Abuse can occur within many situations including the home, school and the organisation environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. All employees will have regular contact with young people and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document.

Good Practice Guidelines:

All employees are encouraged to demonstrate exemplary behaviour in order to promote children's welfare and reduce the likelihood of allegations being made.

The following are examples of how we expect staff to act (this list is not exhaustive):

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Treating all children / young people equally, and with respect and dignity and ensure they are listened to.
- Always putting the welfare of each young person first, before winning or achieving goals.
- Maintaining a safe and appropriate distance with children / young people. For example it is not appropriate for staff or volunteers to have an intimate relationship with a child, however staff can provide comfort to children, where appropriate e.g. if a child is hurt or upset and requests a cuddle
- Staff and children should use separate toilets
- If toileting outdoors, children must be shown an appropriate and dignified space that maintains privacy.
- When taking children to the toilet staff should:
 - Inform a colleague where and with whom they are going.
 - Provide assistance appropriate to the child's age and/or abilities, e.g. full nappy change for babies, assisting toddlers with buttons/belts or providing the materials for a school child to clean themselves following an accident.
 - Be sensitive to older children's "embarrassment" factor, e.g. use a same sex worker if available or "stand guard" outside the toilet whilst a child is cleaning/changing.
- Building balanced relationships based on mutual trust which empowers children / young people to share in the decision-making process.

- Use reasonable contact to separate children who are physically fighting or to stop a child from physically assaulting another child or member of staff
- Making activities fun, enjoyable and promoting fairness.
- Being an excellent role model - this includes not smoking or drinking alcohol in the company of children/young people or discussing inappropriate material in front of them.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of children / young people.
- Communicate with parents / carers as much as possible informing them of any incidents involving their child or sharing any of their child's achievements or concerns, as appropriate
- Secure parental consent in writing to enable the administration of emergency first aid and/or other medical treatment.
- Keeping a written record of any injuries that occur, along with the details of any treatment given and reporting to parents.

Practices to Be Avoided:

The following should be **avoided** except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in charge in the club or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session:

- When it is identified that children will receive 1:1 support, ensure all lone working procedures are followed.

Practices Never To Be Sanctioned:

You should never:

- Engage in sexually provocative games or activities.
- Share a bedroom with a child one-to-one. An exception to this would be where there is planned communal accommodation and this has been risk assessed.
- Initiate intimate physical contact with a child.
- Allow or engage in any form of inappropriate touching with a child, e.g. ensure that contact made for first aid is required, done with the child's prior knowledge/permission, and carried out in an open environment, avoiding private / unobservable situations.
- Use physical punishment or chastisement as a means of discipline.
- Discuss confidential information in front of children.
- Discuss personal staff issues in front of children.
- Allow children to use inappropriate language unchallenged.

- Make sexually suggestive comments to a child, even in fun.
- Bully or ridicule a child.
- Fail to act upon and record any allegations made by a child.
- Do things of a personal nature for children that they can do for themselves.
- In your work capacity, invite or allow children to stay with you at your home unsupervised.

N.B. It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, particularly if they are very young or are disabled. These tasks should only be carried out with the full understanding and consent of parents and the children involved.

There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

Incidents That Must Be Reported/Recorded:

If any of the following occur you should report this immediately to the Child Protection Officer (CPO) and record the incident. **These details are in Appendix I.**

You should also ensure the parents of the child are informed:

- if you accidentally hurt a child
- if he/she seems distressed in any manner
- if a child appears to be sexually aroused by your actions
- if a child misunderstands or misinterprets something you have done.

1.3 USE OF PHOTOGRAPHIC / FILMING EQUIPMENT AT EVENTS

We recognise the value of recording children's activities and events for publicity and parents own records. Staff will therefore seek parents'/carers' permission to take and use photographs for these purposes. At all times the wishes of parents'/carers will be taken into account.

All photographs/film must remain under the control of the organisation and should only be stored on company equipment. Staff must not use their own equipment (eg. cameras, mobile phones or memory sticks) to take, or store, photographs and film, unless this has been pre-approved by the Project Manager. At no time is it acceptable for staff to retain images of children for personal use.

Staff who are authorised to use their own equipment to take images, must upload them to the specified cloud space and delete all of these from their device, at the end of everyday unless permission is received from the Project Manager. The Project Manager will check they understand the system and randomly check equipment to ensure the policy is maintained. A condition of this approval will be the employee's consent to have their equipment checked.

Any staff member using their own equipment to take images/video without this pre-approval, retaining images on their own device or uploading to a personal website or social network page, will be subject to disciplinary action.

1.4 USE OF THE INTERNET

Use of the Internet by children/young people will be in line with our Internet Safety policy

2. RECRUITMENT AND TRAINING OF STAFF / VOLUNTEERS

We recognise that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children in our settings.

Pre-selection checks will include the following:

- All volunteers/staff should complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- The applicant must join or be a member of the PVG Scheme.
- Two references, including one regarding previous work with children if applicable to the role.
- Evidence of identity (passport or driving licence with photo).
- Membership of SSSC to be confirmed if required by the role or be a condition of any job offer

Interview and Induction:

All employees (and volunteers) will be required to undergo an interview carried out to acceptable protocol and recommendations

- Their qualifications should be substantiated.
- The job requirements and responsibilities should be clarified.

Employment will not commence until all pre-selection checks and interview have been satisfactorily completed.

All employees and volunteers will receive an induction, during which:

- Child protection procedures are explained and training needs are identified.
- They should read and sign up to our policies and procedures.

Training:

We will ensure that all staff are suitably qualified and trained to carry out their responsibilities effectively. With regard to child protection all staff must undergo specific child protection training appropriate to their level of responsibility. Training will also be a regular agenda item on staff support & supervision sessions as well as their annual appraisal. Staff will be expected and supported, to take up CPL opportunities throughout the year.

3. ABUSE

Child abuse or maltreatment constitutes all forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment, or exploitation, resulting in actual or potential harm in the child's health or development.

Children may be in need of protection where their basic needs are not being met, in a manner appropriate to their stage of development, and they will be at risk from avoidable acts of commission or omission on the part of their parent(s), sibling(s) or other relative(s), or a carer (i.e. the person(s) while not a parent who has actual custody of a child), other individuals or complete strangers.

There are varied settings in which abuse can occur. Whilst the setting in which abuse occurs may require special consideration, and professionals should demonstrate and record that they have made such considerations, it is crucial that **all** suspected abuse **must** be addressed primarily as a child protection matter. Likewise children who themselves abuse other children present particular challenges for professionals. In specific circumstances the relevant protocol should be consulted in conjunction with these Procedures.

3.1 CATEGORIES OF ABUSE

To define an act (of commission or omission) as abusive and/or presenting future risk a number of elements must be taken into account.

These include demonstrable or predictable harm to the child, which must have been avoidable because of action or inaction by the parent or other carer. The following are the standard categories of abuse, which, although presented as separate definitions, in practice may overlap. This list is not designed to be completely definitive or exhaustive.

Physical Injury:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical Neglect:

Neglect is 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.

Before a child is born, neglect may occur 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).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Non-organic Failure to Thrive:

Failure to meet expected weight and growth norms or developmental milestones, which does not have a basis in a hereditary or medical condition, as medically diagnosed. In its extreme form children can be at serious risk from the effects of malnutrition, lack of nurturing and stimulation. This can lead to serious long term effects such as greater susceptibility to serious childhood illnesses, reduction in potential stature and, with young children in particular, the results may be life threatening over a relatively short period.

Emotional Abuse:

Emotional abuse is the **persistent** emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another (including being exposed to domestic abuse). It may involve serious bullying, 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, though it may occur alone.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include noncontact activities, such as involving children in looking at, or in the production of sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Domestic Abuse:

Domestic abuse can be perpetrated by partners or ex partners and can include physical abuse and mental and emotional abuse. Children living with domestic abuse are at increased risk of harm and the impact on a child will vary, depending on a number of factors such as the age of the child, the frequency of the abuse, the length and severity of the abuse and the degree of control.

The best way to protect the child is by early intervention by skilled Services staff.

Parental Substance Misuse:

The risks to children of mis-using parents are well researched. Mis-use can lead impact on parent's ability to be consistent, warm and emotionally responsive to their child

3.2 CONFIDENTIALITY

The following is extracted from our Confidentiality Policy:

We respect individuals' rights to confidentiality. This means that, in general, no information, given in confidence to a member of staff will be divulged to any person outside the organisation without that person's agreement. However, no individual can be guaranteed complete confidentiality.

Confidentiality resides with the organisation, not an individual employee. This means that an *appropriate* discussion between an employee & their Line Manager will not constitute a breach of policy. Nevertheless, discretion should be used in passing on information received in confidence, respecting the confidant's wishes as far as possible.

It is not appropriate for staff to pass on confidential information to their peers.

As well as this all staff MUST use a GIRFEC approach, in line with the Children and Young People (Scotland) Act 2014 and its supporting guidance when considering sharing information with the Named Person if it could promote, support or safeguard a child and could be shared in line with the Data Protection Act and other law.

Limits on Confidentiality:

No child disclosing abuse can be treated in confidence. Any disclosure must be passed on as per Child Protection Policy.

Authorised Breaches of Confidentiality:

In addition to legal requirements, confidentiality will only be breached if an adult or child is perceived to be in a dangerous/life threatening situation or is likely to be a serious danger to others. The following situations would constitute an authorised breach of confidentiality:

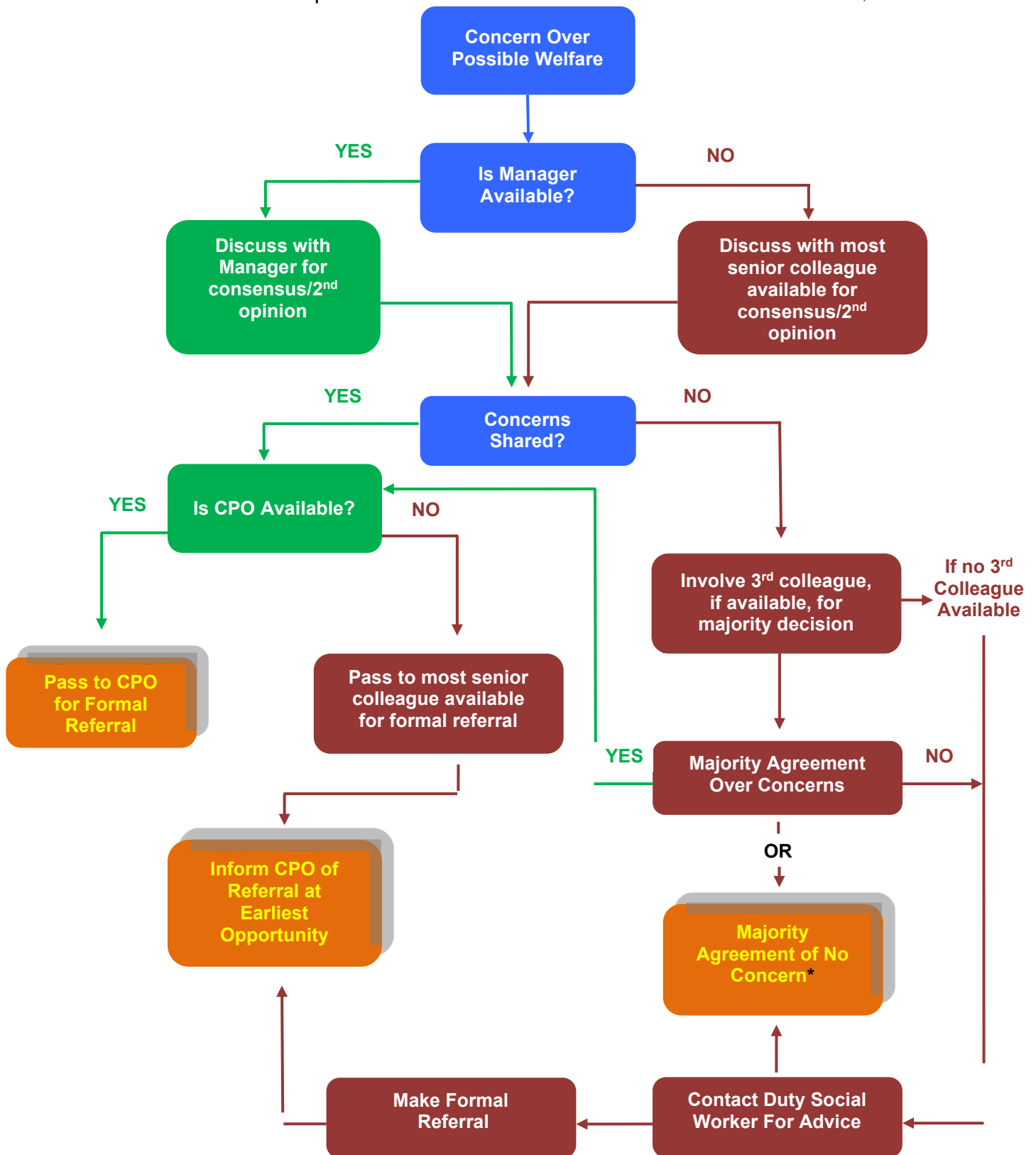
- A child or adult is at that moment physically or emotionally so damaged that immediate medical treatment is necessary
- There are indications of real danger or physical/emotional damage or death if a child/adult returns to an abusive situation.
- An adult/young person is threatening suicide or appears to have already attempted suicide. All suicide threats should be taken seriously and not assumed to be 'attention seeking'.
- An individual is threatening to kill or severely damage another individual.

3.3 RESPONDING TO ALLEGATIONS /SUSPICIONS

It is not the responsibility of anyone working for us, in a paid or unpaid capacity, to decide whether or not child abuse has taken place.

Anyone who has concerns about a child or children should, without delay escalate within the organisations and contact either the local authority social services, NHS Health Services or Police Scotland.

We assure all staff/volunteers that we will fully support and protect anyone whistleblowing, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.



*** NB: If agreement is reached that there is no concern requiring referral the initial indicator(s), discussions, decision and reasons should all be recorded and passed to the CPO or Senior Worker.**

Throughout the above process staff are expected to support each other and to be as objective and sensitive as possible whilst going through the above stages.

Children must be listened to and supported throughout every stage of a disclosure and/or referral process. Parents must not be approached or notified of any initial concerns regarding their child and consideration must be given to the safety of any child involved in the above process prior to any formal referral.

Referrals should be made to either Social Work or Police on the usual emergency contact numbers.

Refer to Social Services:
Livingston - 01506 282252
Bathgate - 01506 776700
Broxburn - 01506 775666
Social Care Emergency Team
01506 281 028/029
or
Police Scotland on
Non emergency: 101
Emergency: 999

If a referral is made, the Care Inspectorate must be informed via the eforms system.

3.4 ALLEGATIONS AGAINST STAFF

We emphasise the need to treat any allegation of abuse most seriously and expect all staff to be aware of their position of trust and the organisation's requirement to protect children at all times. The organisation also recognises, however, that any allegation made against a member of staff is likely be distressing and stressful for the individual involved and following investigation, may be established as unfounded. At all times management will be expected to handle any allegations and investigations tactfully and sensitively and to appropriately support all parties involved.

Any allegation of abuse made against any person working for the organisation, whether paid or unpaid, or a member of the Board, by a child or parent will result in the following procedure:

- The person receiving the complaint will immediately contact our CPO, or most senior available Manager should the CPO be unavailable.
- In the case of an allegation against the CPO the referral should be made to the CEO.
- On receipt of the complaint, the CPO themselves, or their appointed Manager, will immediately investigate, to decide if the allegation may have occurred.
- If appropriate, Social Services will be informed to appraise them of the situation. Normally this will be by informal channels but if there is a criminal allegation, the contact will be formal to the Duty Social Worker and also to the Police.
- The CPO will then inform the person against whom an allegation has been made as soon as possible - **unless** there appears to be a case that this might prejudice a criminal investigation, which may require consultation with the police to ascertain.
- The course of action to be taken from thereon will be decided by the nature of the allegation(s).

If a criminal allegation is made, e.g. of sexual abuse or impropriety, physical assault, or inappropriate behaviour, the CPO, or their appointed Manager, may feel it appropriate to activate the Disciplinary Procedure and suspend the person from any activity in the organisation under the heading of alleged gross misconduct. This action may be taken to protect the child and/or the employee. Suspension may be without pay, should the evidence appear strong enough to justify the matter.

If the allegation is not criminal, the CPO, or their appointed Manager, will gather as much detail from available sources of information as possible, by way of investigation. Where appropriate, they should consider whether suspension, or temporary relocation, of the worker is appropriate and act on this. This may include a situation, which, though non-criminal, could also lead to a decision of gross misconduct.

The CPO will keep the organisation's Management and Trustees informed of the progress of the case and recommend appropriate courses of action either disciplinary or criminal:

- To treat the matter as a disciplinary issue, either as misconduct or gross misconduct, with associated rights of appeal.
- To dismiss the allegations as unfounded or to make such other non-disciplinary recommendations as are appropriate. The Management or Board shall consider such recommendations and report to the next meeting of the Board any action taken.
- The person against whom such non-criminal allegations are made should have the opportunity to give an explanation or answer to any allegation at an interview conducted by the CPO, which should be recorded.

- Any suspension will remain in force until completion of the investigation process and a decision to discipline, dismiss or reinstate the person.
- The person suspended will be advised by the CPO of whom they can communicate with, where and when, during the period of their suspension on matters relating to their employment.
- During suspension the accused will not be allowed on project property, to make any contact with the child involved or their family or to speak to any of their colleagues with regard to the case.
- If legal proceedings result in the conviction of the person for a serious offence involving a child, the Management or Board of Simply Play shall consider any report or information from the police and/or social services and shall recommend to the Board the appropriate course of action up to and including instant dismissal. If the proceedings do not result in a conviction but there is evidence to suggest misconduct, disciplinary action may still be taken.
- Any matters resulting in a disciplinary outcome will include notification to the Care Inspectorate and SSSC.

In the case of any dismissal (or resignation before dismissal) or redeployment away from children by a member of staff (or volunteer), the Chief Executive will be required to refer the case to the Scottish Government's "Disqualified from Working with Children List", in accordance with the Protection of Children (Scotland) Act 2003.

3.5 SUPPORT TO DEAL WITH THE AFTERMATH OF ABUSE

- Consideration should be given to the kind of support that children, parents and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process.

Appendix 1

CONTACT NUMBERS

Play Works CPO's. If your venue CPO is not available contact any CPO. If no CPO's are available contact the CEO.

Angela Douglas (Projects Manager) CPO
Mobile 0790 375 1165

Simon Henderson (Chief Executive Officer)
Mobile 0781 234 0008