



Safer Working Practice.

A guide for staff working with children and young people.



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I. Introduction

This document is based on 'Guidance for safer Working Practice for Adults who work with Children and young people', originally published by the Department for Children, Schools and Families (DCSF) which is now the Department for Education.

This guidance is designed to give an overview of how to work safely with young people and you will find the whole document useful in your daily work, whatever your role within the company.

The Aurora Group is adopting this guidance as the basis for its 'Staff Code of Conduct'.

Children and adults at risk from abuse

Safeguarding and protecting children and adults from harm is everyone's responsibility.

There is a legal and moral duty on staff to take all reasonable steps to ensure the health, safety and wellbeing of people for whom they have a responsibility. This may be during activities, in discussion or as they become aware of a circumstance that may cause harm. This duty extends to those who do not work directly with children and adults in our services and therefore this guidance is relevant to everyone.

If you are worried that a child or adult in our services may be at risk of abuse or harm you must to follow Aurora's safeguarding policy and procedures for the service. You will have seen this during induction, however, it is a good idea to remind yourself regularly of its contents as things do change from time to time. Copies are widely available or you can contact your line manager, HR, senior managers or Group Quality and Governance Manager. If you need further assistance contact your HR team or email governance@the-aurora-group.com.



II. Purpose of guidance

It is important that all staff understand where the nature of their work and related responsibilities place them in a position of trust. This guidance provides clear advice on appropriate and safe behaviours.

The guidance aims to:

- ✓ Keep Children and Young People safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided
- ✓ Assist staff to work safely and responsibly and to monitor their own standards and practice
- ✓ Support managers in setting clear expectations for behaviour and/or codes of practice relevant to the services being provided
- ✓ Support managers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken
- ✓ Minimise the risk of misplaced or malicious allegations made against staff.
- ✓ Reduce incidences of positions of trust being abused or misused

Whilst every attempt has been made to cover a wide range of situations it's not possible for any guidance to cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given by your employer. It is expected that in these circumstances staff will always advise their senior colleagues of the justification for any such action already taken or proposed.

It is recognised that the vast majority of people who work with children and adults act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for those in their care. Achieving these aims is not always straightforward, as much relies on interactions between young people and staff, where tensions and misunderstandings can occur. This document aims to reduce the risk of these.

However, some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm others. Equally there could be allegations made which are false or misplaced and may arise from differing perceptions of the same event. When they occur, they are inevitably distressing and difficult for all concerned. It is essential that all possible steps are taken to safeguard vulnerable people and ensure that the adults working with them do so safely.



III. Underpinning principles

- The welfare of the young person is paramount
- It is the responsibility of staff to safeguard and promote the welfare of people who use our services
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work, in an open and transparent way
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff and managers should continually monitor and review practice to ensure this guidance is followed

IV. Definitions

For ease of reading, references will be made to 'setting'. This term encompasses all Aurora Services including schools, colleges and residential accommodation.

Although the original documentation published by the Department for Education (DfE) refers to Children and young people, we are using the term 'young person' to refer to all children and adults who use our services, whether they are accessing Education or not. References made to staff refer to all those who work with young people at any Aurora establishment, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by Aurora e.g. agency staff, self-employed clinical staff, consultants or volunteers, administrative and other staff.

The term 'allegation' means where it is alleged that a person who works with a young person has:

- behaved in a way that has harmed a young person, or may have harmed a young person;
- possibly committed a criminal offence against or related to a young person; or,
- behaved towards a child or young person in a way that indicates they may pose a risk of harm to young people.

References are made in this document to legislation and statutory guidance which differ, dependent on the setting or alter over time. However, the behavioural principles contained within the document remain consistent so, wherever possible, such references have been removed in order that the document does not appear to quickly become out of date or to apply only to certain staff or settings.

For young people over the age of 18, it may not be appropriate to always share information without their consent. Consideration must be taken of the young person's views and opinions along with their capacity to make a decision about who to be informed. Whilst we foster a culture of openness, it may not always be appropriate to share all information with parents, where the young person is also an adult.

Guidance by area

Introduction

Staff have a crucial role to play in the lives of young people. This guidance has been produced to help them establish the safest possible learning, living and working environments, which safeguard young people and reduce the risk of them being falsely accused of improper or unprofessional conduct.

This means that these guidelines:

- apply to all staff working for the Aurora Group whatever their position, role or responsibilities

Status of document

This document should inform and assist leaders and managers to develop and review their guidelines on safer working practices. It may be used as reference by managers when responding to allegations made against staff. This is not statutory guidance.

Responsibilities

Staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard young people. All staff have a responsibility to keep people who use our services safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns.

People who use our services have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct. The safeguarding culture of a service is, in part, exercised through the development of respectful, caring and professional relationships between staff and people who use our services and behaviour by staff that demonstrates integrity, maturity and good judgement. The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of young people. When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.

Aurora has a duty towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff. Legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. Aurora's Health and Safety duties and the staffs' responsibilities towards young people should not conflict. Safe practice can be demonstrated through the use and implementation of these guidelines.

This means that staff 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 young person'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 behaviour

This means that managers should:

- promote a culture of openness and support
- ensure that systems are in place for concerns to be raised
- ensure that staff are not placed in situations which render them particularly vulnerable
- ensure that all staff are aware of expectations, policies and procedures

	<ul style="list-style-type: none"> • ensure that appropriate safeguarding and child protection policies and procedures are distributed, adopted, implemented and monitored
<p>Making professional judgements</p> <p>This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a person using our services which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the people in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager. Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.</p>	<p>This means that where no specific guidance exists staff should:</p> <ul style="list-style-type: none"> • discuss the circumstances that informed their action, or their proposed action, with their line manager or, where appropriate, the service's designated safeguarding lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted • always discuss any misunderstanding, accidents or threats with the Head teacher, registered manager or designated safeguarding lead or person in a similar role • always record discussions and actions taken with their justifications • record any areas of disagreement and, if necessary refer to another agency/the LA/Ofsted/CQC/other Regulatory Body
<p>Power and positions of trust and authority</p> <p>As a result of their knowledge, position and/or the authority invested in their role, all those working with young people in an Aurora service are in a position of trust in relation to people who use our services. The relationship between a person working with young people is one in which the staff has a position of power or influence. It is vital for staff to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence. The potential for exploitation and harm of vulnerable people who use our services means that staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident. Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that</p>	<p>This means that staff should not:</p> <ul style="list-style-type: none"> • use their position to gain access to information for their own advantage and/or a young person's or family's detriment • use their power to intimidate, threaten, coerce or undermine people who use our services • use their status and standing to form or promote relationships with people who use our services which are of a sexual nature, or which may become so

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. The law is less clear where the young person is over 18, however, it is likely that the matter will be referred to the police and will definitely be investigated by the Aurora Group.

Confidentiality

The storing and processing of personal information is governed by the General Data Protection Regulations. Aurora has a GDPR Data Protection Policy so that, when considering sharing confidential information, those principles should apply. Staff may have access to confidential information about people who use our services and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the young person. Records should only be shared with those who have a legitimate professional need to see them. Staff should never use confidential or personal information about a young person or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the young person. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.

In circumstances where the young person's identity does not need to be disclosed the information should be used anonymously. There are some circumstances in which a member of staff may be expected to share information about a young person, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities. If a young person – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow Aurora's safeguarding procedures.

The member of staff should not promise confidentiality to a young person or parent, but should give reassurance that the information will be treated sensitively. If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the Safeguarding Lead in their setting. Any media or legal enquiries should be passed to senior management.

Standards of behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people. They should adopt high

This means that staff:

- need to know the name of their Safeguarding Lead (known as DSL in education settings) and be familiar with LSCB and LSAB procedures and guidance
- are expected to treat information they receive about people who use our services and families 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 them
- need to be clear about when information can/ must be shared and in what circumstances
- need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported
- need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure

This means that staff should not:

- behave in a manner which would lead any reasonable person to question their suitability to work

standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work. There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or young people or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of young people, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in -, prohibition from teaching, a bar from engaging in regulated activity, or action by another relevant regulatory body.

The Childcare (Disqualification) Regulations 2009 set out grounds for disqualification under the Childcare Act 2006 where the person or a person living in the same household or employed in the same household meets certain criteria set out in the Regulations. For example, an individual will be disqualified where they have committed a relevant offence against a child; been subject to a specified order relating to the care of a child; committed certain serious sexual or physical offences against an adult; been included on the DBS barred list; been made subject to a disqualification order by the court; previously been refused registration as a childcare provider or provider or manager of a young people's home or had such registration cancelled.

A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare. Services are also prohibited from employing a disqualified person.

Dress and appearance

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner, which could be viewed, as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

with young people or to act as an appropriate role model

- make, or encourage others to make sexual remarks to, or about, a young person
- use inappropriate language to or in the presence of people who use our services
- discuss their personal or sexual relationships with or in the presence of people who use our services
- make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such

This means that staff should:

- be aware that behaviour by themselves, those with whom they share a household, or others in their personal lives, may impact on their work with young people
- understand that a person who provides Early Years education or Childcare may be disqualified because of their "association" with a person living or employed in the same household who is disqualified.

This means that staff should wear clothing which:

- promotes a positive and professional image
- 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

	<ul style="list-style-type: none"> • is not considered to be discriminatory • is compliant with professional standards
<p>Gifts, rewards, favouritism and exclusion</p> <p>Aurora has policies in place regarding the giving of gifts or rewards to people who use our services and the receiving of gifts from them or their parents/carers and staff should be aware of and understand what is expected of them. Staff need to take care that they 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 people who use our services or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.</p> <p>Similarly, it is inadvisable to give personal gifts to people who use our services or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return. Any reward given to a young person should be in accordance with agreed practice, consistent with the service or setting's behaviour management policy, recorded and not based on favouritism.</p> <p>Staff should exercise care when selecting young people for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when people who use our services are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.</p>	<p>This means that staff should:</p> <ul style="list-style-type: none"> • be aware of and understand Aurora's relevant policies, e.g. rewarding positive behaviour • ensure that gifts received or given in situations which may be misconstrued are declared and recorded • only give gifts to a young person as part of an agreed reward system • where giving gifts other than as above, ensure that these are of insignificant value and given to all people who use the service equally • ensure that all selection processes of people who use the service are fair and these are undertaken and agreed by more than one member of staff • ensure that they do not behave in a manner which is either favourable or unfavourable to individual people who use our services
<p>Infatuations and 'crushes'</p> <p>All staff need to recognise that it is not uncommon for people who use our services to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Head teacher, registered manager or safeguarding lead. In this way, appropriate early intervention can be taken which can prevent</p>	<p>This means that staff should:</p> <ul style="list-style-type: none"> • report any indications (verbal, written or physical) that suggest a young person may be infatuated with a member of staff • always maintain professional boundaries <p>This means that managers should:</p> <ul style="list-style-type: none"> • put action plans in place where concerns are brought to their attention

escalation and avoid hurt, embarrassment or distress for those concerned.

The Head teacher or senior manager should give careful thought to those circumstances where the staff member, young person and where appropriate, their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the young person and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

Social contact outside of the workplace

It is acknowledged that staff may have genuine friendships and social contact with parents or family members of people who use our services, independent of the professional relationship. Staff should also be aware that professionals who sexually harm young people often seek to establish relationships and contact outside of the workplace with both the young person and their parents, in order to 'groom' the adult and the child and/or create opportunities for sexual abuse. It is also important to recognise that social contact may provide opportunities for other types of grooming such as for sexual exploitation or radicalisation. Staff should recognise that some types of social contact with people who use our services or their families could be perceived as harmful or exerting inappropriate influence on young people, and may bring the setting into disrepute (e.g. attending a political protest, circulating propaganda).

If a young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement. This also applies to social contacts made through outside interests or the staff member's own family. Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

Communication with young people (including the use of technology)

In order to make best use of the many educational and social benefits of new and emerging technologies, people who use our services need opportunities to use and explore the digital world. E-safety risks are posed more by behaviours and values than the technology itself. Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and the acceptable use policy which

This means that staff should:

- always approve any planned social contact with people who use our services or parents with senior colleagues, for example when it is part of a reward scheme
- advise management of any regular social contact they have with a young person which could give rise to concern
- refrain from sending personal communication to people who use our services or parents unless agreed with senior managers
- inform management of any relationship with a parent where this extends beyond the usual parent/professional relationship
- inform management of any requests or arrangements where parents wish to use their services outside of the workplace e.g. babysitting, tutoring

This means that staff should:

- not seek to communicate/make contact or respond to contact with people who use our services outside of the purposes of their work
- not give out their personal details

details how new and emerging technologies may be used. Communication with young people both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Staff should not request or respond to any personal information from young people other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'. Staff should not give their personal contact details to young people for example, e-mail address, home or mobile telephone numbers, details of web based identities. If young people locate these by any other means and attempt to contact or correspond with the staff member, the member of staff should not respond and must report the matter to their manager. The young person should be politely informed that this is not allowed.

Staff should, in any communication with young people, also follow the guidance in section 7 'Standards of Behaviour'. Staff should adhere to Aurora policies, including those about communication with parents and carers and the information they share when using the internet.

Physical contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with young people, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs and any agreed care plan. Not all young people feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, staff should seek the young person's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some people who use our services are more comfortable with touch than others and/or may be more comfortable with touch from some staff than others. Staff should listen, observe and take note of the young person'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 person. It is not possible to be specific about the appropriateness of each physical contact, since an action

- use only equipment and Internet services provided by Aurora
- follow the Acceptable Use policy
- ensure that their use of technologies could not bring Aurora into disrepute

This means that staff should:

- be aware that even well intentioned physical contact may be misconstrued by the young person, an observer or any person to whom this action is described
- never touch a young person in a way which may be considered indecent
- always be prepared to explain actions and accept that all physical contact be open to scrutiny
- never indulge in horseplay or fun fights

that is appropriate with one young person, in one set of circumstances, may be inappropriate in another, or with a different person.

Any physical contact should be in response to the young person's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Staff should therefore, use their professional judgement at all times. Physical contact should never be secretive, or for the gratification of the member of staff, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the manager and recorded.

Where appropriate, the manager should consult with the Local Authority Designated Officer (the LADO) or Adult Safeguarding Team. Extra caution may be required where it is known that a young person has suffered previous abuse or neglect. Staff need to be aware that the young person may associate physical contact with such experiences. They also should recognise that people who use our services may seek out inappropriate physical contact. In such circumstances staff should deter the young person sensitively and help them to understand the importance of personal boundaries. A general culture of 'safe touch' should be adopted, where appropriate, to the individual requirements of each young person. People with physical disabilities may require more contact to assist their everyday living and learning. The arrangements should be understood and agreed by all concerned, justified in terms of the young person's needs, consistently applied, open to scrutiny and clearly detailed in the care plan.

Other activities that require physical contact

For some teaching or clinical activities such as PE, drama, physiotherapy, aquatic therapy or some holistic therapies, staff may need to initiate some physical contact with young people, for example, to demonstrate technique in the use of a piece of equipment, adjust posture, support a young person so they can perform an activity safely or for health or medical reasons. Physical

- always allow/encourage people who use our services, where able, to undertake self-care tasks independently
- ensure the way they offer comfort to a distressed young person is age appropriate
- always tell a colleague when and how they offered comfort to a distressed person, making a note of the incident in the young person's daily notes
- establish the preferences of people who use our services
- consider alternatives, where it is anticipated that a young person might misinterpret or be uncomfortable with physical contact
- always explain to the young person the reason why contact is necessary and what form that contact will take
- report and record situations which may give rise to concern
- be aware of cultural or religious views about touching and be sensitive to issues of gender

This means that settings should:

- ensure they have a system in place for recording incidents and how information about incidents and outcomes can be easily accessed by senior management
- provide staff, on a 'need to know' basis, with relevant information about young people in their care

This means that staff should:

- treat people who use our services with dignity and respect and avoid contact with intimate parts of the body
- always explain to a young person the reason why contact is

contact should take place only when it is necessary in relation to a particular activity. Where possible 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 and undertaken with the permission of the young person. Contact should be relevant to their age / understanding and staff should remain sensitive to any discomfort expressed verbally or non-verbally by the young person. Guidance and protocols around safe and appropriate physical contact may be provided, for example, by sports or professional governing bodies 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 (where appropriate). 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 and people who use our services informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

necessary and what form that contact will take

- when it is a child seek consent of parents where a pupil is unable to give this
- make a 'best interests' decision if a young adult is unable to give consent
- consider alternatives, where it is anticipated that a young person might misinterpret any such contact
- be familiar with and follow recommended guidance and protocols
- conduct activities where they can be seen by others if appropriate to do so
- be aware of gender, cultural and religious issues that may need to be considered prior to initiating physical contact

This means that settings should:

- have in place up to date guidance and protocols on appropriate physical contact, that promote safe practice and include clear expectations of behaviour and conduct
- ensure that staff are made aware of this guidance and that it is continually promoted

Intimate / personal care

Aurora has a clear intimate care policy, which ensures that the health, safety, independence and welfare of young people is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care should be open and transparent and accompanied by recording systems and care plans. People who use our services should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable. When assistance is required, this should normally be undertaken by one member of staff, however, they should try to ensure that another appropriate adult is in

This means that education settings should:

- have written care plans in place for any young person who could be expected to require intimate care
- ensure that people who use our services are actively consulted about their own care plan

This means that staff should:

the vicinity who is aware of the task to be undertaken. Intimate or personal care procedures should not involve more than one member of staff unless the young person's care plan specifies the reason for this. A record should be kept of all intimate and personal care tasks undertaken. Any vulnerability, including those that may arise from a physical or learning difficulty should be considered when formulating the individual young person's care plan. The views of the young person and where appropriate, their parents or carers, should be actively sought in formulating the plan and in the necessary regular reviews of these arrangements. People who use our services are entitled to respect and privacy at all times and especially when in a state of undress, including, for example, when changing, toileting and showering.

- adhere to Aurora's intimate personal care policy
- make other staff aware of the task being undertaken
- always explain to the young person what is happening before a care procedure begins
- consult with colleagues 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 the young person and their parents/carers, if appropriate
- avoid any visually intrusive behaviour
- where there are changing rooms announce their intention of entering
- always consider the supervision needs of the people who use our services and only remain in the room where their needs require this

This means that staff should not:

- change or toilet in the presence or sight of people who use our services
- shower with people who use our services
- assist with intimate or personal care tasks which the young person is able to undertake independently

Behaviour management

Corporal punishment and smacking is against the law in all services. Staff should not use any form of degrading or humiliating treatment to punish a young person. The use of sarcasm, demeaning or insensitive comments towards young people is completely unacceptable. Where people who use our services display difficult or

This means that staff should:

- not use force as a form of punishment
- try to defuse situations before they escalate e.g. by distraction

challenging behaviour, staff should follow the setting's behaviour and discipline policy using strategies appropriate to the circumstance and situation. Where a young person has specific needs in respect of particularly challenging behaviour, a positive handling plan, including assessment of risk, should be drawn up and agreed by all parties. Senior managers should ensure that the settings behaviour management policy includes clear guidance about the use of isolation and seclusion. The legislation on these strategies is complex and staff should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the young person's human rights and/or false imprisonment.

- keep parents informed of any sanctions or behaviour management techniques used where appropriate
- be mindful of and sensitive to factors both inside and outside of the setting which may impact on a young person's behaviour
- follow the behaviour management policy
- behave as a role model
- avoid shouting at young people other than as a warning in an emergency/safety situation
- refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI)
- be aware of the legislation and potential risks associated with the use of isolation and seclusion
- comply with legislation and guidance in relation to human rights and restriction of liberty

The use of control and physical intervention

Corporal punishment is not to be used in any of our settings. It is not considered corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child.

The law and guidance for services states that staff may reasonably intervene to prevent a young person from:

- committing a criminal offence
- injuring themselves or others
- causing damage to property
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

Great care must be exercised in order that staff do not physically intervene in a manner which could be considered unlawful. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where the service or setting judges that a young person's behaviour presents a serious risk to themselves or others, they

This means that settings should:

- ensure that they have a lawful behaviour management policy consistent with local and national guidance
- regularly acquaint staff with policy and guidance
- ensure that staff are provided with appropriate training and support
- have an agreed policy for when and how physical interventions should be recorded and reported

This means that staff should:

- adhere to the setting's physical intervention policy

must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan. In all cases where physical intervention has taken place, a record should be made of the incident and subsequent actions and report these to a manager and the young person's parents, where appropriate. (In a care home, it is a legal requirement to record such incidents.)

Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the young person and parents/carers where appropriate are aware of and have agreed to. Parental consent does not permit settings to use unlawful physical intervention or deprive a young person of their liberty.

- always seek to defuse situations and avoid the use of physical intervention wherever possible
- where physical intervention is necessary, only use minimum force and for the shortest time needed

This means that staff must not:

- use physical intervention as a form of punishment

Sexual conduct

Any sexual behaviour by a member of staff with or towards a person who uses our services is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a young person under 18 years of age and sexual activity with a child is very likely to be a matter for criminal and/or disciplinary procedures. Children are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with young people by adults in a position of trust. Sexual activity involves physical contact including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing people who use our services to engage in or watch sexual activity or the production of pornographic material. There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child or young person, and manipulate the relationship so sexual abuse can take place.

All staff should undertake appropriate training so they are fully aware of those behaviours that may constitute 'grooming' and of their responsibility to always report to a senior manager any concerns about the behaviour of a colleague which could indicate that a young person is being groomed.

This means that staff should:

- not have any form of sexual contact with a person who uses our services
- avoid any form of touch or comment which is, or may be considered to be, indecent
- avoid any form of communication with a young person which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact
- not make sexual remarks to or about a young person
- not discuss sexual matters with or in the presence of people who use our services other than within agreed as part of their recognised job role

One-to-one situations

Staff working in one to one situations with people who use our services, including visiting staff from external organisations can be more vulnerable to allegations or complaints. To safeguard both people who use our services and members of staff, a risk assessment in relation to the specific nature and implications of one to

This means that staff should:

- ensure that wherever possible there is visual access and/or an open door in one to one situations
- avoid use of 'engaged' or equivalent signs wherever

one work should always be undertaken. Each assessment should take into account the individual needs of each young person and should be reviewed regularly. Arranging to meet with young people away from the work premises should not be permitted unless the necessity for this is clear and approval is obtained from a senior member of staff, the young person and their parents/carers' where appropriate.

Home visits

All work with people who use our services and parents should usually be undertaken in the setting or other recognised workplace. There are however occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits. It is essential that regard is given to Aurora's risk assessment policy and related risk assessments that are in place to safeguard both staff and people who use our services, who can be more vulnerable in these situations. A risk assessment should be undertaken prior to any planned home visit taking place. The assessment should include an evaluation of any known factors regarding the young person, parents/carers and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, safeguarding concerns, complaints or grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. Following the assessment, appropriate risk management measures should be put in place, before the visit is undertaken. In the unlikely event that little or no information is available, visits should not be made alone.

possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy

- always report any situation where a young person becomes distressed or angry
- consider the needs and circumstances of the young person involved

This means that staff should:

- agree the purpose for any home visit with their manager
- adhere to agreed risk management strategies
- avoid unannounced visits wherever possible
- ensure there is visual access and/or an open door in one to one situations
- always make detailed records including times of arrival and departure
- ensure any behaviour or situation which gives rise to concern is discussed with their manager

This means that settings should:

- ensure that they have regard for Aurora lone-working policy, which all staff are made aware of. These should include arrangements for risk assessment and management
- ensure that all visits are justified and recorded
- ensure that staff are not exposed to unacceptable risk
- make clear to staff that, other than in an emergency, they should not enter a home if the parent/carer is absent
- ensure that staff have access to a mobile telephone and an emergency contact

Transporting people who use our services

In certain situations, staff or volunteers may be required or offer to transport people who use our services as part of their work. As for any other activity undertaken at work, Aurora has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks. Staff should not offer lifts to people who use our services unless the need for this has been agreed by a manager. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded. Staff should never offer to transport people who use our services outside of their normal working duties, other than in an emergency or where not doing so would mean the young person may be at risk. In these circumstances, the matter should be recorded and reported to both their manager and the young person's parent(s). The Group's transportation policy should set out the arrangements under which staff may use private vehicles to transport people who use our services

This means that staff should:

- plan and agree arrangements with all parties in advance
- respond sensitively and flexibly where any concerns arise
- take into account any specific or additional needs of the young person
- have an appropriate licence/permit for the vehicle
- ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive
- ensure that if they need to be alone with a young person this is for the minimum time
- in the case of children and some adults be aware that the safety and welfare of the young people is their responsibility until this is safely passed over to a parent/carer
- report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures
- ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven
- ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified

Educational and social trips

Staff responsible for organising educational visits should be familiar with local and national guidance for Educational visits. These and other service visits are covered by Aurora's policy and procedures for activities and visits. All trips should have a suitable and sufficient risk assessment, prior to leaving the setting. This would include assessment of any risks to employees, young people or others during a trip, and the measures that

This means that staff should:

- adhere to their organisation's educational visits guidance
- always have another adult present on visits, unless otherwise agreed with senior staff
- undertake risk assessments

should be taken to minimise these risks. For regular activities, such as taking people who use our services to a local swimming pool, shops etc the risks should be considered under the service's general arrangements and a check to make sure that the precautions remain suitable is all that is required. For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new higher-risk activities or trips, a specific assessment of the significant risks should be carried out. Staff should take particular care when supervising people who use our services in the less formal atmosphere where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Where out of service or setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. People who use our services, staff and parents, where appropriate should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/young person ratio and suitable gender mix of staff.

- have parental consent to the activity (where appropriate)
- ensure that their behaviour remains professional at all times
- never share beds with anyone who uses our services
- never share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with Head teacher, parents and people who use our services

First Aid and medication

All settings should have an adequate number of qualified first-aiders. Parents and carers, where appropriate, should be informed when first aid has been administered. Staff should receive sufficient and suitable training and achieve the necessary level of competency before they take on responsibility to support young people with medical conditions. Advice on managing medicines is included in the statutory guidance on supporting people who use our services with medical conditions. In circumstances where a young person needs medication regularly, this would usually be recorded in their individual healthcare plan. This provides details of the level and type of support a young person needs to manage effectively in the service and should include information about the medicine to be administered, the correct dosage and any storage requirements, in line with local policies and procedures.

Young people who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could include for example, the application of any ointment or sun cream, or use of inhalers or EpiPens. If a member of staff is concerned or uncertain about the amount or type of medication being given to a pupil this should be discussed with a suitably qualified member of staff or the Designated Safeguarding Lead.

This means that services should:

- ensure there are trained and named individuals to undertake first aid and administration of medication
- ensure training is regularly monitored and updated
- refer to the services first aid and medication policies

Staff should:

- adhere to the service's health and safety and other related policies and procedures
- make other staff aware of the task being undertaken
- have regard to people who use our services' individual care plans
- always ensure that an appropriate health/risk assessment is

Staff taking medication which may affect their ability to care for young people should seek medical advice regarding their suitability to do so. They should discuss this with their line manager as where a risk is identified, it may be necessary to prevent the person from working directly with young people. Staff who need to bring their own medication to work should inform their line manager and ensure that it is securely locked away at all times.

undertaken prior to undertaking certain activities

- explain to the young person what is happening
- always act and be seen to act in the pupil's best interest
- record medication in line with the procedure of that individual setting
- not work with people who use our services whilst taking medication unless medical advice confirms that they are able to do so

Photography, videos and other images

Many educational and social activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Under no circumstances should staff be expected or allowed to use their personal equipment to take images of people who use our services at or on behalf of the setting. All settings should have arrangements with regard to the taking and use of images, which is linked to their safeguarding policy and Group IT acceptable use policy. This should cover the wide range of devices which can be used for taking/recording images e.g. cameras, mobile-phones, smart phones, tablets, web-cams etc. and arrangements for the use of these by both staff, parents and visitors. Whilst images are regularly used for very positive purposes staff need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. Regard needs to be given when images are taken of young or vulnerable young people who may be unable to question why or how the activities are taking place.

People who use our services who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to anyone who appears uncomfortable and should recognise the potential for misinterpretation. Making and using images of people who use our services will require the age appropriate consent of the individual concerned and their parents/carers, where appropriate. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the setting have access.

This means that staff should:

- adhere to Aurora's IT acceptable use policy
- only publish images of people who use our services where they and their parent/carer, where appropriate have given explicit written consent to do so
- only take images where the person is happy for them to do so
- only retain images when there is a clear and agreed purpose for doing so
- store images in an appropriate secure place in the service or setting
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- be able to justify images of people who use our services in their possession
- avoid making images in one to one situations

This means that staff should not:

For the protection of young people, it is recommended that when using images for publicity purposes that the following guidance should be followed:

- in the case of using an image of a child, avoid naming the child, (or, as a minimum, use first names rather than surnames)
- if the child is named, avoid using their image
- services should establish whether the image will be retained for further use, where and for how long
- images should be securely stored and used only by those authorised to do so.

- take images of people who use our services for their personal use
- display or distribute images of people who use our services unless they are sure that they have consent to do so
- take images of young people using personal equipment
- take images of young people in a state of undress or semi-undress
- take images of young people which could be considered as indecent or sexual

Exposure to inappropriate images

Staff should take extreme care to ensure that people who use our services and particularly children are not exposed, through any medium, to inappropriate or indecent images. There are no circumstances that will justify staff: making, downloading, possessing or distributing indecent images or pseudo-images of young people (child abuse images). Accessing these images, whether using the service or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal. If indecent images of young people are discovered at the establishment or on the service or setting's equipment an immediate referral should be made to the Designated Safeguarding Lead, and the police contacted if relevant. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of young people known to the service, a referral should also be made to young people's social care team and the LADO or Safeguarding Team in line with local arrangements.

Under no circumstances should any member of staff use Aurora equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the member of staff to continue working with children and young people.

Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of young people or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the DSL

This means that staff should:

- abide by Aurora's acceptable use and e-safety policies
- ensure that young people cannot be exposed to indecent or inappropriate images
- ensure that children are not shown films or programmes (including computer games) that are certified for an older age group.

contacted without delay. Staff should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility they will be at risk of prosecution themselves.

Personal living accommodation including on site provision

Generally, staff should not invite any people who use our services into their living accommodation unless the reason to do so has been firmly established and agreed with their manager and the young person's parents/carers. It is not appropriate for staff to be expected or requested to use their private living space for any activity, play or learning. This includes seeing people who use our services for e.g. discussion of reports, academic reviews, tutorials, pastoral care or counselling. Managers should ensure that appropriate accommodation for such activities is found elsewhere in the service.

Under no circumstances should people who use our services be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation. This guidance should also apply to all other persons living in or visiting the private accommodation.

Curriculum, Information, advice and guidance

Many areas of the curriculum or information and advice given to young people can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to clearly identified learning outcomes. This can be supported by developing ground rules with people who use our services to ensure sensitive topics can be discussed in a safe environment. This plan should highlight areas of risk and sensitivity and care should be taken especially in those areas of the curriculum or guidance where usual boundaries or rules are less rigorously applied e.g. drama or whilst delivering personal care. Responding to young people's questions requires careful judgement and staff should take guidance in these circumstances from their line manager or Designated Safeguarding Lead.

Care should be taken to comply with the setting's policy on spiritual, moral, social, cultural (SMSC) approaches. Staff should also comply at all times with the policy for sex and relationships education (SRE). It should be noted that parents have the right to withdraw their children from all or part of any sex education provided but not from the National Curriculum for Science.

This means that staff should:

- be vigilant in maintaining their privacy, including when living in on-site accommodation
- be mindful of the need to avoid placing themselves in vulnerable situations
- refuse any request for their accommodation to be used as an additional resource for the service
- be mindful of the need to maintain appropriate personal and professional boundaries
- not ask people who use our services to undertake jobs or errands for their personal benefit

This means that staff should:

- have clear written lesson/ session or discussion plans for sensitive subjects
- take care when encouraging people who use our services to use self-expression, not to overstep personal and professional boundaries
- be able to justify all curriculum materials and relate these to clearly objectives

This means that staff should not:

- enter into or encourage inappropriate discussions which may offend or harm others
- undermine 'British' or Aurora values
- express any prejudicial views attempt to influence or impose their personal values, attitudes or beliefs on people who use our services

Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Aurora has a clear and accessible whistleblowing policy. Staff who use whistle blowing procedures have their employment rights protected. Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of young people may be at risk.

This means that services should:

- Ensure that all staff understand the Whistleblowing policy

This means that staff should:

- report any behaviour by colleagues that raises concern
- report allegations against staff and volunteers to their manager, or registered provider, or where they have concerns about the manager's response report these directly to the DSL or the whistle blowing help line

Sharing concerns and recording incidents

All staff should be aware of their establishment's safeguarding procedures, including the procedures for dealing with allegations against staff and volunteers. In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately recorded and reported to the Head teacher, senior manager or Designated Safeguarding Lead as appropriate. Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with or behaviour towards people who use our services, so that appropriate support can be provided and/or action can be taken. To safeguard and protect people who use our services and colleagues, where staff have any concerns about someone who works with young people, they should immediately report this to the Headteacher, Head of service or use the Governance phone, in line with the setting's procedures.

This means that staff should:

- be familiar with their settings arrangements for reporting and recording concerns and allegations
- know how to contact the LADO or Safeguarding team and Ofsted/CQC directly if required
- 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 service or setting

This means that settings will:

- have an effective, confidential system for recording and managing concerns raised by any individual regarding adults' conduct and any allegations against staff and volunteers