



# Safeguarding Children and Young People 2024-2025



Registered Charity Number: :1175729

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# 1. Introduction

ASD Helping Hands has a legal and moral responsibility to provide a duty of care for children and implement procedures to safeguard their well-being and protect them from abuse.

All references to child and/or children in this document apply equally to young people. Definitions

The Children Act, 2004 defines a child as being up to the age of 18 years old. Extensions of

this exist for children who have special needs and for those in local authority care settings.

#### 2. **Aims**

With this Child Safeguarding Policy, ASD Helping Hands aims to:

• Raise awareness of the duty of care responsibilities relating to children and young

people throughout the organisation.

• Actively encourage good practice amongst all staff, elected members and volunteers

throughout the Organisation and promote wider awareness wherever possible, i.e. partnership organisations and user groups.

• Create a safe and healthy environment within all our services, avoiding situations

where abuse or allegations of abuse may occur.

• Respect and promote the rights, wishes and feelings of children and young people.

Listen to children and young people, minimising dangers and working closely with other agencies.

• Recruit, train, supervise and support staff, elected members and volunteers who work with children and young people to adopt best practice to safeguard and protect children and young people from abuse or harm, and themselves against false allegations. Staff and volunteers who work with children and young people will be subject to the appropriate level of Disclosure and Barring Service check.

• Respond to any allegations and concerns against staff and volunteers appropriately

and implement the appropriate disciplinary and appeals procedures.

• Requires staff, elected members, volunteers to adopt and abide by the ASD Helping Hands Child Safeguarding Policy and Procedures and Code of Conduct for Charities and Voluntary Organisations.

Objectives

ASD Helping Hands will do this by:

• Providing appropriate training for staff, elected members and volunteers, to enable

them to recognise the potential signs and indicators of abuse or harm and to

improve good practice.

• Aiding staff, elected members and volunteers to respond sensitively and seriously to

a child or young person who discloses information about abuse and be confident and able to take appropriate action swiftly, regardless of who the allegation is about, e.g. carer/staff member.

• Always maintaining a level of good working practice and therefore reducing the risk to children and young people under the care of our staff and volunteers.

• Promoting the general welfare and wellbeing of children and young people during

and within ASD Helping Hands services.

• Developing and implementing effective procedures for recording and responding to

incidents and accidents.

• Developing and implementing effective procedures for recording and responding to

complaints of alleged or suspected child abuse.

# 3. Recruitment

It is important that all staff and volunteers working or having contact with children and young people, whether they are full time, part time, paid or unpaid, have the same recruitment and selection procedures applied to them, and that these procedures are used

to obtain as much information as possible about the person's previous experience of, and

suitability for, working with children.

# 3.1 Stage 1 – Pre-recruitment

It is essential that the need to work with children is clearly identified from the outset of the

recruitment process for any post/voluntary position. When preparing paperwork for the position (job description, personal specification etc) clear reference should be made to this

requirement. If such a post requires the successful candidate to be checked by the Disclosure and Barring Service, it is essential that this is agreed with Personnel Services prior

to any job advertisement being placed. This is in accordance with the ASD Helping Hands

procedure for dealing with DBS checks.

If any form of advertising is used to recruit staff and volunteers, it should reflect:

- The aims of ASD Helping Hands
- The responsibilities and duties of the role
- The level of experience or qualifications required (e.g. experience of working with children is an advantage)
  - ASD Helping Hands Equal Opportunities Policy for Employment

• Any requirements for disclosure checks via the Disclosure and Barring Service

It is noted that often casual employees are selected from persons approaching the Organisation for work, and that volunteers may approach or be approached by the Organisation to become involved in a particular event/initiative, rather than in response to an advertisement. In these cases, when discussing the requirements of the role, the person leading the process must explain the full duties of the position and the checks that will be required (see below). In all cases where a person will be engaged in paid employment by the Organisation, completion of ASD Helping Hands job application form is mandatory.

# 3.2 Stage 2 – Pre-application information

The pre-application information e.g. application pack, sent to potential applicants will contain:

- A job description including roles and responsibilities
- A person specification (e.g. stating qualifications or experience required)
- An application form
- A copy of the Organisations Equal Opportunities Policy for Employment
- A Rehabilitation of Offenders Act Disclosure Form
- An equal opportunities monitoring form
- The Organisations Policy on the Employment of Ex-Offenders
- The Organisations policy on the use and storage of DBS disclosure checks (if relevant)

#### 3.3 Stage 3 – Applicant Information

Information that will be requested from applicants for vacancies will include:

- Name, address and National Insurance Number
- Past career, including duties undertaken within previous posts and reasons for leaving

• Relevant experience, educational qualifications, job specific qualifications and training

• Details of any criminal record or disciplinary history with previous employers, in accordance with the Rehabilitation of Offenders Act 1974 and Rehabilitation of Offenders (Exceptions Order) 1979 (via the Organisations Rehabilitation of Offenders Disclosure form)

- The names of at least two people (not relatives) willing to provide written references who are able to comment on the applicant's previous experience of and suitability for the job applied for. One of the provided referees must be the applicant's current or most recent employer, and one referee must be the most recent employer for whom the applicant worked in a capacity that involved working with children. Therefore at least one of the referees will have knowledge of the applicants previous experience of, and suitability for, working with children and young people
- A medical questionnaire (If applicable)

• Completion of an equal opportunities monitoring questionnaire (completion of which is voluntary at application stage)

NB. By highlighting the need for a Disclosure and Barring Service check (where appropriate) in the paperwork relating to a post the Organisation is fulfilling its obligation to make applicants aware of the need for such a check, should they be successful in their application. Supervisors engaging volunteers should request equivalent information relating to career history, previous offences and referees are supplied.

#### 3.4 Stage 4 – Interview

At least two people must conduct any job interview, and at least one member of the interview panel should have received basic training in child protection issues. During the interview the interview panel should explore information contained in the application form against the qualities and skills needed in the post. Any areas of concern, such as frequent job changes, gaps in candidates' career history or changes in career path, should also be explored during the interview.

Having completed interviews and determined the successful candidates, interview panels must always discuss their choice with Personnel Services prior to making an offer of employment. This enables Personnel Services to check confidential information held on the Rehabilitation of Offenders Disclosure Form, Equal Opportunities Monitoring form and any references received prior to the offer being made.

Offers of employment must always be made subject to the receipt of two written references considered satisfactory by the Organisation (and in the case of posts working with children, which comply with the requirements outlined above). In cases where a Disclosure and Barring Service check is required the post must also be made subject to receipt of a satisfactory disclosure check. Written offers of employment issued by Personnel Services will reflect these conditions.

#### 3.5 Stage 5 – Checks and References

All staff and volunteers recruited to work in services for children and young people must be checked for any possible irregularities, which may give reason for concern.

Disclosure and Barring Service- The Organisation is registered with the Disclosure and Barring Service for the purpose of undertaking 'disclosure' checks for employees and volunteers engaged in the delivery of ASD Helping Hands services/projects. As outlined above, it must be made clear from the outset if a disclosure is required for a post. Queries regarding the eligibility of a post for a disclosure check should be discussed with Personnel Services. For posts where a check is deemed necessary, paperwork issued during the recruitment process will reflect this fact and any offer of employment will be made subject to a satisfactory check. Once an offer of employment has been made on these grounds, Personnel Services or an officer nominated to deal with disclosure checks within the relevant service (NB. All such nominated officers, including relevant Personnel staff, have themselves been subject to a DBS disclosure), will issue a disclosure application form. Once completed, this form must be returned to Personnel Services/the nominated officer within the service together with original personal documentation (such as a passport, driving licence, birth certificate – a list of acceptable documents, as determined by the Disclosure and Barring Service is supplied with the application form). The officer receiving this paperwork is then required to undertake a number of checks, which are also recorded on the disclosure application form. The disclosure application form is then forwarded to the Personnel Services Manager who reviews the information contained on the form and may then authorise the check, despatching the form to the Disclosure and Barring Service. New recruits to posts which require a disclosure to be undertaken should not commence their new job until the disclosure has been received and Personnel have confirmed that it is acceptable.

A minimum of two references must be taken up, and these should meet the conditions outlined above. Where relevant queries arising from the reference must be discussed with Personnel Services and followed up by letter or telephone.

NB. When appointing volunteers Supervisors should request references in accordance with the requirements of this policy. It is the responsibility of Supervisors to take up and check these references – Personnel Services can supply a standard form to assist with this process.

# 3.6 Stage 6 – Induction and Training

It is important that the recruitment and selection process is followed by relevant induction

and training to further protect children and young people from possible abuse. Appropriate training will enable individuals to recognise their responsibilities regarding their own good practice and the reporting of suspected poor practice and concerns or allegations of abuse.

The induction and training will include:

- Basic awareness of the signs and indicators of abuse and an understanding of them responsibility to act swiftly and sensitively when concerns arise.
- All staff and volunteers need to be aware of the procedures they need to follow in response to any concerns that they have.
- Supervisors should ensure that this policy document is read and understood by all new and existing staff and volunteers
- Clarification of the job expectations, roles and responsibilities (e.g. through a formal or informal work programme / objectives).
- Child Safeguarding procedures explained, and training needs established.

#### 4. Roles and Responsibilities of employees/volunteers

Safety of participants and employees/volunteers is always of prime consideration.

• All accidents involving anyone should be recorded in the organisation's accident book immediately or as soon as practicably possible.

- Employees/volunteers are responsible for familiarising themselves with building/facility safety issues, such as, fire procedures, location of emergency exits, location of emergency telephones and first aid equipment.
- Employees/volunteers are responsible for reporting suspected cases of child abuse to the appropriate individuals and/or agencies.
- Employees/volunteers will be expected to keep an attendance register for all organised sessions.
- Appropriate employees/volunteers should have access to any parent consent/emergency consent forms for all children taking part in any activities [this information should be confidential].
- Employees/volunteers should ensure that their activities start and end on time.
- Employees/volunteers are expected to promote, demonstrate and incorporate the values of fair play, trust and ethics throughout their activities.
- Employees/volunteer should ensure that they are adequately insured, to protect against claims of negligence, through their organisation or their own personal insurance if acting as a self-employed agent.

#### 5. Admission Procedures

A register of names, addresses, next of kin and contact addresses and telephone numbers for emergencies will be kept.

Parents/carers, and where appropriate older children, will be given a copy of a written statement which specifies the action which will be taken in the event of a child becoming ill or being injured and which indicates that any information which suggests that a child has been abused will be passed on to the Social Services Department and/or the police.

# 6. Good Practices for Staff, Elected Members and Volunteers

Promoting good practice among staff, elected members and volunteers will limit the possibilities of allegations against themselves, the Organisation and potential risks in which situations of harm or abuse of a child may occur.

The guidelines aim to promote positive practice and are examples of care which should be taken by staff, elected members and volunteers while working with children and young people.

• Always be publicly open when working with children and young people.

• Avoid situations where a member of staff, elected member or volunteer and an individual child or young person are alone unobserved. If a conversation is being held in a room away from others, where possible it should be held in a room with a glass door or window, and more than one adult should be present.

• Children or young people should never be left unattended. For example, it is the parents/carers responsibility to supervise any children in their care whilst they are visiting the Organisation

- Respect the child or young person and provide a safe and positive environment.
- If any form of physical contact is required, it should be provided openly and according to appropriate guidelines, i.e. National Governing Body of Sport Guidelines
- If supervision in changing rooms or similar environments is required, ensure staff work in pairs and never enter opposite sex changing rooms.
- With mixed groups, supervision should be by a male and female member of staff, where possible.
- Staff, elected members and volunteers must respect the rights, dignity and worth of every person and treat everyone equally within the context of the activity.
- Staff, elected members and volunteers must place the wellbeing and safety of the child or young person above the development of performance.

Staff, elected members and volunteers must feel confident to report concerns or worries about other staff members, elected members or volunteers to the appropriate person in authority, i.e. the Child Safeguarding Co-ordinator, or directly report to the relevant Multi- Agency Safeguarding Hub and/or the Police if the Child Safeguarding Coordinator cannot be contacted.

• If a child or young person is accidentally injured as the result of a staff member, elected member or volunteers actions, seems distressed in any way, appears to be sexually aroused by your actions, misunderstands or misinterprets something you have done, always report such incidents as soon as possible to your supervisor and make a written report.

• If a child or young person arrives at the activity or service showing any signs or symptoms that give you cause for concern you must act appropriately and follow the procedures outlined in this document under section 8.

• The Child Safeguarding Co-ordinator must be informed of all potential Child Protection incidents or concerns at the earliest opportunity. Parents/Carers will be contacted through the relevant MASH team and not by any Officer from ASD Helping Hands.

It is not good practice for staff, elected members and volunteers to:

• Spend unreasonable amounts of time alone with children or young people away from others.

- Take children or young people alone on a car journey, however short.
- Take children or young people to your home where they will be alone with you.
- Arrange to meet children or young people outside an organised activity or service.

If these situations are unavoidable, they should only occur with the full prior knowledge and consent of your supervisor and the child or young person's parents/carer. Written consent may be desirable. Staff, elected members and volunteers should never:

- Engage in rough physical games including horseplay.
- Engage in sexually provocative games.
- Allow or engage in inappropriate touching of any form.

• Allow children or young people to use inappropriate language unchallenged, or use it yourself.

• Make sexually suggestive comments about or to a child or young person, even in fun.

• Let any allegation a child or young person makes be ignored or go unrecorded.

• Do things of a personal nature for children and young people that they can do for themselves, e.g. assist with changing.

- Share a room with a child or young person.
- Enter areas designated only for the opposite sex.
- Use the internet to access child pornography sites.

• Should not take a child to the toilet, unless this is an emergency and a second, same sex member of staff is present.

• Use a mobile phone in changing areas, as most modern phones also have a camera built into them.

NB. It may sometimes be necessary to do things of a personal nature for children or young people, particularly if they are very young or are disabled. These tasks should only be carried out with the full understanding and consent of the parents. In an emergency situation that requires this type of help, you should endeavour to have someone present and fully inform the parents as soon as it is reasonably possible. In such situations it is important that you ensure that all staff etc. are sensitive to the child or young person and undertake personal care tasks with the utmost discretion.

Children can be subjected to abuse by those who work with them in any and every setting and it is important that all reasonable steps are taken by ASD Helping Hands to ensure that unsuitable people are prevented from working with children and young people.

#### 7. Types of Abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a

child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely,

by a stranger. They may be abused by an adult or adults, or another child or children.

Remember it is not your role to determine if a child is being abused, only to record and report your concerns to the ASD Helping Hands Child Safeguarding Co-ordinator, MASH team or the Police who have the responsibility to investigate concerns.

The following definitions and symptoms are not a comprehensive or definitive list, but it

provides a guide to the more common non-accidental injuries which may suggest situations where more expert advice should be sought.

#### 7.1 Neglect

The persistent failure to meet a child's basic physical and psychological needs, which is likely to result in damage to the child's health and/or development. Neglect in recreational or social activities might occur if employees/volunteers fail to ensure that children, in their care, are safely protected or are exposed to undue risk of injury, cold, excessive heat, etc.

#### Common signs of Neglect

Constant Hunger	Poor Personal Hygiene	Constant tiredness	Poor state of clothing
Emaciated	Frequent lateness or nonattendance at school	Untreated medical problems	Destructive tendencies
Low self esteem	Neurotic behaviour	No social relationships	Running away
Compulsive stealing or scavenging			

#### 7.2 Sexual Abuse

Actual or likely sexual exploitation of a child is the involvement of children in sexual activities they do not truly comprehend, to which they are unable to give informed consent, that violate social taboos of family roles and as such are illegal. Recreational and social situations may involve physical contact (e.g. supporting and guiding children) and could potentially create situations where sexual abuse may go unnoticed. Abusive situations occur if adults misuse their power over children in order to meet their own sexual needs.

#### Common signs of sexual abuse

			Running away from
Lack of trust in	Over familiarity	Withdrawal and	home/sudden
adults and/or fear	with adults or	introversion/problems	behaviour changes
of a particular	provocative	with peer	e.g. falling
individual[s]	behaviour	relationships	standards,
			truancy, etc.
			Displaying sexual
Low self esteem	Stealing	Substance misuse	knowledge beyond
			age group

Involvement in prostitution	Over-sexed behaviour	Sleeplessness, nightmares, fear of the dark	Bruises, scratches, bite marks
Depression, suicide attempts	Change in Eating habits	Pregnancy, particularly when reluctant to name the father	Recurring urinary tract problems/vaginal infections

# 7.3 Physical Abuse

Actual or likely physical injury to a child or failure to prevent physical injury or suffering to a child e.g. hitting, burning, shaking, etc. In recreational activities this might occur where the nature and intensity of activities exceeds the capacity or ability of the child or where drugs are used to enhance performance.

Common signs of physical abuse

Unexplained injuries or burns	Improbable excuses given to explain injuries	Refusal to discuss injuries	Untreated injuries
Admission of punishment which appears excessive	Bald patches	Withdrawal from physical contact	Arms and legs covered in hot weather
Fear of returning home	Fear of medical help	Self-destructive tendencies	Aggression towards others
Running away	· · · · ·		

# 7.4 Emotional Abuse

The persistent emotional ill treatment or rejection of a child resulting in severe adverse effects on the emotional, physical and/or behavioural development of a child. It can involve coldness or hostility towards a child, conveying to children that they are worthless or inadequate, causing a child to feel frightened or in danger, etc. Emotional abuse in recreational or social activities might also include situations where parents, employees/volunteers' subject children to constant criticism, sarcasm, bullying or unrealistic pressure to perform to high expectations.

Common signs of emotional abuse

and/or emotional punish	nission of ment which s excessive	Continual self- deprecation
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Sudden speech disorders	Fear of new situations	Inappropriate emotional responses to painful situations	Neurotic behaviour e.g. thumb sucking, hair twisting, etc.
Self-mutilation	Fear of parents being contacted	Extremes of passivity or aggression	Substance misuse
Running away	Compulsive stealing, scavenging		

# 8. Responding to Concerns and Allegations

#### 8.1 What to do if you suspect possible harm or abuse

The following procedures are intended to inform all staff, elected members and volunteers of what actions they should take if they have concerns or encounter a case of alleged or suspected child abuse.

#### 8.2 Duty to Refer

There is a duty on staff to report concerns about children where they may be at risk of harm or abuse. It is appropriate to gather and record facts about the concern, but care must be taken not to prejudice formal investigations which must be conducted in accordance with laid down procedures. There are a range of situations that staff, elected members and volunteers may need to respond to where there is a concern or case of alleged or suspected harm. For example:

- responding to a child or young person or officer etc disclosing abuse, i.e. they make an allegation of harm
- responding to allegations or concerns about a member of staff, elected member or volunteer

• responding to allegations or concerns about any other person, i.e. parent, carer, other service user and the impact their actions may have on a child.

#### 8.3 Responding to a child or young person making allegations of abuse

Abused children and young people will only tell people they trust and with whom they feel safe. By listening and taking seriously what the child or young person is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

- Stay calm and listen carefully to what is said.
- Find an appropriate opportunity to explain that it is likely that the information will need to be shared with others do not promise to keep secrets.
  - Allow the child or young person to continue at their own pace.

• Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.

- Reassure the child or young person that they have done the right thing in telling you.
- Tell them what you will do next and with whom the information will be shared.
- Record in writing on a Child Safeguarding Incident Reporting Form all the details that

you are aware of and what was said using the child or young person's own words, as soon as possible.

• Report and inform the Child Safeguarding Co-ordinator (if relevant) and/or directly

contact the relevant MASH team or the Police as appropriate.

• The Child Safeguarding Co-ordinator informs relevant persons, i.e. the relevant MASH team or the Police if appropriate.

# 8.4 Responding to allegations or concerns against a member of staff, elected member or volunteer

- Take the allegation or concern seriously.
- Consider any allegation or concern to be potentially dangerous to the child or young person.
- Record in writing on a Child Safeguarding Incident Reporting Form all the details that you are aware of as soon as possible.

• Report to and inform the Child Safeguarding Co-ordinator or directly contact the relevant MASH team or the Police as appropriate.

• Child Safeguarding Co-ordinator informs relevant persons, i.e. the relevant MASH team or the Police.

# 8.5 Responding to allegations ort concerns against another person i.e. parent / carer/ service user

- Take the allegation or concern seriously.
- Consider any allegation or concern to be potentially dangerous to the child or young person.
- Record in writing on a Child Safeguarding Incident Reporting Form all the details that you are aware of as soon as possible.
- Report to and inform the Child Safeguarding Co-ordinator
- Child Protection Co-ordinator informs relevant persons, i.e. the relevant MASH team or the Police if appropriate.

#### 9. Child Safeguarding Co-Ordinator / Designated safeguarding officer

The nominated Child Safeguarding Co-ordinator is responsible for:

• Ensuring the Child Safeguarding Policy is adhered to.

• Ensuring that the relevant staff member records their concerns/completes the disclosure form as soon as possible.

• Recording their own conversations with the person, staff member or child to whom the disclosures were made.

• Contacting the MASH team, preferably in the area the child lives – passing on full details including information that they have on the child/young person.

• Providing a contact telephone number for the MASH team to get back to ASD Helping Hands.

- Ensuring the MASH team confirm who will liaise with the parent/carer.
- Increasing awareness of child safeguarding issues within the Organisation.
- Maintaining clear communication channels between Co-ordinators.
- Ensuring that if a disclosure has been made to another member of staff that the child is not re-questioned by any other member of ASD Helping Hands.

The nominated child safeguarding co-ordinator/Designated safeguarding officer for ASD Helping Hands is:

Lee Gibbons Operations Manger

Tel: 07884141299 / 01362 685860 Email: lee.gibbons@asdhelpinghands.org.uk Address: Room 412-416, Breckland Business Centre, Dereham, Norfolk, NR19 1FD

#### 10. Further Contact Details

#### Norfolk

Norfolk Multi-Agency Safeguarding Hub Tel: 0344 8008020 Email: <u>mash@norfolk.gcsx.gov.uk</u>

#### Police

Tel: 01603 276151 Email: mashsupervisor@norfolkpnn.police.uk

#### Suffolk

Suffolk Multi-Agency Safeguarding Hub Tel: 0808 800 4005

# 11. Confidentiality and sharing of information

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only, i.e. the Child Safeguarding Co-ordinator, the MASH Team, the Police.

It is extremely important that allegations or concerns are not discussed, as any breach of confidentiality could be damaging to the child or young person, their family, the person whom the allegation is being made against and any child protection investigations that may follow.

Informing the parents of a child or young person you may have concerns about needs to be dealt with in a sensitive way and you should seek advice from the Child Safeguarding Co-ordinator or the MASH Team.

Any individual under suspicion has the right to be notified about the cause for concern. This should be done in joint consultation with the MASH Team and the Police. It is important that the timing of this does not prejudice the investigation.

Recorded information should be stored in a secure place with access limited to Child Safeguarding Co-ordinators, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure). If enquiries arise from the public (including parents) or any branch of the media, it is vital that all staff, elected members and volunteers are briefed so that they do not make any comments regarding the situation. All media enquiries should be directed through the usual channels e.g. the Administration Manager and team.

#### 12. Photography and Pornography

There is increasing evidence that some people have used children and young person's activities and events as an opportunity to take inappropriate photographs or video footage of children and young people. Staff elected members and volunteers should be vigilant at all times and any person using cameras or videos (including those on mobile phones or PDA's) within ASD Helping Hands and at events or activities which involve children and young people should be approached and asked to complete a consent form for the use of cameras and other image recorders.

When commissioning professional photographers or inviting the press to cover Council services, events and activities you must ensure that you make your expectations clear in relation to child protection.

- Check credentials of any photographers and organisations used.
- Ensure identification is always worn, if they do not have their own provide it.

• Do not allow unsupervised access to children or young people or one to one photographic sessions.

• Do not allow photographic sessions outside of the activities or services, or at a child or young person's home.

- Parents must be informed that photographs of their child or young person may be taken during Organisation activities or events, and parental consent forms need to be signed agreeing to this. This must include information about how and where these photographs will be used.
- It is recommended that the names of children or young people should not be used in photographs or video footage, unless with the express permission of the child or young person's parent.

#### 13. Whistle Blowing Policy

Organisation employees are often the first to realise that there may be something seriously wrong within the Organisation. Any serious concerns that you have about any aspect or service provisions or the conduct of officers or Members of ASD Helping Hands or others acting on behalf of the Organisation, can be reported under the ASD Helping Hands Whistleblowing Policy.