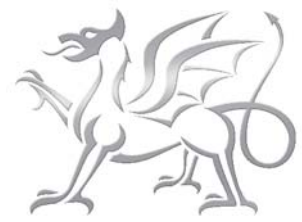


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CHILDREN AND YOUNG PEOPLE - RIGHTS TO ACTION



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

SAFE FROM HARM: SAFEGUARDING CHILDREN IN VOLUNTARY AND COMMUNITY ORGANISATIONS IN WALES

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A Code of Practice for Safeguarding the Welfare of Children in Voluntary and Community Organisations in Wales

Published by the Welsh Assembly Government 2007

This guidance is intended for small voluntary and community groups that are not currently subject to inspection and/or regulation. This might include arts, hobbies and drama groups, although many other groups may also find it useful.

Those groups that are currently subject to inspection and or regulation must have regard to any requirements that are set by the inspecting/regulatory authority and/or are set down in regulations.

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INTRODUCTION

Thousands of children and young people in Wales are served by voluntary and community organisations every day. Some are enabled to gain skills or knowledge; some gain social confidence or learn a leisure pursuit; others are provided with accommodation or are given counselling and advice. It is to be hoped that all the children and young people who come into contact with these organisations also receive care and attention, and that the organisations protect them from coming to any harm whilst they are working with them.

Although for the overwhelming majority of children this is the case, unfortunately it is not so for all. Very occasionally children or young people are hurt through accidents which might have been prevented by even more thorough vigilance by the organisation in whose temporary care they were. Good organisations spend much time and effort in regularly updating their guidelines in order to prevent accidents such as these.

Even more rarely a child is harmed or abused by another child, by a stranger, or by a member of staff or volunteer whilst in the charge of a voluntary or community organisation. Harm and abuse is always traumatic for the child and, although most incidents occur in the home, voluntary and community organisations must accept that prevention of harm and abuse is part of their duty to care for the children with whom they work, and should amend their practice accordingly.

This code of practice sets out principles and guidelines which will help voluntary and community organisations to safeguard the welfare of the children and young people under 18 years of age with whom they work.

In particular, the code seeks to enable voluntary and community organisations to use good management policies and practice as a means of preventing the physical, sexual and emotional abuse of children whilst they are in the care of the organisation.

The code supports and reinforces existing legislation and sets out some key principles which are designed to help organisations to consider how best to fulfil their duty to care for the children and young people with whom they come into contact.

There are many types of voluntary and community organisations that work with children and young people under 18 years old, and this code of practice aims to be relevant to them all. For the larger, professionally managed childcare or youth organisations, the code should reflect practices that they have already introduced to meet the requirements of legislation and/or registration. For these organisations the code may prove a useful checklist against which to compare their current practice.

For some smaller organisations the code will provide a framework for action, helping them to introduce practices or to improve existing practices which are appropriate to them in a systematic way.

It is not possible for the code to state precisely what such a wide range of organisations should do to protect children in every situation and the code does not lay down a series of procedures which must be followed by every organisation. Nor is it the intention that the code should encourage organisations to over protect children and thus deny them the chance to learn and grow through taking calculated risks. Instead the code offers a set of principles each accompanied by brief guidelines.

Organisations should use the knowledge and expertise of their staff and/or volunteers to decide how best the issues raised by the principles should be addressed, and the appropriate action to be taken, in the light of their circumstances and structures, and the nature of their activities. Some principles may be difficult to apply directly or may require adaptation in the light of local circumstances.

BACKGROUND

Following the murders of Holly Wells and Jessica Chapman in Soham in 2002 the Government commissioned an inquiry chaired by Sir Michael Bichard to investigate the improvements needed in the safeguarding systems. The Government welcomed his report in 2004 and accepted all of its 31 recommendations. The Safeguarding Vulnerable Groups Act, which gained Royal Assent in November 2006, was introduced specifically in response to recommendation 19, which proposed requiring the registration of those who wish to work with children or vulnerable adults. The Act provides the framework for a new vetting and barring scheme for these groups. The provisions of the Act will apply to all persons working regularly or frequently with children or vulnerable adults, including those working within voluntary and community organisations.

Nothing can be more important than ensuring that children are properly safeguarded. Since 1997 the UK Government has sought to strengthen safeguards for children, and has tried to ensure that lessons are learned from tragic events such as the Soham murders and the death of Victoria Climbié.

The Protection of Children Act scheme was introduced in 2000 and introduced the Protection of Children Act (PoCA) List in which the Secretary of State has a duty to record the names of individuals who are considered unsuitable to work with children. All regulated child care organisations (as defined in the Act) have a statutory duty to refer the names of those individuals who fulfil certain criteria making them unsuitable to work with children for possible inclusion in the PoCA List.

The definition used in the Act is designed to ensure that even the most casual connections and voluntary work are covered by the provisions of the Act. The Act also permits organisations, such as voluntary organisations, sports clubs and scout associations to refer names for possible inclusion in the PoCA List. The effect of inclusion in the PoCA List is that child-care organisations, that are obliged to check names of prospective employees against the list (through the Criminal Records Bureau) before offering employment, will be told whether or not an individual is listed in the PoCA List.

Organisations proposing to offer individuals employment in child care positions must not employ individuals whose names are included on the PoCA List or List 99 (on the grounds that they are unsuitable to work with children). Further they must cease to employ such individuals in child-care positions if they subsequently discover that they are included on these Lists.

Under the Criminal Justice and Court Services Act 2000 it is an offence to knowingly offer work to or to employ in a so-called "regulated" position an individual who is disqualified from working with children. This is either by virtue of being included on one of the Secretary of State's Lists (the PoCA List or its equivalent in Scotland, or List 99) or being subject to a disqualification order made by a court. Individuals who apply to work, offer to work, accept

work or continue to work with children in such positions will be committing a criminal offence and can face prosecution if they are so disqualified.

The Criminal Records Bureau was created in 2002, with the task of providing criminal records checks on people wishing to work with children. The Sexual Offences Act 2003 strengthened notification requirements for sex offenders. The Children Act 2004 further strengthened arrangements to safeguard and promote children's welfare, and introduced local safeguarding children boards.

The Safeguarding Vulnerable Groups Act 2006 provides the legal basis for a new Vetting and Barring Scheme (VBS). The new scheme, expected to be brought in from late 2008, strengthens current arrangements. Its aim is to help avoid harm, or risk of harm, to children and vulnerable adults by preventing those who are unsuitable to work with them from gaining access to them through work.

Those who are working or applying to work with children or vulnerable adults will apply to the scheme through the Criminal Records Bureau (CRB). The applicant will be checked by the CRB through the police national computer and relevant professional and regulatory bodies for any information that might be relevant to their suitability to work with children.

Any relevant information will be considered and if they are considered to present a risk of harm to children or vulnerable adults, they may be barred from working with children, with vulnerable adults or with both of these groups. This may be an automatic bar for those convicted of or cautioned for prescribed offences of an extremely dangerous nature. For lesser offences, although the bar may still be automatic, an applicant will have the right to make representations to the Independent Safeguarding Authority (ISA).

If a person becomes a member of the scheme it means they are not on the barred list and have not been judged to pose a risk of harm to children and the ISA will review its decision if new relevant information came to light. Potential employers will be able to do an online check on an individual's status. But employers should also seek references and interview applicants as appropriate to ensure the protection and safeguarding of all those children and vulnerable adults they are responsible for.

THE CODE

In order to safeguard the welfare of the children and young people in their charge, voluntary and community organisations should consider the issues raised by each of the following statements. They should take action that they deem to be appropriate in the light of their circumstances, structures and the nature of their activities.

1. All staff (whether paid, unpaid, full time or part time) volunteers and applicants for any position involving contact with children, should be subject to the principles of best recruitment and retention practice.

Recruitment

- Confirmation of identity
 - CRB checks
 - Employment history and gaps
 - Qualifications
 - Appropriate training for all Interviewers
 - Appropriate questions at interview
2. Gain at least two written references from persons who have experience of the applicant's work or volunteering with children. Preferably references from the last employer and from any previous employer where the individual worked with children.
 3. Explore all applicants' experience of working or contact with children in an interview before appointment.
 4. Make all appointments conditional on the successful completion of a probationary period.
 - Post-recruitment checks
 - Repeat CRB checks

Policies and Procedures

5. Adopt a policy statement on safeguarding and promoting the welfare of children.
6. Train all staff and volunteers, their line managers or supervisors, and policy makers in child protection.
7. Apply agreed procedures for protecting children to all staff and volunteers.
8. Give all staff and volunteers clear roles and job descriptions.
9. Plan the work of the organisation so as to minimise situations where the abuse of children may occur.

10. Use supervision as a means of protecting children
11. Issue guidelines on how to deal with the disclosure or discovery of abuse.
12. Introduce a system whereby children may talk with a suitable independent person.

GUIDELINES

GUIDELINE 1: All staff (whether paid, unpaid, full time or part time) volunteers and applicants for any position involving contact with children, should be subject to the principles of best recruitment and retention practice.

Most people have never knowingly met or seen a child abuser. This may lead us to imagine that anyone capable of such appalling acts must appear and behave very differently from the rest of society. We may persuade ourselves that no one we know could ever abuse a child. Yet it is likely that most of us will know or meet at least one abuser during our lives, probably without being aware of it.

Voluntary and community organisations cannot rely on the fact that a person is known to an existing member of staff or volunteer as evidence that they are not a potential abuser. Even a person transferring jobs within an organisation from one not involving contact with children to one that does involve contact should be treated in the same way as a total stranger.

Voluntary and community organisations should treat all people wishing to take up paid or voluntary work involving contact with children as applicants for a post. Every applicant should be subject to checks on their identity and any person working, or applying to work with children should be subject to an Enhanced Disclosure via the Criminal Records Bureau.

The applicant's full employment history should be examined and this will include those periods not accounted for in their application forms or curricula vitae. All claims within their application regarding qualifications and membership of professional bodies should be verified.

The person interviewing any job applicant should have the relevant training and be aware of the appropriate questions that need to be asked of all applicants during the interview process.

The fact that an applicant has no previous experience of working with children may not be relevant with many new volunteers wanting to work with children for the first time. However, organisations should still seek information about any setting where the applicant has had regular contact outside their own home with children, including informal volunteering, such as babysitting.

GUIDELINE 2: Gain at least two written references from persons who have experience of the applicant's work or volunteering with children. Preferably references from the last employer and from any previous employer where the individual worked with children.

Before the appointment of any applicant for a paid or voluntary position is confirmed, organisations should write to at least two persons who have first-hand experience of his/her work or voluntary contact with children to seek references. Where an applicant has no experience of paid or voluntary work

with children, a reference may be sought from a reputable person who can comment on the applicant's character and relationships with others.

When writing to a referee, the organisation should state explicitly that the applicant is being considered for a position which involves paid or voluntary work with children and/or young people, and seek views on their suitability for such work. Organisations might also send any job description or written outline of the work to inform the referee's judgement.

The references provided may sometimes be vague or ambiguous. This may be due to haste or the use of colloquial English, but it could also be the referee trying to give a coded message. If anything in a reference causes the organisation to have any doubts about the applicant's suitability to work with children, the referee should be contacted in person or by telephone to discuss the matter further.

Organisations ought to be clear, however, as to what might constitute an acceptable reference for any post. A referee might imply that an applicant is a gay man or lesbian woman, or have information about some minor financial misdemeanour. These matters are not relevant to the prevention of abuse. Organisations must use any information gathered in this way carefully and avoid unfair or unlawful discrimination. Organisations should refer to their equal opportunities policy for guidance if they have one, or consider developing one if not.

GUIDELINE 3: Explore all applicants' experience of working or contact with children in an interview before appointment.

It is common practice for voluntary organisations to interview applicants for paid posts before appointment, usually to ascertain their skills and experience as an aid to selection. Organisations can also use these interviews to explore the applicant's experience of working or contact with children as a means of preventing abuse. Organisations should arrange to interview all prospective volunteers to explore similar issues.

One of more interviewers should ask applicants about their working, voluntary and personal relationships with children, using the information given in the written application. Applicants may also be asked about their ability and commitment to fulfil the duty to prevent the abuse of children set out in the job description or outline of tasks (see Guideline 8).

Should anything in an applicant's responses leave the interviewer(s) in any doubt as to his/her suitability to work with children, then these areas of uncertainty should be explored further through searching follow-up questions.

Again, organisations will need to use information gained in this way only to prevent the abuse of children, applying the principles of equality of opportunity and adhering to their own policy.

At least one, or in some cases the only, interviewer should have sound experience of work with children in the organisation, and preferably should have received training in interviewing applicants for work with children.

Where an organisation remains uncertain about an applicant's ability or commitment to prevent abuse, this should be a prime factor to be considered before an appointment is made. In the case of a volunteer, it may be possible for the organisation to appoint such an applicant to a position that involves no opportunities for contact with children.

Finally, at some point before or immediately following the interview, the organisation should seek to see some form of identification that gives the applicant's full name, date of birth and current address together with his/her signature or photograph; for example a driving licence or passport. This should be compared against the written application form to ensure that the applicant is not assuming a false identity.

GUIDELINE 4: Make all appointments conditional on the successful completion of a probationary period.

Having been reassured by appropriate procedures such as a written application, reference(s), interview and CRB, that an applicant has the ability and commitment to prevent the abuse of children, organisations should not relax their vigilance. Organisations should consider making the appointment of both paid staff and volunteers conditional upon the successful completion of a probationary period.

The length of a probationary period will vary dependent on the type of position and whether it is full-time or for a few hours per week, but will normally be between three months and one year. A firm date for the review of a probationary period should be set on appointment.

The probationary period may coincide with the time during which a new paid or voluntary staff member is given induction and training in the skills and knowledge needed to perform the work. But its main purpose in respect of this code of practice is to enable an organisation to monitor the work of the staff member in order to be assured that s/he is not a potential abuser of children.

On appointment, the new paid or voluntary staff member should be given details of a probationary period and its purpose, the date for its review, together with any details of induction and/or training.

Some positions, for example voluntary helpers on holiday play schemes or paid staff on temporary contracts, may involve appointments that are shorter than a reasonable probationary period. In these situations, paid or volunteer staff should be supervised as if they were undertaking a probationary period.

During the probationary period, it is advisable for the line manager or supervisor to hold supervision meetings on a more frequent basis than normal

(see Guideline 10), and to take special steps to observe the work of the new staff member regularly, both by prior arrangement and otherwise.

On the set date the supervisor should meet with the new staff member to review his/her performance. The supervisor should use notes from supervision meetings and observations made during the probationary period to inform the discussion.

There should be no assumption that a paid or volunteer staff member has automatically completed the probationary period successfully by merely surviving the post until the review date. The supervisor must have no doubt as to the staff member's ability and commitment to prevent the abuse of children, as set out in the job description or outline of tasks, before confirming the successful completion of the probationary period.

The organisation should also repeat CRB checks to ensure that in the interval between the initial check and the appointment of the individual nothing of significance has been recorded against the individual.

GUIDELINE 5: Adopt a policy statement on safeguarding and promoting the welfare of children.

Safeguarding the welfare of children ought not to be seen by voluntary and community organisations as an optional activity which can be added to the programme. Protection from abuse should become an integral part of the policy and practice of all organisations working with children.

Most voluntary organisations recognise that good management requires that everyone is clear about what they are trying to achieve, and that they agree aims and policy statements for that purpose.

Every voluntary and community organisation should adopt a written statement setting out its policy on safeguarding the welfare of the children with whom it works. This policy should state clearly the duty of all those employed by or involved in the organisation to prevent the physical, sexual or emotional abuse of all children with whom they come into contact.

Any such policy statement should be brought to the attention of all existing and new staff, who should also be informed of any guidelines or training that will enable them to implement the policy statement. There may be some advantage in this being part of a broader policy statement on safeguarding the safety and welfare of children in the organisation.

GUIDELINE 6: Train all staff and volunteers, their line managers or supervisors, and policy makers in child protection.

Effective protection of children requires action by the staff of voluntary and community organisations, together with their line managers or supervisors and policy makers. It requires particular skills and knowledge. Some they may

have already, and some they may see as nothing more than good common sense. But other skills and knowledge may have to be acquired.

Large organisations should have an ongoing training programme that may be readily adapted to provide training in the prevention of child abuse alongside, or as a part of, other elements. Smaller organisations may be able to look to umbrella and networking bodies, or to those funding departments of local authorities who already provide training, to amend their programmes to include training in the prevention of abuse, and what immediate action to take when abuse occurs.

Organisations may wish to consider how to meet the training needs of their personnel in the following:

- planning the work of the organisation to prevent abuse;
- becoming an "independent person" to whom children may make representations;
- using supervision as a means of protecting children;
- interviewing applicants for positions involving work with children;
- dealing with abuse which has been disclosed or discovered.

The need for training should not be ignored. Giving staff instructions and guidelines without equipping them with the skills and knowledge for implementation is not an effective means of child protection.

GUIDELINE 7: Apply agreed procedures for protecting children to all staff and volunteers.

There is no certain way of identifying a would-be-abuser. There is always the risk that, with the right circumstances and temptations, an adult in a voluntary or community organisation in contact with children might abuse for the first time. Fortunately, the proportion who do offend is small. But organisations must not let that fact lull them into a false sense of security.

Organisations should, of course, take all reasonable and available steps to exclude known abusers, and guidelines can be found in this document. But since it is not safe to assume that anyone can automatically be excluded from being a potential abuser, any procedures set in place within organisations for the protection of children should apply to all staff. This is not the same as treating each person working with children as being under suspicion, which might severely affect recruitment. Instead it involves taking sensible steps to protect children from abuse, which are then observed by all.

Guideline 9 sets out the need to plan the work of the organisation as a whole so as to reduce opportunities for abuse. Similarly, organisations should plan the work of each staff member, whether paid or voluntary, so as to minimise situations where they might be tempted or able to abuse.

GUIDELINE 8: Give all staff and volunteers clear roles and job descriptions.

The abuse of children is easily concealed, and therefore perpetuated, where there is confusion amongst adults over roles, responsibilities and accountability. Although most staff now receive a job description from their employers, few volunteers receive a written outline of what is expected from them. And job descriptions do not always spell out clearly enough responsibilities for the protection of children.

Each member of staff or volunteer who comes into contact with children through a voluntary or community organisation should have a clear idea of their role. One way is to provide each one with a written description of the work they are expected to do. This might include, amongst other things:

- the person to whom they will be accountable for their work, their line manager or supervisor;
- the person(s) whose work they will supervise (if any);
- a description of the work they will undertake with children, with reference to any relevant guidelines produced by the organisation for safeguarding the welfare of those children;
- the duty to prevent the abuse of all children in contact with the organisation, and reference to the action to be taken if abuse is discovered or disclosed (Guideline 11).

Where organisations choose to work non-hierarchically, such as in workers' co-operatives or in groups of informal voluntary carers, the need for clear roles and accountability is not reduced. It is still possible to introduce ways of describing, monitoring and supervising tasks and responsibilities in such settings.

The job descriptions of staff must observe employment law, but the outline of a volunteer's work need not be complicated. A short list of tasks and responsibilities in addition to the above information will be enough. The volunteer, the person to whom they are accountable and the organisation should each retain a copy. Job descriptions and outlines of work should be reviewed on a regular basis and whenever the tasks change significantly.

Organisations can use the process of writing and revising job descriptions as an opportunity to implement their policy statement on safeguarding the welfare of children. (Guidelines 5 and 9).

GUIDELINE 9: Plan the work of the organisation so as to minimise situations where the abuse of children may occur.

The number of people who are actively seeking to harm or abuse children is probably quite small, and organisations can use the principles in this code to reduce their opportunities for access to children. But there are also people with no record as abusers who offend against children when tempted by finding themselves alone with a child in an isolated setting.

To combat this, voluntary and community organisations should plan their work so as to reduce to the minimum those situations where it may be possible for children to be abused.

Organisations may be able to reduce opportunities for abuse by the way they use premises. For example, asking children to reach an organisation's premises by walking along a dark, unsupervised path is offering an unnecessary opportunity to potential abusers. Or it may be possible to arrange that activities which involve a single child working with an adult take place in a room which can be observed easily by others in nearby areas, even if this is achieved simply by leaving doors open.

Organisations can also reduce opportunities for abuse by reducing to the minimum occasions where a single adult is in the company of a lone child and where there is little or no possibility of the activity being supervised or observed by others.

One way of achieving this would be for organisations to issue guidelines recommending staff or volunteers, whenever possible, not to meet with children away from the organisation's base or meeting place without a parent or other adult being present.

Our society now considers it desirable that a male doctor should have a nurse present when examining a female patient. It reassures the patient and protects the doctor from both wrongful accusation and temptation. We should view the need for safeguards in adult/child relationships in a similar way.

It may not be possible for certain organisations to operate effectively without adults working with individual children or young people in unsupervised settings. For example, schemes for befriending disadvantaged young people under 16 years old may have one-to-one contact as their main method of work.

If organisations operate in these ways, they must recognise the risk they take should they inadvertently place a potential abuser in a post involving contact with children. Organisations should take every step possible to assure themselves that people in such high risk positions have no record of, nor potential to abuse. This may involve an even more thorough interview, the taking of extra references (see Guideline 2) and very close supervision. Organisations should check the criminal records of prospective paid staff or volunteers before appointment to such high risk posts through the CRB.

GUIDELINE 10: Use supervision as a means of protecting children

Although the opportunities for abuse can be reduced to the minimum by the management of the organisation and the buildings it uses, it is through the good management of staff and volunteers that voluntary and community organisations can be most effective in protecting children.

The guidelines stated the need for clear lines of accountability as a means of child protection. Organisations should ensure that those directly responsible for staff in contact with children, the line managers or supervisors, use good management supervision to prevent and/or detect abuse.

It is recommended that supervisors meet each staff member for whom they are responsible on a regular basis to review and plan their work. On each occasion the supervisor might ask questions about the staff member's working and personal relationships with the children with whom they come into contact.

There is still discussion as to what are the detectable signs of an abusing relationship. However, if any child appears to be receiving exceptional treatment, either being highly favoured or being treated unduly harshly, the supervisor should explore the relationship further with the staff member. If, the supervisor is not convinced by talking with the staff member, that the child's welfare is secure, s/he should talk confidentially with other staff or volunteers and with the child concerned. The supervisor should not drop the issue until s/he is reassured that there is no possibility of abuse.

Supervisors should also take or create opportunities for observing the member of staff whilst s/he is working with children. Ideally, supervisors should keep a brief written record of each supervision meeting and observed session.

Good supervision is a useful way for an organisation to ensure that all its paid staff and volunteers are working effectively and for staff members to gain the most from their paid or voluntary work. The prevention of abuse should be seen as one part of that process.

GUIDELINE 11: Issue guidelines on how to deal with the disclosure or discovery of abuse.

Organisations are advised to prepare and issue to all staff brief written guidelines setting out the steps they must take if a child discloses details of abuse to them, or if they discover evidence that abuse has taken place.

The guidelines should contain:

- a reminder of the staff member's duty to prevent abuse, including the duty to report any abuse discovered or suspected;
- guidance on what constitutes abuse and how to recognise it;
- specific instructions as to who to inform if abuse is disclosed or discovered;
- the name and contact address/number of the independent person, should it be suspected that the abuser is a superior in the organisation (see Guideline 12) or the agencies which have the statutory responsibility to investigate, namely the Social Services or the Police;
- some indication as to what might happen when they report the abuse;
- guidance on how to support the abused child.

Local voluntary organisation should seek guidance from their Social Services Department's Child Protection Team in drawing up these guidelines, if they are in any doubt as to the detail.

GUIDELINE 12: Introduce a system whereby children may talk with an independent person.

Workers in voluntary and community organisations may gain the trust of children and young people to such an extent that it is to them that a child turns when wanting to share unhappiness about being abused, whether within the organisation, at home or elsewhere. Many workers may not know how to deal with this disclosure.

Sadly, it is a common feature of situations where children have been abused that an adult has exploited the power that they have over a child to gain submission or silence. Some of this power derives from the superior physical strength of the adult, but it also stems from the power relationship inherent in the situation.

In most voluntary and community organisations working with children, the adults make the majority of the important decisions and thereby have most of the power. If potential abusers are attracted to voluntary child care and youth organisations, it is probably the potential for exploiting this unequal power relationship that draws them.

In recent years a number of organisations have sought to give more rights and power to the children with whom they work. Youth organisations have collectively adopted empowerment as one of their central aims, and child care organisations have tried to increase the rights and choices of service users. Giving power to children also has the important side effect of reducing the potential for undiscovered abuse. The Children's Commissioner has an important role in empowering children.

Voluntary organisations may wish to build on existing and new programmes for increasing the rights of children by introducing systems for children to make representations to independent persons. Children might, for example, be given the opportunity to talk with a person independent of their club, group or organisation should they feel that they have been physically, sexually or emotionally abused by an adult or by another child.

Many regulated child care organisations will have already adopted the representations and complaints arrangements set out in regulations made under the Children Act 1989 and the Care Standards Act 2000. In non-regulated settings the procedure for making representations and complaints need not be quite so formal. It might simply involve explaining to any child who comes into contact with an organisation for more than just the odd occasion their right to talk with an independent person, and then giving them the name and contact arrangements. If this were to form part of a more general membership or registration process and were linked to explaining the

other rights and responsibilities the child may have within the organisation, it need not be threatening.

For smaller, local organisations it may be possible to persuade a respected figure in the community, who has demonstrated their trustworthiness, to undertake this task. Whereas in larger organisations a specially designated staff member or volunteer may be an appropriate choice. In all cases, the independent person must be given clear, written guidelines as to what immediate action to take to stop any abuse disclosed by a child, otherwise they might unwittingly permit the abuse to continue. The guidelines should then refer to the organisation's standard procedures for dealing with the disclosure of abuse (see Guideline 6).

Organisations may wish to extend access to the independent person to include junior staff and volunteers. It is possible for them to observe a superior acting suspiciously and not know how to deal with the situation. Guidance on how and with whom they should show their concern should form part of their induction training.

USEFUL PUBLICATIONS AND ADDRESSES

"Safeguarding Children: Working Together under the Children Act 2004" (Welsh Assembly)

A guide to arrangements for interagency co-operation for the safeguarding of children.

NSPCC (NSPCC Public Enquiry Point on: 0207 825 2775):

- Provide services and supporting products to help voluntary and independent community groups and commercial and charitable organisations working with children.
- Educare child protection awareness programmes - a range of interactive, distance learning programmes designed to teach everybody about their role in protecting children
- The Safe Communities Project is a three-year initiative to ensure all children and young people in England and Wales can take part in organised activities safely

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