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PARTNERSHIPS

STAFF/VOLUNTEER CODE OF CONDUCT POLICY

Name of Organisation: Pony Partnerships CIC.

Venue/address for which policy applies: All venues

Date of last review: 31st January 2021

Date of next review: 31st January 2022

Name of author: Danielle Mills

This policy relates to the following documents and policies:

- Health and safety
- Equal opportunities
- Safeguarding
- Behaviour

Background

All adults who come into contact with young people in their work have a duty of care to safeguard and promote their welfare. The Children Act 2004 places a duty on services to safeguard and promote the well-being of young people. This includes the need to ensure that all adults who work with or on behalf of young people are competent, confident and safe to do so. The vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for young people in their care. However, it is recognised that in this area of work, tensions and misunderstandings can occur. It is here that the behaviour of adults can give rise to allegations of abuse being made against them. Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine and there are adults who will deliberately seek out, create or exploit opportunities to abuse children. It is therefore essential that all possible steps are taken to safeguard young people and ensure that the adults working with them are safe to do so.

Some concerns have been raised about the potential vulnerability of adults in this area of work. It has been suggested that there is a need for clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. This document has been produced in response to these concerns and provides practical guidance for anyone who works with, or on behalf of young people regardless of their role, responsibilities or status. It seeks to ensure that the duty to promote and safeguard the well-being of children is in part, achieved by raising awareness of illegal, unsafe and inappropriate behaviours.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that this guidance cannot 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 Pony Partnerships CIC. It is expected that in these circumstances adults will always advise the Directors of the justification for any such action already taken or proposed.

It is also recognised that not all adults who work with young people work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any adult whose work brings them into contact with young people.

The guidance contained in this document has due regard to current legislation and statutory guidance.

Status of Document

This document aims to complement existing professional procedures, protocols and guidance which relate to specific roles, responsibilities or professional practices within an education setting.

Following the publication of Keeping Children Safe in Education (2018) there is a requirement for all providers working with schools to provide staff with Code of Conduct guidance.

Purpose of Guidance

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts.

The guidance aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist adults working with children to work safely and responsibly and to monitor their own standards and practice;
- support managers and employers in setting clear expectations of behaviour and/or codes of practice relevant to the services being provided;
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- support safer recruitment practice;
- minimise the risk of misplaced or malicious allegations made against adults who work with young people;
- reduce the incidence of positions of trust being abused or misused.

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Staff should be familiar with, and know how to access, the Local Safeguarding Children Board's policy and procedures for managing allegations against staff, available online at https://derbyshirescbs.proceduresonline.com/p_alleg_staff_carer_volunteer.html.

Underpinning Principles

- The welfare of the child is paramount.
- It is the responsibility of all adults to safeguard and promote the welfare of young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with young people.
- Adults who work with children 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.
- Adults should work and be seen to work, in an open and transparent way.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.

Definitions

For ease of reading, references are often made to:-

- Young people/Children and Young people: These terms are interchangeable and refer to children who have not yet reached their 18th birthday.
- Adults: References to 'adults', 'staff' or 'volunteers' refer to any adult who is employed, commissioned or contracted to work with or on behalf of young people in either a paid or unpaid capacity.
- The Directors: These terms refer to those adults within Pony Partnerships CIC who have responsibility for managing staff and/or services including the supervision of employees and/or volunteers at any level.

Guidance for Safe Working Practice

Context

Staff at Pony Partnerships CIC have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults establish the safest possible learning and working environments which safeguard children and young people and reduce the risk of adults working with them being falsely accused of improper or unprofessional conduct.

'Unsuitability'

The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with young people.

Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with young people or

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children and young people in any capacity.

Duty of Care

Staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect young people from discrimination and avoidable harm. All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical and emotional harm.

Children 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 the safety and well-being of young people. Failure to do so may be regarded as professional neglect.

The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and young people and behaviour by staff that demonstrates integrity, maturity and good judgement.

The public, local authorities, employers and parents have legitimate expectations about the nature of professional involvement in the lives of young people. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

Employers have a duty of care towards their employees under the Health and Safety at Work Act 1975 which requires them to provide a safe working environment for staff and guidance about safe working practices. Thus, employers have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. Staff who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's duty of care and the staff duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

Confidentiality

Members of staff may have access to confidential information about young people in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a young person and/or their family for their own, or others' advantage (including that of partners, friends, relatives or other services).

Information must never be used to intimidate, humiliate, or embarrass the young person.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child'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

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information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to the designated safeguarding lead.

If a member of staff is in any doubt about whether to share information or keep it confidential they should seek guidance from the Designated safeguarding Lead or the directors. Any media or legal enquiries should be passed to the Directors.

Please refer to the safeguarding policy for guidance regarding concerns related to the Designated Safeguarding Lead or the Directors.

The storing and processing of personal information about young people is governed by the Data Protection Act 1998 and GDPR.

Making a Professional Judgement

This guidance cannot provide a complete checklist of what is or is not appropriate behaviour for adults in all circumstances.

There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists.

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. Such judgements should always be recorded and shared with the directors and with the parent or carer, if the individuals feel it is safe to do so. In undertaking these actions individuals will be seen to be acting reasonably. Adults should always consider whether their actions are warranted, proportionate and safe and applied equitably.

Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working in Pony Partnerships CIC are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

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

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential. Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

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Propriety and Behaviour

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

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

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

The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to young people in the workplace (see DfE Disqualification by Association legislation).

Dress and Appearance

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

Adults who work with young people should ensure they are dressed appropriately for the tasks and the work they undertake. Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

The Use of Personal Living Space

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

It is not appropriate for any provider to expect or request that private living space be used for work with young people.

Gifts

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

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It is acknowledged that there may be specific occasions when adult working with a child or young person may consider it appropriate to give a child or young person a small personal gift of insignificant value. This is only acceptable practice where, in line with the agreed policy, the adult has first discussed the giving of the gift and the reason for it, with the Directors and the parent or carer and the action is recorded.

Any gifts should be given openly and not be based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person. Staff should exercise care when selecting young people for trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when young people are excluded from an activity. Methods of selection and exclusion should always be subject to clear, agreed criteria. Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

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

Infatuations

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

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

Communication with Young people (including the Use of Technology)

Communication between young people and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text/emails, digital cameras/videos/ web-cams, on-line gaming devices, websites and blogs etc.

Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. It is often important for adults to share aspects of their own lives to build a trusting relationship with a young person. Adults should ensure that all communications are transparent and open to scrutiny. Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give or use their personal contact details to young people including email, home or mobile telephone numbers, unless the need to do so is agreed with the Directors and parents/carers beforehand. Email or text communications between an adult and a child/young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through any online media, eg games etc.

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Social Contact

Adults should not establish or seek to establish social contact with young people for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in making a response. In all cases they must report this contact to the Directors. There will be occasions when there are social contacts between young people and staff, where for example the parent and staff member are part of the same social circle. These contacts however, will be easily recognised and openly acknowledged.

Nevertheless, there must be awareness on the part of those working with children and young people that some social contacts, especially where these are not common knowledge can be misconstrued as being part a grooming process. This can also apply to social contacts made through outside interests or through the staff member's own family.

Sexual Contact

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

Any sexual activity between an adult and the child or young person with whom they work will be regarded as a criminal offence and will always be a matter for disciplinary action and referral to the police. All children and young people are protected by specific legal provisions in this respect regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. Any unsolicited pornographic imagery, including child produced sexual imagery, sent by young people to staff must be reported to the Directors and the police immediately.

'Working Together to Safeguard Children 2018' defines sexual abuse as "...forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children."

Grooming

There are occasions when adults embark on a course of behaviour known as 'grooming'
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where the sole purpose is to gain the trust of a child, and manipulate that relationship in order to coerce the child to participate in illegal activity including:

- trafficking illegal substances;
- trafficking vulnerable people;
- modern day slavery;
- child sexual exploitation;
- sexual activity and abuse.

Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with young people, but it is crucial that they only do so in ways appropriate to their professional role.

A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. When physical contact is made with young people this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

Appropriate physical contact will occur most often with younger young people.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the incident book and, if appropriate, a copy placed on the child's file, with the Directors also being informed.

Physical contact, which occurs regularly with an individual child or young person, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to young people with SEN or physical disabilities). Any such contact should be the subject of an agreed and open policy and subject to review. Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible – use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.

The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child. Children with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.

It is recognised that some children may seek inappropriate physical contact. Adults should

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

Behaviour Management

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

Adults should not use any form of degrading treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards young people is not acceptable in any situation.

Any sanctions or rewards used should be part of a behaviour management policy which is widely publicised and regularly reviewed.

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

Where children display difficult or challenging behaviour, adults must follow the behaviour policy outlined by Pony Partnerships CIC and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed and the staff member believes that the safety of the child or other persons (including themselves) is at immediate risk. See Use of Control and Physical Intervention below).

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

Use of Control and Physical Intervention

There are circumstances in which adults working with children displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. This is a complex area and adults and Pony Partnerships CIC must have regard to legislation and government guidance in the development and implementation of their own policies and practice.

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances.

When physical intervention is used it should be undertaken in such a way that maintains the
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safety and dignity of all concerned. The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used, and the techniques deployed in line with recommended policy and practice.

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

In settings where restrictive physical interventions may need to be employed regularly, i.e. where adults are working with children with extreme behaviours associated with learning disability or autistic spectrum disorders, the employer should have a policy on the use of such intervention, as part of a wider behaviour management policy.

Individual care plans, drawn up in consultation with parents/carers and where appropriate, the child, should set out the strategies and techniques to be used and those which should be avoided.

Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

In all cases where physical intervention is employed the incident and subsequent actions should be documented in the incident book and reported to the Directors. This should include written and signed accounts of all those involved, including the child or young person. The parents/carers should be informed the same day.

Children and Young People in Distress

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

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

First Aid and Administration of Medication

Health and safety legislation places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first-aid arrangements. Any employee may volunteer to undertake this task but it is not a contractual requirement and appropriate training should be given before an individual takes on a role which may require administering first aid or medication.

Some young people may need medication during provision hours. In circumstances where children need medication regularly a health care plan should be drawn up to ensure the safety and protection of young people and staff. With the permission of parents, children

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should be encouraged to self-administer medication or treatment including, for example any ointment, sun cream or use of inhalers.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a client, this should be discussed with the Directors at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents should always be informed when first aid has been administered.

One-to-One Situations

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

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

Pre-arranged meetings with young people away from Pony Partnerships premises are not permitted unless approval is obtained from their parent and the Directors.

Home Visits

All work with young people and parents should, wherever possible, be undertaken at the contracting service or at Pony Partnerships CIC

There are however occasions, in response to urgent or specific situations where it is necessary to make one-off home visits. In these circumstances it is essential that appropriate policies and related risk assessments are in place to safeguard young people and the adults who work with them.

A risk assessment should include an evaluation of any known or anticipated factors regarding the child/young person, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make adults more vulnerable to an allegation. Specific consideration should be given to visits outside of 'office hours' or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place before visits are agreed. Where little or no information is available, visits should not be made alone.

Transporting Young people

Adults, who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

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

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

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

Photography and Videos

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

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

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

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

It is recommended that when using a photograph the following guidance should be followed:

- if the photograph is used, avoid naming the person
- if the person is named, avoid using their photograph
- the Directors should establish whether the image will be retained for further use
- images should be securely stored in accordance with GDPR and the Privacy Policy and used only by those authorised to do so.

Access to Inappropriate Images and Internet Usage

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children is illegal.

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This will lead to criminal investigation and the individual being barred from working with young people, if proven.

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

Sharing Concerns and Recording Incidents

Individuals should be aware of Pony Partnerships safeguarding procedures, including procedures for dealing with allegations against adults. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance. Adults who are the subject of allegations are advised to contact their professional association. In the event of any allegation being made, to someone other than a manager, information should be clearly and promptly recorded and reported to the Directors without delay. Adults should always feel able to discuss with the Directors any difficulties or problems that may affect their relationship with young people so that appropriate support can be provided or action can be taken.

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

Animal Welfare

Staff on duty are competent in the care and welfare of the animals exhibited and have a recognised qualification and/or suitable and demonstrable experience/training, including working within the environment in question (equine facilitated therapeutic activities, youth work, mental health).

Suitable and sufficient training of staff involved in animal care have been carried out in the following areas:

- animal welfare, including recognising poor welfare;
- animal handling;
- animal behaviour;
- cleanliness and hygiene;
- feeding and food preparation;
- disease and zoonosis control;
- recognition of sick animals and abnormalities.

Staff must have:

- a recognised training qualification in equine facilitated therapeutic activities from a recognised provider that incorporates equine management in their course materials
- a current enhanced DBS certificate
- minimum of level 2 safeguarding training, updated every year
- PREVENT training, updated every 2 years

Staff will participate in:



- monthly management supervision
- external clinical supervision
- annual appraisal
- planned continued professional development
- evidence of staff attendance or completion of the training will be logged in the single central record.

At induction, staff will be given training on current policies and procedures. This will include:

- care of animals
- emergency procedures
- safeguarding
- health and safety

