

Care and Protection Policy and Procedures

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1. Introduction

Hot Chocolate Trust is committed to the well-being of every individual and works to safeguard the welfare of every person who is involved.

All young people we work with have the right to be safeguarded against neglect, abuse, exploitation, or other situations that may place them at risk. Hot Chocolate Trust works to create a safe, protective and caring environment for young people who benefit from Hot Chocolate's activities.

Many of the young people involved with Hot Chocolate describe it as a "safe place" and say that it "feels like home." This Policy describes how we can continue to make young people feel secure, safe and cared for when we are working with them, and work to safeguard them from risk, abuse and exploitation.

2. Who is responsible?

The care and protection of young people is the responsibility of everyone in Hot Chocolate. Care & Protection processes and practices are covered in youth work inductions, ongoing team debriefs, and regular team training.

To help us to be effective in our individual and shared responsibilities we have appointed the following roles.

Care & Protection Lead: Eilaine Coffey, Youth Work Manager (Complex Needs Lead)

Care and Protection Digital Lead: Andy Robertson, Creative Arts Lead

PVG Lead Signatory: Dave Close, Executive Director

You can make contact with any of these staff via our website, on 01832 223 880, or through admin@hotchocolate.org.uk

There is a monthly 'Young People at Risk' Group, to monitor, reflect on, coordinate and respond to Care & Protection scenarios. This group is led by the Youth Work Manager (Complex Needs Lead), and also includes the Executive Director, Assistant Director, Senior Youth Worker, Creative Arts Lead and Volunteer Coordinator.

3. Recording C&P concerns

If any team member has concerns for a young person, however these have arisen, they will record and share it in one of three ways shown below.

Database	For normal, low-level concerns about well-being it is sufficient to note these in debrief and database recordings. These will be reviewed by the Session Leader, for open sessions, and/or Senior Youth Workers.
Niggle Form	If the team member feels the concern might be more serious, or the concern is serious but they have no clear evidence to back it up at this point, then the team member will record this on a Niggle Form which will be left in the secure digital post box on SharePoint for the Youth Work Manager. In open sessions the team member will, as a matter of course, also discuss the concern with the Session Leader.
C&P Concern Form	If a team member has concerns based on a disclosure from a young person, or based on other clear evidence, of serious actual or potential risk to a young person, then they will record this on a Care and Protection Concern Form which will be left in the secure digital post box on SharePoint for the Youth Work Manager. In open sessions the team member will, as a matter of course, also discuss the concern with the Session Leader.

It is important that team records the actual words of the young person, including any swear words, slang or sexualised language, and avoids making assumptions. There is accompanying guidance for using the C&P forms, on SharePoint.

C&P Concern forms and Niggle forms will be picked up the next day by the Youth Work Manager who will record this on the C&P Cover Sheet on SharePoint. They will plan, record and lead the appropriate response and store these recordings in a secure folder on SharePoint. They will pass on concerns to child protection agencies (e.g., social work dept, police) whenever this is appropriate.

The Youth Work Manager will liaise as needed with the Executive Director and/or Assistant Director for support or advice in response to Care and Protection concerns and niggles. All concerns and responses are reviewed each month at the Young People at Risk meeting. When a concern is resolved the records will be kept in the secure folder in case future reference is needed.

4. Safe Recruitment

Hot Chocolate Trust build significant relationships with young people and have the privilege of being trusted by them. We are determined that everyone who works for Hot Chocolate will be committed to the well-being of the young people and that we minimize opportunity for anyone to exploit that position of trust. We are therefore diligent to ensure that team members are carefully selected and screened and well trained, supported and supervised in their ongoing work.

As is explained fully in HCT's Recruiting People with Convictions Policy, having a criminal record does not necessarily mean that someone cannot work or volunteer for our organisation. We operate a fair recruitment process and will ensure anyone applying for or holding a role in our organisation is given the opportunity to discuss any unspent convictions which they are required to tell us about.

Volunteer Youth Workers

Most of the people who work with young people in Hot Chocolate are volunteers, and their responsibilities constitute regulated work, so we will consider their recruitment first.

Volunteers come from a range of backgrounds; some have had previous connections with Hot Chocolate, or with current team, and others are entirely new to us. All go through the same process to discern whether a role working with young people here is appropriate for them and to vet their suitability for that role.

1. A potential volunteer will meet, first, with the Volunteer Coordinator to discuss Hot Chocolate's youth work and approaches, and their experience and reasons for considering volunteering.
2. Next, they will visit one or two Open Sessions during which they will be paired up with a fully vetted team member.
3. They will meet again with the Volunteer Coordinator to decide together whether to progress as a volunteer.
4. The Volunteer Coordinator, or another nominated Team Member, will then lead the provisional volunteer through a 4-part Induction Process
 - a. *The deep end*: Reflecting on your visit, youth work essentials, expectations, concerns and boundaries, confidentiality, care and protection, and important volunteering paperwork.
 - b. *HC and me*: Reflecting on your first session, the background/ethos/values of Hot Chocolate, your own values, skills and interests and where you might fit in and develop.
 - c. *Down with the kids?* Reflecting on your second session, youth work approaches and scenarios, starting conversations and challenging behaviour.
 - d. *So what? And who cares?* Reflecting on your third session, the difference we want to make, the significance of debrief, what a significant conversation is, and why we have a database, as well as meeting the chocolatiers.

5. While a potential volunteer is awaiting the return of their PVG check and is working their way through the induction process they will be involved in open sessions but not as a full team member. They will continue to be paired up with a fully vetted team member in all youth work so their engagements with young people will be supervised.
6. At or before the first induction meeting the Volunteer Coordinator and provisional volunteer will complete a PVG application and this will be submitted immediately.
7. The provisional volunteer will also complete a Hot Chocolate Volunteer Application Form and, from this, the Volunteer Coordinator will seek two independent references.
8. If the provisional volunteer has engaged positively with the induction process, has functioned well within the Open Session teams, and the PVG statement and references received hold no information to suggest any concern then they will be appointed as a Volunteer Youth Worker.
9. If the PVG statement includes information about past convictions, charges or concerns, or the references raise concerns then this information will be considered according to the template shown in Appendix F.
10. Hot Chocolate Trust will only appoint people to Youth work roles when we are confident that this serves the best interests of the young people.

Volunteers in other roles

Sometimes a volunteer may wish to support Hot Chocolate's work but in a non-youth work role. In this case the route of assessment and appointment will vary according to the role and commitment. For example, some people bake cakes for team and young people each summer – it would be disproportionate to ask them to meet with the Volunteer Coordinator first.

However, in every case the staff member responsible for the area of work in which the volunteer will support must consider the following:

- Are the tasks, time commitment and purpose all clear and agreed with the volunteer?
- Do any of the tasks agreed with the volunteer constitute regulated work as defined in the Protection of Vulnerable Groups (Scotland) Act 2007? If so, the Volunteer Coordinator will lead the prospective volunteer through the PVG process before they take up the role.
- Does the volunteer know who they will be accountable to and supported by? Have both people agreed their respective responsibilities?
- Is it useful to go through the standard induction process including care and protection training? If not, what induction or support will be more appropriate?
- How will both people know that the role has finished? What learning can be captured at this point?

Hot Chocolate Trust is a children's charity, in the terms of PVG guidance, and the principal means of delivery of benefits is by workers doing regulated work. This means that the Trustees or Board Members of Hot Chocolate Trust are also doing regulated work and therefore are screened through the PVG system accordingly.

Employees

When a role is created it will be assessed to determine whether it constitutes regulated work as defined in the Protection of Vulnerable Groups (Scotland) Act 2007. If not, then the normal, careful Hot Chocolate recruitment process will be followed (including an appropriate self-disclosure statement regarding criminal offenses) and the new employee's responsibilities for the care and protection of young people under this policy will, nonetheless, be part of their induction. If so, it will be noted in the advertisement or job pack that the appointment is subject to disclosure records through the PVG scheme.

The recruitment process will be shaped according to the role in question but will include an application form (with appropriate self-disclosure statement regarding criminal offenses), references, and assessment process. An offer of appointment, for a role including regulated work, will be made subject to disclosure records through the PVG scheme and the Executive Director will ensure that this process is begun immediately.

The role will not normally begin before the disclosure record is received. If the disclosure record is clear, then the appointment will be confirmed and the employee begin their role. If the disclosure record contains further information, then this will be considered according to the template in Appendix F and a decision made whether or not to appoint.

In exceptional circumstances it may be desirable for the employee to begin induction and work on a restricted and supervised basis after the disclosure application has been submitted but while a decision is still pending. The reasons for and conditions of this start will be recorded in writing and signed on behalf of Hot Chocolate Trust and by the new employee. If the disclosure record is clear, then the appointment will be confirmed and restrictions removed. If the disclosure record contains further information, then this will be considered according to the template in Appendix F and a decision made whether to cease or continue employment.

Independent Contractors

When a role is created, and the contract drawn up, it will be assessed to determine whether it constitutes regulated work as defined in the Protection of Vulnerable Groups (Scotland) Act 2007. If so, then the contract will be offered subject to presentation of their PVG Scheme membership. If they are not yet members of the PVG scheme their point of contact in Hot Chocolate will assist them in applying.

The contract will not normally begin before the disclosure record is received. If the disclosure record is clear, then the appointment will be confirmed and the contractor begin their work. If the disclosure record contains further information, then this will be considered according to the template in Appendix F and a decision made whether or not to appoint.

In exceptional circumstances it may be desirable for the contractor to begin the project and work on a restricted and supervised basis after the disclosure application has been submitted but while a decision is still pending. The reasons for and conditions of this start will be recorded in writing and signed on behalf of Hot Chocolate Trust and by the contractor. If the disclosure record is clear, then the appointment will be confirmed and restrictions removed. If the disclosure record contains

further information, then this will be considered according to the template in Appendix F and a decision made whether to cease or continue the contract.

If the work of an independent contractor does not constitute regulated work as defined by the Protection of Vulnerable Groups (Scotland) Act 2007, then Hot Chocolate will apply their normal process of assessment to ensure the best appointment. The staff member responsible for the project must consider whether it is useful to go through the standard induction process including care and protection training? If not, what induction or support will be more appropriate?

5. PVG: including secure data handling & recruiting people with convictions

This policy applies to regulated work with children or protected adults as defined in the Protection of Vulnerable Groups (Scotland) Act 2007. Because of the age range at Hot Chocolate a majority of the young people with whom we work are children (aged under 18), some are protected adults, some fulfil both sets of criteria simultaneously, and there are some who fall into neither of these categories. Whilst the processes of the PVG scheme must apply differently for these different groups the standards of care and practice which Hot Chocolate upholds apply to all of them – hence the use throughout this document of the collective term “young people”.

There are currently no roles in Hot Chocolate which involve support of protected adults but not children. Additionally, although Hot Chocolate’s work fulfils the criteria of a welfare service with protected adults this work also meets the description of incidental work in being open to all (within the age criteria), attractive to a wide cross-section, and with discretionary attendance. When screening team through PVG systems therefore we screen for work with children which anyway forms the large majority of our work.

For the purpose of this policy, PVG Scheme Records, PVG Scheme Record Updates, Standard and Enhanced disclosures will be referred to as Disclosure Records.

It is an offence for an individual who is barred to undertake the type of regulated work from which they are barred.

It is an offence for an organisation to offer regulated work to someone who is barred or fail to remove a person from regulated work if they have been notified that they are barred.

It is an offence for an organisation not to refer an individual to Disclosure Scotland where the grounds have been met.

Secure Handling, Use, Storage and Retention of PVG/Disclosure Information

In accordance with the Scottish Government Code of Practice, for registered persons and other recipients of disclosure information, Hot Chocolate Trust will ensure the following practice.

Disclosure records will only be requested when necessary and relevant to a particular post and the information provided on a disclosure record will only be used for recruitment purposes. Further detail of how this information might be used is in Appendix F on p26 of this policy.

The Lead Signatory/Executive Director will ensure that an individual’s consent is given before seeking a disclosure record, and will seek their consent before using disclosure information for any purpose other than recruitment. Furthermore, The Lead Signatory/Executive Director will ensure that all sensitive personal information that is collated for the purposes of obtaining a record will be managed confidentially at all times by those involved in the Disclosure process.

Disclosure information will only be shared with those authorised to see it in the course of their duties.

Disclosure information will be stored, from the point of first receipt from Royal Mail, in a locked box, used only for this purpose, in a locked non-portable cupboard, and we will not retain such information for longer than needed. Only those authorised to see this information in the course of their duties will have access to this container. Disclosure information will be destroyed by shredding within three months and no image or photocopy may be retained. Hot Chocolate Trust will, however, keep a record of the following:

- Date of issue of disclosure record
- Name of subject
- Disclosure type
- Position for which the disclosure was requested
- Unique reference number of disclosure
- Recruitment decision taken

Hot Chocolate Trust will ensure that all staff with access to disclosure information are aware of this policy and have received relevant training and support. We will make a copy of this policy available to any applicant for a post with Hot Chocolate Trust that requires a Disclosure.

In the unlikely scenario that a disclosure statement were to be lost before it is destroyed, then we will seek guidance from the Information Commissioner, and inform the subject of the disclosure and the Information Commissioner as required.

Disclosure records of Hot Chocolate team are renewed every three years. A schedule noting the date a renewal check is due for each team member in regulated work is jointly maintained by the Volunteer Manager and Administrator/Book-keeper. If a person is still linked to HCT for PVG purposes but is no longer doing regulated work for us then we will notify Disclosure Scotland of this.

New checks for volunteers will be administrated by the Volunteer Coordinator; new checks for employees, trustees and independent contractors will be administrated by the Executive Director or Administrator/Book-keeper.

The individual who is the subject of the disclosure is responsible to notify Disclosure Scotland of changes to their name or address.

Recruiting People with Convictions

Hot Chocolate Trust adopted a new Policy on Recruiting People with Convictions in November 2020. This aims to provide assurance to applicants, staff and volunteers, and guidance to those making recruitment decisions, of our organisation's process in assessing whether any conviction information provided to us, either through self-disclosure or in a disclosure certificate, impacts on a person's ability to carry out the role that they have applied for or which they hold within our organisation.

It is important to recognise that having a criminal record does not necessarily mean that someone cannot work or volunteer for our organisation. Hot Chocolate Trust treats all applicants fairly and

consistently in accordance with the requirements of Rehabilitation of Offenders Act 1974 (as amended). We do not differentiate between paid and unpaid roles when applying the criteria detailed in this policy, the assessment is based entirely on the requirements of the role and any information shared with us either through self-disclosure or contained in a disclosure certificate. The level of disclosure which we will access will be the appropriate level for the role (basic, standard, enhanced or PVG). The full policy is available from Hot Chocolate Trust.

6. Care & Protection Support for Team

Complex Needs Group

As well as the monthly Young People At Risk group, to ensure management oversight, there is also a monthly Complex Needs meeting for youth work practitioners to reflect on and respond to specific youth work scenarios they are working with.

Support & Supervision

Staff and volunteers meet with their line managers on a monthly basis, and are encouraged to reflect on examples from their practice, to help them grow their knowledge, skill and confidence.

Training

All regular team members, voluntary or employed, will cover Care and Protection Policy and Hot Chocolate's practice requirements and guidelines as part of their induction. All team members will have opportunities to pursue further training, both externally and internally, to develop their skills and awareness. For some roles further training will be essential. Team in youth work roles will refresh or deepen their training in care and protection once a year. Attendance records are held by the Youth Work Manager.

On Call

There is an on-call rota, whereby senior managers are available for support and advice if needed, whenever youth work is taking place.

Emergency contacts

All team are asked to save key emergency phone numbers on their mobile phones, and encouraged to use these in the event of emergencies:

- Non-emergency police: 101
- Emergency police: 999
- NHS 24: 111
- Ambulance: 999
- Talk to Frank (Drugs Helpline): 0300 1236600
- Social work: 01382 307 999 (24 hours)

7. Allegations against a team member

Hot Chocolate Trust is committed in all circumstances to prioritizing the welfare, and protection from harm, of young people and this will lead our response to any allegations.

Principles of raising concerns

- You do not need to have irrefutable evidence to raise a concern. If you feel uncomfortable with what you have witnessed, or been told, report it in the best way you can.
- If you raise a genuine concern under this policy, you will not be at risk of suffering any form of retribution as a result and Hot Chocolate Trust will not tolerate anyone attempting to stop you, victimise you or otherwise take action against you in any way.
- Providing you are acting in good faith; it does not matter if you are mistaken. However, we will not accept people raising matters maliciously that they know are untrue.
- HCT will ensure protection to your confidentiality and identity wherever possible.
- Team members may be accompanied by a colleague at any time when raising concerns; anyone else raising concerns may be accompanied by a person of their choice.
- Whoever is looking at your concern will ensure that it is investigated and addressed appropriately, which may mean immediate referral to a higher level. You will be kept informed where possible of all developments.

Internal or external reports

Hot Chocolate Trust always seeks to involve appropriate external agencies in situations relating to the protection of children or vulnerable adults. We therefore strongly advise that anyone with a concern should first talk to their line manager (for HCT Team), or a senior staff member (e.g., Youth Work Manager who is our Care & Protection lead) or the Chairperson/another Director before reporting your concerns to another organisation. See the list of responsible persons on page 3 for contact details.

Please be certain that you have exhausted all internal options and that you are sure that your intentions are right before considering reporting your concerns to an external agency.

Stage 1 – Reporting

Team members may raise any concerns with their line manager (for volunteers - the Volunteer Coordinator) or with the Youth Work Manager. If the concern is more urgent, for example in an Open Session when there is a fear of imminent harm then the concern should be raised immediately with the Session Leader. If this is not possible then there is a list, in the Main Office, of phone numbers of Senior Staff who can respond in emergency. For the avoidance of doubt, if a team member has concern of imminent harm to a young person, they should not wait but immediately consult with the most senior team member present or contactable by telephone in order to act promptly in contacting child protection agencies (e.g., social work, police).

The standard reporting process using the Niggle Forms or C&P Concern Forms described above will usually be the most appropriate way to communicate a concern.

Anyone with a concern can contact the Youth Work Manager, Eilaine Coffey; Executive Director, Dave Close; or Assistant Director, Charis Robertson.

Stage 2 - Investigation

The Youth Work Manager, Executive Director or Assistant Director will arrange a thorough investigation of the matter including consideration of whether and how any external body (e.g., police or social work department) should be informed. The consistent priority will be the safety and protection of young people.

Any investigations will be carried out in accordance with the principles set out above. Conversations in the course of investigation will be noted and the notes agreed, wherever possible, or the persons involved may be asked to provide a written statement.

The person leading the investigation will then report to the Executive Director, or the Chair of Directors, who will oversee any necessary action, including disciplinary action or reporting the matter to any appropriate statutory body or regulatory agency.

On conclusion of any investigation, the person raising the complaint and the subject of the complaint will be informed of the outcome of the investigation and the actions taken by the organization. If no action is to be taken, the reason for this will be explained.

Stage 3

If the person raising the complaint is concerned that the person investigating is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome of investigations to the Board, they should inform the Chair of the Board of Directors, who will arrange for another manager or Trustee to review the investigation carried out, make any necessary enquiries and make their own report to the Board as in stage 2 above.

Stage 4

If, on conclusion of stages 1, 2 and 3 the person raising the complaint reasonably believes that the appropriate action has not been taken, they should report the matter to the proper person or authority. In cases concerning the Care and protection of children or vulnerable adults this would normally be the Police or Social Work Dept.

False Reporting

There may be instances where a report is made, based on a genuine belief by the employee or volunteer that something is wrong at a particular time, which is subsequently demonstrated to be false or inaccurate. In such circumstances, the employee or volunteer will be informed of the discrepancy between their report and the facts at hand. When the employee or volunteer acted in good faith and had a genuine belief that such a situation should be reported, this will be affirmed and no further action will be taken.

If it becomes apparent to the investigating staff or Directors that an employee or volunteer making the disclosure has acted maliciously or frivolously, or has acted for personal gain, this will be dealt with through the Disciplinary Procedure.

8. Boundary breaches

Hot Chocolate expect all team members to maintain clear, professional boundaries in their relationships with young people. These are a key element in keeping young people safe. The boundaries themselves are explored in more detail in the “It depends” section of the Induction handbook. See also Appendix G to this policy: Responding to Boundary Breaches.

From time to time these boundaries are breached or scenarios arise where team are genuinely uncertain about what is appropriate. In all cases we would expect a team member to take the initiative to inform us as soon as possible of any interactions with young people which might cross these lines. We will respond as follows.

1. The Volunteer Coordinator, or line manager of paid staff member, would normally have the first conversation. If there has been only uncertainty but no risk to young people or deliberate breach of boundaries then this conversation, reminding the team member of the Induction guidance and helping them to interpret this appropriately, will be sufficient. The incident and conversation should be recorded and kept in the team member’s records.
2. If there is potential risk to a young person, deliberate breach of boundaries or we are not confident that the team member is sharing all relevant information then we will meet with the team member, as soon as possible and usually within three working days, to investigate what happened.
 - a. In the case of volunteers this meeting would be led by the Volunteer Coordinator and one of Executive Director, Assistant Director (Development), or Youth Work Manager.
 - b. In the case of paid staff, it would be led by one of Executive Director/Assistant Director/Chair of Board and the most appropriate senior staff member.
3. Recognizing that sometimes such situations can involve difficult conversations we will invite the team member to be accompanied by another team member of their choice.
4. The meeting, and subsequent process, will aim to uphold three principles:
 - a. To protect young people from harm or risk of harm.
 - b. To maintain Hot Chocolate Trust’s capacity and effectiveness to support young people.
 - c. To support the Hot Chocolate team who carry out that work.

If there is any conflict between these principles in practice, then the welfare of young people and their protection will always be the first priority.

5. We will agree specific points of contact to follow this meeting. Next actions may not be decided yet, for example, but we will let the team member know when we will be in touch or when we would like to meet again, as soon as possible and usually within ten working days.

6. The situation will then be reviewed, as soon as possible and usually within ten working days, by an Oversight Group comprising at least three of Executive Director, Assistant Director (Development), Youth Work Manager, Volunteer Coordinator or Chair of Board. In agreeing a clearly planned response they will consider (n.b. this is not exhaustive):
 - a. Does this situation indicate harm or imminent harm to any young person is likely? If so, what immediate actions are needed to mitigate this?
 - b. Does this situation indicate harm or imminent harm to any team member is likely? If so, what immediate actions are needed to mitigate this?
 - c. Is there any evidence or concern which should be communicated either to Social Work Dept or to the Police? If so, who will do this?
 - d. How can the accounts of others involved, especially young people, be heard?
 - e. What support is needed for any young people involved?
 - f. What restrictions should be placed and what support offered to the team member while the situation is investigated?
 - g. Where should confidentiality boundaries be drawn and what do other team need to know?
 - h. Do we need to meet again with the team member to investigate any details further?
7. Once the situation has been appropriately investigated the Oversight Group will agree the necessary actions, including communication, sanction, support, and who will take these.
8. If there is a decision to remove a team member from working with young people then the Oversight Group will also decide whether any further actions are needed, including our responsibilities under the PVG scheme.
9. If the team member is unhappy with the process or decision they may appeal, as soon as possible and usually within 28 days, to the Hot Chocolate Board, either through the Chair person, currently Chris Lafferty, or if she has been involved in the process through the Vice-Chair (and Chair of the People & Development Sub-Group), currently Pam Mellstrom. They will review the process, with a second Director assisting, and meet with the team member, before giving their recommendation of any further or alternative actions in writing to both the team member and the Executive Director.

9. Making a Referral under the PVG Scheme

This policy is relevant to all those involved in making recruitment/disciplinary decisions in our organisation.

When a volunteer or member of staff is permanently removed from a regulated work position, there are certain circumstances where Hot Chocolate must notify the Protection Unit at Disclosure Scotland that this has happened. This is called “Making a Referral”. If we would have permanently removed the individual, the actions detailed in this policy will continue to apply even if a member of staff or volunteer leaves their regulated work position prior to any action being taken, irrespective of the reason that they leave.

Two conditions must be met before we let Disclosure Scotland know that something has happened.

Condition 1 – A person has been permanently removed/removed themselves from regulated work

Condition 2 – At least 1 of the following 5 grounds apply

- Caused harm to a child or protected adult
- Placed someone at risk of harm
- Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

When both of these conditions have been met, it is a legal requirement that we must make a referral to Disclosure Scotland within 3 months of the permanent removal of the individual.

Where there is an historical allegation of harm or inappropriate behaviour about someone who is no longer in regulated work with us but which we believe would, in all probability, have led to the 2 conditions being met, we will consider whether we want to make a referral but the legal responsibility applies only after 28 February 2011 when PVG was first introduced.

Where it is necessary to make a referral, this process will be carried out by the Executive Director. In their absence, the referral process will be carried out by the Assistant Director or Care & Protection Lead. Those who are in a position which may involve carrying out disciplinary action which may result in the removal from regulated work or dismissal of someone in regulated work must ensure they notify the Executive Director or, in their absence, the Assistant Director or Care & Protection Lead of the legal requirement to make a referral where the conditions above have been met.

Failure to make a referral where required, may result in our organisation being prosecuted. It is therefore essential that those involved in carrying out disciplinary action notify the Executive Director or the Assistant Director or Care & Protection Lead when both conditions for making a referral have been met.

APPENDIX: Digital Youth Work Policy

Context

“Think about it: The pace of change has never been so fast, and it will never be this slow again”.

Justin Trudeau

As of 2020, the Covid-19 lockdown has made us completely rethink and reshape our digital offering. It is clear to us that digital is a vital way to connect, engage, and make support available to young people. We have learned much in responding to this crisis and digital poses both great possibility and significant challenges to overcome and risks to minimise.

Research shows that vulnerable young people are more likely to be cyberbullied, self-harm, sext, have upsetting online experiences, spend extended hours online, or have their social media hacked (internetmatters.org). Safeguarding young people will be central to all our digital youth work practice, and we should be clear and confident about how we will enable this in a trauma-informed way. A key question for us is:

“What do young people need (from us) to be safe and empowered online?”

Responsibilities for overseeing online youth work at HCT

- Care and Protection Digital Lead - Andy Robertson
- Overall Care and Protection Lead - Eilaine Coffey
- Digital Development Team - Nicole Ritchie, Ryan Glen, Georgia Doak

Any significant concerns, changes, new practices, and digital ideas should be brought to either Andy R or Eilaine.

Key principles for digital youth work

1. Design for online behaviour – Behaviours can be different online and therefore so can risks: e.g., disinhibition may make disclosure more likely, lack of physical cues may hinder social skills and communication, anonymity may shift the way young people treat each other.
2. Design for privacy – We want the young people to be informed, respected and know their rights.
3. Design for consent – We will pay attention to permissions and never assume consent.
4. Design for info security – We need to think about GDPR and young people’s access to data.
5. Design for accessibility – Ease of use in both language, imagery and content.
6. Design to guide staff – Supporting and training staff to be able to recognise and respond effectively to risk online.

Consent

Consent must be gained from young people before we share any images of them (under 16s require parental consent), or any quotes, artwork, or content attributed to them.

Never assume that we have their consent to engage them online – keep checking in, and respect their choices. It is helpful to draw a parallel with detached work – we are always seeking to read them to see if it's okay and they want to connect/chat etc.

Remember that even though it may be our account, it is not our space – if we are asking young people to engage in a platform they don't already use, we are effectively asking them to agree to the company's terms and conditions, so we need to be ready to advise and explore how to keep themselves safe through both settings and use.

Managing Relationships

We need to keep the young people and team safe – therefore we need to pay attention to our professional boundaries and accountability.

Managing Digital Risks

Digital risks fall into two categories – online and offline risks.

Online risks include risks directly resulting from use of digital platforms – e.g., a young person's connection fails when disclosing, a young person is bullied during a digital session, a team member is sent inappropriate images etc.

We will work to ensure that our online spaces are as safe as possible for young people, including:

- Assessing risk at the point of platform development:
 - ensuring privacy settings are robust and set appropriately,
 - training team in how to manage groups and individual communications online, and to keep appropriate boundaries
- Assessing risk at the point of practice:
 - setting expectations with users,
 - responding quickly to challenge inappropriate or bullying behaviour,
 - reminding/talking about young people's rights and how we use their info.

We will work with young people to help support them around care and protection issues, and minimise risk (such as safety plans and finding safe spaces to engage online), to know when we may need to share information regarding their safety, and will be alert to warnings and indications of potential risk in the same way that we would during physical youth work. Reporting and recording of C&P incidents/Niggles follow the same process as physical C&P policy, although we may look to additional sources of support and advice (see resources), and it may be important to record evidence e.g., screenshots of messages etc. We will, of course, strive to work with the young person

involved wherever possible, and will be transparent with them around any actions taken for their protection.

Team Training and Support

Team will provide opportunities for training around digital youth work/safeguarding at least once a year, covering technical practicalities of different platforms, digital youth work practice, and care and protection scenarios. Team with named responsibilities will stay up to date through external training, and will offer bespoke support for team dealing with complex situations online, or seeking technical advice to enhance their digital youth work confidence.

Breaches of digital policy.

Any breach of policy will be taken seriously, whether contacting a young person through personal social media, or through publishing images of young people without consent.

This will happen in line with our boundary breaches policy above. If you feel that you may have crossed a boundary, please do come and talk to team and we will work out a plan together of what needs to happen and how we can move forward.

Useful Resources

- Report harmful content
<https://reportharmfulcontent.com/>
- Professionals online safety helpline
<https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline>
- Vulnerable Children in a Digital World research
<https://www.internetmatters.org/about-us/vulnerable-children-in-a-digital-world-report/>
- Network and data security
<https://digisafe.com/>