



**Child & Vulnerable Adults
Protection Policy
2009 – 2012**

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1 Introduction

Museum of London recognises its responsibility to ensure that a safe environment is provided for all children and vulnerable adults taking part in its activities. This policy specifies how we will provide a safe environment and protect children and vulnerable adults while they are taking part in Museum events, projects and other activities. It aims to protect Museum staff, freelancers and volunteers (referred to as 'staff' throughout this document) from situations where they may feel threatened or open to suspicion or accusation. It also provides a procedure for dealing with situations where abuse or inappropriate behaviour is witnessed by or disclosed to staff.

It is the responsibility of individual members of staff, freelancers and volunteers to understand the content of this policy, to ensure that it is followed, and to report any breaches of policy to the Head of Human Resources.

This policy covers the following Museum activities:

- recruitment of Museum staff
- recruitment of freelancers, volunteers, placement students and work experience pupils
- adult, family, early years and schools events where staff, freelancers or volunteers come into direct contact with children or vulnerable adults at the Museum
- community projects where staff, freelancers or volunteers come into direct contact with children or vulnerable adults at the Museum
- outreach projects (with community groups and schools) where staff, freelancers or volunteers come into direct contact with children or vulnerable adults at non-Museum venues
- web-based projects such as the development and management of websites, videoconferencing, web-casting, social networking, user generated content etc
- e-learning sessions during which visitors use digital technologies such as video and digital cameras
- access to databases that include the personal contact details of children or vulnerable adults
- contact between staff and people from outside the organisation, at the Museum or elsewhere.

For the purposes of this policy:

- children are defined as young people under the age of 18
- vulnerable adults are defined as people over the age of 18 who are or may be in need of community care services because of age, illness, physical or learning

disability, or those who are unable to take care of or protect themselves against harm or exploitation (including those for whom English is an additional language)

- responsible adults are defined as people over the age of 18 who assume responsibility for children or vulnerable adults during the Museum activity (eg teachers, parents and group leaders). However, we recognise that some parents may be under the age of 18 and will be responsible for their children while in the Museum.

This policy was approved by the Board in November 2009 and will be reviewed every three years, or more frequently if necessary. The next review is due in November 2012.

2 Recruitment procedures

From July 2010 all staff who have contact with children or vulnerable adults and are involved in regulated activity as defined by the Safeguarding Vulnerable Groups Act (2006) will be subject to an Independent Safeguarding Authority (ISA) registration check. If they are not already on the ISA register then an enhanced Criminal Records Bureau (CRB) check will be carried out as part of their registration. Until the register is established in July 2010, an enhanced CRB check will be carried out. From November 2010 it will be illegal to employ a person involved in regulated activities who is not on the ISA register.

Any third party organisations that the Museum commissions to deliver activities with children or vulnerable adults are required to provide evidence that their employees are on the ISA register (or, if pre July 2010, have been subject to an enhanced CRB check).

All members of staff are given a personal copy of this policy (and will sign a form to say that this is the case) before taking up their duties, and are informed in writing of any changes to this policy. Any member of staff who feels that this policy needs to be added to or changed in any way should contact the Head of Learning.

All staff, regardless of whether their work will bring them into contact with children or vulnerable adults, will sign a declaration before taking up their duties stating whether they have any criminal convictions or pending convictions, and appropriate checks may be carried out on the basis of this information.

3 Responsible adults

Staff must not take responsibility for children or vulnerable adults, ie a responsible adult should be present at all times during the activity (with the exception of children aged 14 and over, see point 4 below). Staff must never be alone with individual children or vulnerable adults, and should avoid situations where they cannot be clearly seen. A responsible adult should be present at all times. Staff must not take children or vulnerable adults to the toilet, either as individuals or groups. This should be done by responsible adults.

4 Unaccompanied children

Visits by unaccompanied children under the age of 14 are discouraged. Children aged 14 and over are welcome to take part in activities (eg family events) without a responsible adult. If an issue arises then their parents/carers will be contacted by telephone. Unaccompanied children are closely monitored by gallery as they move around the building staff to ensure their safety.

5 School pupils on work placements

The Museum regularly provides work experience placements to school pupils who are under the age of 18. It is vital that the pupils are supervised by a member of staff who has been subject to an enhanced CRB check/is on the ISA register and that they are not left alone with anyone who has not been subject to the same level of security checks. The supervisor must ensure that the pupil is not put at risk. Prior to the placement they should also obtain the telephone number and other contact details of the teacher at the pupil's school who is responsible for work experience placements, and of the pupil's responsible adult (ie a parent or carer), so that they can be contacted should any issues arise or in the case of an emergency.

6 Lost children

Any children or vulnerable adults who become separated from their responsible adult will be taken to the Security office by a member of staff and the Duty Manager will be informed. Announcements will then be made on the Museum's PA system and the responsible adult asked (by name) to report to the Security Desk. If there is any doubt about the identity of the responsible adult (eg if the child does not recognise them), or if a responsible adult does not come forward, the relevant authorities (eg the police and social services) will be informed.

7 Family events and adults without children

Adults without children are discouraged from taking part in family events but may be allowed to do so at the discretion of the event leader should places be available (ie places should be given to families first). If the event leader has any concerns about the motivation of the adult then they must not allow them to take part and inform Security if necessary.

8 Requests for information about children or vulnerable adults

Staff must not give anyone (with the exception of the emergency services or social services) information about children or vulnerable adults in the Museum, regardless of who the person claims to be. Any request for information, including whether the child or vulnerable adult is in the Museum or their location in the Museum (eg if someone wishes to hand something to them), should be dealt with by contacting the child/vulnerable adult's responsible adult who should take the decision whether or not to provide the information.

9 Physical contact

Any physical contact between Museum staff and children or vulnerable adults is strongly discouraged. However, it is acknowledged that some very young or enthusiastic children or vulnerable adults may make contact with staff spontaneously. This is unavoidable but should not be encouraged and staff should never initiate physical contact. Staff working with under fives must not encourage children to sit on their knee, or offer to hold or pick up children.

It is acknowledged that physical contact may be necessary to prevent children or vulnerable adults hurting themselves, eg if someone is about to fall or run into an object etc. These kinds of situations should be noted and the nature of the contact recorded.

If physical contact is impossible to avoid because of the activity, eg in the case of dance-based events, costume workshops etc, the nature of the contact should be explained and agreed with the participant and/or their responsible adult before it takes place, and the participant given the opportunity not to take part if they wish.

Staff must not search children or vulnerable adults, or their property, without the approval of a responsible adult (who should preferably carry out any necessary search) who should be present at all times.

10 Vulnerable children and adults

The Museum welcomes users with physical and learning disabilities, and people for whom English is an additional language. It is important that these users are given assistance appropriate to their needs. However, for the protection of all parties, the following guidelines should be followed:

- staff should do all they can to obtain details of the needs of the users prior to the activity and to plan the activity accordingly
- staff should not provide mobility assistance – this should be provided by responsible adults. Staff may provide appropriate assistance to the responsible adults
- in the case of a vulnerable adult requiring assistance (eg a person with a visual impairment), then the nature of the contact should be explained and agreed before it takes place. If the vulnerable adult asks to be escorted to another location, then staff should ensure that a second member of staff is present
- responsible adults, not staff, should take responsibility for pushing wheelchairs or guiding other mobility devices. The exception is if the situation is an emergency or if the wheelchair user would be in danger if help was refused. In these cases permission should be obtained from the responsible adult and if this is not possible from the child or vulnerable adult

- where users do not have English as their first language, or have a speech or hearing impairment, staff should ensure that they are able to express themselves fully through responsible adults or translators/signers
- the guidelines on physical contact in 7 above should be followed at all times.

11 Medication and first-aid

Staff should not give a child or vulnerable adult medication under any circumstances.

If a child or vulnerable adult requires first-aid, this must be provided by a qualified first-aider, preferably a teacher or group leader where possible. Staff who are not qualified first-aiders must not give access to first-aid equipment to teachers, group leaders or parents unless they are qualified first-aiders. When at the Museum, a first-aider can be contacted by calling Security or by asking a member of gallery staff to radio for assistance.

In the case of medical emergency, two adults (at least one being a responsible adult) should attend the vulnerable person. A responsible adult should take the decision whether or not to call a doctor or ambulance.

12 Behavioural issues

Teachers, group leaders and parents/carers are responsible for managing the behaviour of the children or vulnerable adults in their care, and for dealing with any violent or inappropriate behaviour. However, if staff are physically attacked or threatened, they may take reasonable measures to protect themselves or to remove the threat. If necessary, staff may ask responsible adults to remove children or vulnerable adults.

13 Sensitive content

Staff should bear in mind that children and vulnerable adults may have complicated or traumatic backgrounds which could make them sensitive to certain issues (eg discrimination, disability, health, family relationships, early childhood etc). Any potentially sensitive content should be discussed in advance of the session with the teacher or group leader. Where this is not possible, eg in the case of a family or adult event, the issues should be covered with sensitivity.

Staff developing exhibitions or galleries should also bear this in mind and designs should give visitors choices about whether or not to engage with sensitive content.

14 Photography

Photographs or videos of children or vulnerable adults (individuals or in groups) where people could be recognised must not be taken without obtaining permission. This applies

to all photographs that may be used in any form of publication or broadcast including leaflets, brochures, websites, social networking sites, films etc.

In the case of school groups, parental consent will be required and this should be requested from the school in advance of the activity. If this is not possible, written permission should be obtained on the day from the teacher in charge of the group.

The Mental Capacity Act (2005) states that in the case of vulnerable adults, written permission should be obtained from the vulnerable adult themselves in a way that is accessible to them – their responsible adult should be consulted about the best way to do this. If this is not possible because the vulnerable adult does not have the capacity to give this permission, then the consent of the significant people in the adult's life will need to be obtained (never just one person).

In the case of family events, permission in writing from the children's parents/carers should be obtained on the day.

Where photographs of whole galleries etc are required and it is not feasible to obtain consent because of the number of people involved, or where people are too distant to be recognised, a notice should be prominently displayed in advance of and during the photography informing visitors that photographs will be taken in that area between specified times.

If photographs of children or vulnerable adults are to be used in printed materials, provided to the press or included on websites etc, any information which could be used to identify or trace the children or vulnerable adults should be withheld (eg names of individuals, names of schools, groups or institutions). Crests, badges etc on uniforms which feature the name of a school should not be shown or the school name should be digitally obscured where possible. Where providing the name of an individual, school, group etc is important (eg when celebrating an achievement, competition winners etc) written permission should be obtained.

Any information which could be used to identify or trace individuals should not be given to any enquirers.

15 Web and e-learning projects

The email or personal website addresses of children or vulnerable adults should not be disclosed by staff under any circumstances. No information which could be used to identify or trace individuals should be given to any enquirers or included in any web content.

Material submitted by children or vulnerable adults to the Museum website should be treated in the same way as photographs (see 12 above), ie any information which could be used to identify or trace individuals should be withheld unless written permission is obtained. Contributors of user generated content (UGC) are made aware of any content that is personal and likely to put people at risk. Guidelines are provided for potential contributors of UGC.

Photographs, films etc created by schools and colleges in e-learning sessions are only kept for one week (after which time they are automatically deleted) and are stored securely (ie access is password protected) in case the copies given to the school/college

is lost or damaged. Requests for copies of the films from the schools of colleges who created them must be made in writing from the head teacher/principal on headed paper.

If the Museum wishes to keep copies of photographs created by visitors for a longer period than one week, eg for promotional reasons, then written permission to keep and use the material in this way must be obtained from the creator.

16 Disclosure

If a child or vulnerable adult discloses any information to staff suggesting that they have been physically or sexually abused, this should be recorded in writing in as much detail as possible and referred to the Head of Learning who will take this up with their school/group/institution after consultation with the Corporation of London's Social Services Department.

If a person discloses such information, staff should take the disclosure seriously, listen to the person and accept what is being said. They should not express shock, ask leading questions or make promises they are unable to keep (eg to keep the information confidential or to stop the abuse happening). They should inform the person at the beginning of the disclosure that they will not be able to keep the information confidential. It may be appropriate to stop the disclosure if the member of staff feels that enough detail has been given to enable them to report it.

Remember that it is the responsibility of staff to record and refer the disclosure to the Head of Learning, not to act on the disclosure themselves.

17 Witnessing abuse

If physical or sexual abuse of a child or vulnerable adult in the Museum is observed by a member of staff they should report this immediately to the Duty Manager who will contact the police and inform the Head of Security and Head of Learning. The incident should be recorded in writing in as much detail as possible.

As staff are unlikely to have the necessary experience or expertise, they should not get involved in looking for signs of abuse (eg bruising) or neglect (eg very thin children) – this should be left to the relevant specialists, eg social workers, nurses, doctors and the police, and to people who know the individuals well and see them regularly, eg teachers, play workers and carers.

18 Allegations

Should a child or vulnerable adult accuse a member of staff of physical or sexual abuse, or any kind of inappropriate behaviour, this should be referred immediately to the individual's responsible adult. The incident should be recorded in writing in as much detail as possible and referred to the Head of Human Resources and the relevant Directorate Head.

If a member of staff is accused after the visit, say when a child is back at school or home, then the alleged incident will be referred to Head of Human Resources and the relevant Directorate Head and investigated. Staff are advised to make a note of the responsible adult(s) attending sessions so that they can be retrospectively identified as a possible witness.

If a member of staff is suspected of physical or sexual abuse, or any kind of inappropriate behaviour, then s/he will be suspended and the incident investigated and referred to the Corporation of London's Social Services Department. If necessary appropriate disciplinary action will be taken and the incident reported to the police.

19 Management of information

The Museum complies with the principles of the Data Protection Act (1998) and Human Rights Act (1998) in the way it collects, holds and disposes of personal information.

20 Code of conduct

Staff working with children or vulnerable adults should follow the following code of conduct.

You should always

- Respect the rights, dignity and worth of every individual and treat everyone with equality.
- Ensure that the welfare and safety of children and vulnerable people is your top priority.
- Be a good role model and display consistently high standards of behaviour and professionalism.
- Ensure that the activities that you are responsible for are appropriate to age, maturity and ability.
- Bear in mind the fact that children and vulnerable adults may have complicated and/or traumatic backgrounds which could make them sensitive to certain issues.
- Recognise individual's contributions and give positive, constructive feedback.
- Remember that someone else might misinterpret your words or actions, no matter how well intentioned.
- Take disclosures seriously and report them in writing as fully as possible.

You should never

- Be alone with children or vulnerable adults.
- Have physical contact or get very close to children or vulnerable adults without checking with a responsible adult and explaining what you are doing.
- Take children or vulnerable adults to the toilet.
- Give lifts in your car to children or vulnerable adults.
- Take children or vulnerable adults to your home.
- Use actions or language that may cause a child or vulnerable adult to lose self-esteem or confidence.
- Make sexually suggestive comments to a child or vulnerable adult, even in fun.
- Allow allegations made by a child or vulnerable adult against you to go unrecorded or not acted upon.