



**QUEEN'S  
UNIVERSITY  
BELFAST**

# **Code of Behaviour (Children and Adults at Risk)**

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Lead Responsibility	Director of People and Culture
Lead Author	Nichola McKay

## **Overview**

The following Code of Behaviour has been drafted to provide those working with children and adults at risk with appropriate behaviours to protect everyone from harm.

Developed by the Legal Services and Employee Relations Unit June 2021

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## 1. Statement

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The University engages with children and adults at risk through many different activities and events.

This Code of Behaviour sets out the expected behaviours for all those engaging with children and adults at risk for, or on behalf of, the University and by any organisations using the University's facilities/premises.

The welfare of children and adults at risk is paramount in all circumstances. By following this Code and the University's other safeguarding arrangements you will be helping to protect children and adults at risk from harm and yourself from having concerns being raised about your own behaviour.

## 2. Scope

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Those engaging/working with children and adults at risk for or on behalf of the University including;

- employees, members of the extended workforce (including student workers) and or students;
- any external organisation using the University's premises for work/activity/events with children and adults at risk.

### Children and /adults at Risk

A **child** is anyone who is under 18 years old.

An **adult at risk** is defined as a person aged 18 or over, whose exposure to harm, through abuse, exploitation or neglect may be increased by their:

- a) Personal characteristics (including, but not limited to, age, disability, special education needs, illness, mental or physical frailty or impairment, or disturbance in the functioning of the mind/brain.)
- b) Life circumstances (including, but not limited to, isolation, socio-economic factors and environmental living conditions.

This Code should be read in conjunction with the University's:

- Bullying and Harassment Complaints Procedure;
- Equality, Diversity and Inclusion Policy;
- eSafety Guidance;
- Policy on taking Photographs, Film or Audio Recordings of Children and Adults at Risk;
- any other safeguarding arrangements put in place for the work/activity/event with children and adults at risk.

## 3. Responsibilities

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**3.1 Line Managers and Responsible People** are responsible for ensuring that:

- anyone who engages or works with children and/or adults at risk are aware of the requirement to read and comply with this Code of Behaviour;
- any breach of this Code is actioned in line with the reporting requirements.

### 3.2 When working/engaging with children and adults at risk **Employees/ Extended Workforce/Students** must:

- comply with this Code of Behaviour;
- comply with the University's Equality, Diversity and Inclusion Policy and provide equality of opportunity and treatment to all, regardless of a person's gender identity/expression (this includes Transgender and Non-Binary people); pregnancy or maternity status; marital or civil partnership status; whether or not they have dependants (including caring responsibilities); religious belief or political opinion; race (including colour, nationality, ethnic or national origins, including Irish Travellers); disability; sexual orientation and age;
- comply the University's Bullying and Harassment Policy;
- comply with the University's eSafety Guidance, if relevant;
- comply with the University's Policy on Photographing, Filming and Audio Recording Children and Adults a Risk, if relevant;
- comply with any other safeguarding arrangements put in place for the work/activity/event with children and adults at risk.

### 3.3 The Legal Services and Employee Relations Unit is responsible for:

- reviewing, updating and communicating this Code;
- organising and delivering appropriate training.

## 4. Required Behaviours

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Remember the child and/or adult at risk's welfare is paramount in all work/activities and events.

Implement the safeguarding arrangements put in place for the work/event/activity with children and/or adults at risk.

Maintain high standards of personal and professional conduct/boundaries including sensitivity to cultural differences in the context of the work being undertaken. Recognise that special caution is required in moments when discussing sensitive issues;

Report any allegation or suspicion of abuse or any breach of the following;

- This Code of Behaviour;
- The University's eSafety Guidance;
- The University's Policy on Photographing, filming and audio recording children and adults at risk;
- The Equality, Diversity and Inclusion Policy;
- The Bullying and Harassment Complaints Procedure.

Report any incidents or concerns that cause you to believe that a child or an adult at risk is at risk of harm or abuse.

Treat everyone with dignity and with respect including respect for diversity.

Treat everyone equally, regardless of a person's gender identity/expression (this includes Transgender and Non-Binary people); pregnancy or maternity status; marital or civil partnership status; whether or not they have dependants (including caring responsibilities); religious belief or political opinion; race (including colour, nationality, ethnic or national origins, including Irish Travellers); disability; sexual orientation and age.

Ensure that whenever possible there is more than one adult present during activities with children, or at least you are within sight or hearing of others. Unless the reason for this has been firmly established and agreed with your manager and parental/carer consent has been provided and appropriate safeguarding measures are in place.

Ensure that any physical touching (if required) is provided with consent in an open environment and that the purpose is clear. If this is in a sporting situation it should be in accordance with the guidelines provided by the appropriate National Governing Body. Otherwise, physical touching will usually only be required in relation to delivering emergency care or by those working in Health and Social Care positions and should be in accordance with the guidelines provided by the appropriate National Governing Body. Any intimate care provided should only be provided by those working in Health and Social Care be appropriate to the task required, carried out sensitively and with respect for the individual's dignity and privacy.

Only use restraint where it is absolutely necessary to protect the individual or others from harm. Any restraint used should be proportionate to the risk of harm and should be recorded and reported.

Provide constructive rather than negative feedback.

Challenge unacceptable behaviour.

Be open, honest, and transparent.

Respect the right to personal privacy.

Be aware that your interactions/behaviours may be misrepresented/misinterpreted.

Maintain confidentiality, unless doing so would place the individual at risk of harm.

Work in partnership with other colleagues to ensure that everything possible is done to safeguard and promote the welfare of children and adults at risk.

Listen to and report any concerns that are raised with you.

Ensure equipment is safe and fit for purpose.

## **5. Impermissible/Unlawful Behaviours**

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Anyone who falls within scope of this Code of Behaviour must not engage in the following activities with children or adults at risk, some of which may be considered unlawful.

You must not:

### **Alone**

Spend excessive amounts of time alone with a child or adult at risk away from others during work/activities/events. If you must spend time alone with a child/adult at risk for e.g. research/treatment purposes etc. ensure this is with informed parental/carer consent and other safeguards are put in place (e.g. windowed rooms, open door) where possible. If you have concerns about meeting with a child or adult at risk alone, then these should be raised with your manager, and they should be accompanied to the meeting. If a child specifically asks for or needs some private time with you, ensure other staff should know where you and the child are.

Be alone with children or adults at risk away from organisational premises, such as taking them out on trips unaccompanied by other adults or transporting them alone, unless the reason for this is part of a work/event/activity authorised by a manager and with the consent of parents/carers, where required.

### **Child/Adult at Risk residential**

Share a room with a child or adult or adult at risk.

Enter a child's or adult at risk's room unless it is absolutely necessary. If you do need to enter a room, you must be accompanied.

### **Relationships**

Provide a child or vulnerable adult with your personal contact details including but not limited to you phone/mobile number, your social media accounts, your personal email address, your home address etc.

Invite a child or adult at risk that you have met through employment, work, studies, placement, or volunteering to your home, to a bar, to private social events or to other inappropriate locations.

Form what a reasonable person would believe is an inappropriate relationship with a child or adult at risk.

Give gifts to a child or adult at risk outside of an agreed reward scheme or receive gifts from a child or adult at risk.

Make/accept loans or gifts of money from a child or adult at risk.

Steal from or use a child or adult at risk for financial gain.

Sell anything to a child or adult at risk unless this is part of your role or for University business.

Engage in any form of abusive behaviour, neglect, harm, or place at risk of harm, a child or vulnerable adult whether by omission or commission.

Smoke, drink alcohol or take drugs in the company of a child or vulnerable adult.

Allow others to gain access to children or adults at risk.

Encourage or assist others to breach this Code or other safeguarding arrangements or to break the law in any way.

### **Child/Adult at risk behaviour**

Allow a child or vulnerable adult to use inappropriate language without challenging it.

Allow/supply a child or adult at risk with cigarettes, vapes, alcohol or recreational drugs.

Allow a child or adult at risk to bully or harass another person.

## **Bullying and Harassment**

Reduce a child or vulnerable adult to tears as a form of control.

Use your position to injure, coerce or undermine a child or vulnerable adult.

Bully or harass a child or adult at risk (see Bullying and Harassment Complaints Procedure), including cyberbullying.

## **Physical contact**

Do personal things for a child or adult at risk which they can do for themselves. If a child has a disability any tasks should only be performed with the full understanding and consent of the parents/carers.

Playing rough/boisterous physical games. For those involved with children and sports, sporting events should be played in accordance with the guidelines provided by the appropriate National Governing Body.

Allow or engage in any form of inappropriate touching.

Use restraint unless it is absolutely necessary to protect the individual or others from harm. Any restraint used should be proportionate to the risk of harm and should be recorded and reported.

## **Sexual Behaviour**

Engage in, or attempt to engage in any form of sexual behaviour, sexual relations or sexually inappropriate relationship with a child or adult at risk.

Use your status or position to groom, form or promote relationships with any child or adult at risk, either face to face or online, which are of a sexual nature, or which may become so.

Play sexually provocative games.

Make sexually suggestive/derogatory comments even in jest to or in the presence of a child or adult at risk.

Exchange money, employment, goods or services for sexual favours.

Possess abusive images of any children or 'adult at risk'.

Allow others to engage in any form of sexual/grooming behaviour with a child or adult at risk.

## **Confidentiality**

Gossip about the personal details about a child or adult at risk or their families.

Disclose confidential information in relation to any allegation made by/about a child or adult at risk unless as required during the investigation process.

Seek information to which you have no right of access.

## Lack of appropriate action

Ignore or fail to act on or record any allegations/suspicions about a child or adult at risk.

Either exaggerate or trivialise child or adult abuse/harm or breach of any relevant policies/procedures.

## 6. What to report

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Although we aim to keep children and adults at risk safe during our activities with them there may be times when you have concerns that you feel should be reported. Below are examples of concerns/incidents which must be reported.

When:

- there has been any breach of:
  - this Code of Behaviour;
  - the Bullying and Harassment Complaints Procedure;
  - the Equality, Diversity and Inclusion Policy;
  - the Policy on Photographing, Filming or Audio Recording Children and Adults at Risk;
  - the University's eSafety Guidance;
  - any other safeguarding arrangements out in place for the work/activity/event.
- a child or adult at risk is accidentally hurt;
- there is concern that a relationship is developing which may be an abuse of trust;
- you are worried that a child or adult at risk is becoming attracted to you;
- you are worried that a child or adult at risk is becoming attracted to a colleague;
- you think a child or adult at risk has misunderstood or misinterprets something you have done;
- you have been required to physically restrain a child or adult at risk to prevent them from harming themselves or another or from causing significant damage to property;
- you receive a report from a child or adult at risk alleging abuse regarding a member of an external organisation using Queen's facilities;
- you see any suspicious marks on, or notice suspicious behaviours by, a child or adult at risk;
- allegations of harm/abuse have been made by a child or adult at risk or someone acting on their behalf;
- you believe a child or adult at risk may have been subjected to some form of abuse or harm in any situation;
- you believe an individual **has** engaged in:
  - i. conduct which endangers a child or vulnerable adult\* or is likely to endanger a child or vulnerable adult;
  - ii. conduct which, if repeated against or in relation to a child or vulnerable adult would endanger that child or vulnerable adult or would be likely to endanger him;
  - iii. conduct involving sexual material relating to children (including possession of such material);
  - iv. conduct involving sexually explicit images depicting violence against human beings (including possession of such images), if it appears to the ISA that the conduct is inappropriate;
  - v. conduct of a sexual nature involving a child or vulnerable adult, if it appears to the Independent Safeguarding Authority that the conduct is inappropriate.

A person's conduct endangers a child or vulnerable adult if they:

- i. Harm a child or vulnerable adult;
- ii. Cause a child or vulnerable adult to be harmed;
- iii. Put a child or vulnerable adult at risk of harm;
- iv. Attempt to harm a child or vulnerable adult; or
- v. Incite another to harm a child or vulnerable adult.

\*in this context the term vulnerable adult will refer to an adult at risk as well as to anyone who is in provision of a service relating to health care, personal care, social work, assistance with their own affairs, assistance in relation to general household matters and conveying (e.g. ambulance drivers)

## **7. Breach of the Code and Associated Policies/Procedures**

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Anyone who breaches the behaviours set out in this Code (and any other associated policy/procedure) will be subject to:

- i. An internal investigation into your conduct under the relevant policy or regulation (e.g. Disciplinary, Conduct etc.) which may lead to dismissal/expulsion from the University.
- ii. A referral to, and possible investigation by, a statutory agency (e.g. Social Services or the PSNI) which may result in a criminal charge.
- iii. A referral to the Disclosure and Barring Service which may result in you being barred from working in regulated activity with children and adults at risk.

## **8. Training**

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Training on the Code of Behaviour will be included in the University's Safeguarding training for those working with Children and Adults at Risk.

Equality, Diversity and Inclusion training is available on Queen's Online.

## **9. Communication, Co-operation, and Co-ordination**

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The Code will be communicated to: Heads of School/Directors, Responsible People and all those who engage with children and adults at risk.

## **10. Equality and Diversity**

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The University values and promotes equality and diversity and will seek to ensure that it treats all individuals fairly and with dignity and respect. It is opposed to all forms of unlawful and unfair discrimination.

The University seeks to provide equality to all, irrespective of: gender, including gender re-assignment; marital or civil partnership status; having or not having dependants; religious belief or political opinion; race (including colour, nationality, ethnic or national origins, including Irish Travellers); disability; sexual orientation and age.

## 11. Approval and Review

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This Policy and supporting Guidance were approved by the University's Children and Adults at Risk Safeguarding Group on 6 May 2021 and will be reviewed on a three-year basis, or as required due to changes in legislation or University requirements.

## 12. Consultation

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Members of the Children and Adults at Risk Safeguarding Group were consulted in the development of this Guidance.

## 13. Implementation and Monitoring

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The implementation and effectiveness of this Guidance will be monitored by the Legal Services and Employee Relations Unit. This will be completed through a number of indicators including general feedback and reviewing any concerns that are raised.

## 14. Communication and Further Advice

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This Policy is available on the People and Culture Directorate webpage. Advice can be provided by the Legal Services and Employee Relations Unit.

## 15. Document Control

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This document is maintained, controlled, and formally reviewed by the Legal Services and Employee Relations Unit. This document is maintained electronically, and the latest issue will be displayed on the People and Culture SharePoint Site. Printed copies shall be treated as uncontrolled documents.

Comments or queries relating to the contents of this document should be referred to: Legal Service and Employee Relations, e-mail: [legalservices@qub.ac.uk](mailto:legalservices@qub.ac.uk)

## 16. Document Change Log

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The following changes have been made as part of the review of this Policy.

Date	Change	Page or Section
6 May 21	Policy and Guidance revised	All